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File #: 175564

September 9, 2019

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Petition of PPL Electric Utilities Corporation for Approval of Tariff Modifications
and Waivers of Regulations Necessary to Implement its Distributed Energy
Resources Management Plan
Docket No. P-2019-3010128**

Dear Secretary Chiavetta:

Enclosed is the Prehearing Conference Memorandum of PPL Electric Utilities Corporation for filing in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DTR/jl
Enclosures

cc: Honorable Emily I. DeVoe
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of Tariff Modifications and :
Waivers of Regulations Necessary to : Docket No. P-2019-3010128
Implement its Distributed Energy Resources :
Management Plan :

**PREHEARING CONFERENCE MEMORANDUM OF
PPL ELECTRIC UTILITIES CORPORATION**

TO ADMINISTRATIVE LAW JUDGE EMILY I. DEVOE:

Pursuant to 52 Pa. Code § 5.224(c) and the Prehearing Conference Order dated August 28, 2019, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby submits this Prehearing Conference Memorandum in the above-captioned matter and states as follows:

I. PROCEDURAL HISTORY

On May 24, 2019, PPL Electric filed its Petition for Approval of Tariff Modifications and Waivers of Regulations Necessary to Implement its Distributed Energy Resources Management Plan (“DER Management Plan”) with the Pennsylvania Public Utility Commission (“Commission”). The DER Management Plan will govern the interconnection and operation of new Distributed Energy Resources (“DERs”) deployed in the Company’s service territory.

On May 29, 2019, PPL Electric filed a letter requesting that notice of the Petition be published in the *Pennsylvania Bulletin*.

On June 29, 2019, notice of the Petition was published in the *Pennsylvania Bulletin*. See 49 Pa.B. 3454. Per that notice, formal protests and petitions to intervene were due on or before July 15, 2019.

On July 10, 2019, a Secretarial Letter was issued directing PPL Electric to serve the Secretarial letter upon additional solar entities notifying them of the Petition. Further, the deadline to file protests/comments was extended until 4:30 PM on July 30, 2019.

On July 12, 2019, PPL Electric filed a letter and certificate of service evidencing that it served the Secretarial Letter upon additional solar entities, as required by the Secretarial Letter.

On July 20, 2019, the substance of the Secretarial Letter was published as a notice in the *Pennsylvania Bulletin*. See 49 Pa.B. 3853.

On July 29, 2019, Trinity Solar filed Comments on the Company's Petition.

On July 30, 2019, the Office of Consumer Advocate ("OCA"), Natural Resources Defense Council ("NRDC"), and Sunrun, Inc. ("Sunrun") filed Answers to the Petition. NRDC and Sunrun also filed Petitions to Intervene.

Further, on July 30, 2019, Comments were filed by Sustainable Energy Fund ("SEF"), GridLab, the Solar Unified Network of Western Pennsylvania ("SUNWPA"), Energy Independent Solutions, LLC ("EIS"), the Interstate Renewable Energy Council, Inc. ("IREC"), the Pennsylvania Solar Energy Industries Association ("PASEIA"), and Exact Solar.

Based on a review of the online docket, the matter was assigned first to the Office of Special Assistants ("OSA") on August 6, 2019, and then transferred later that same day to the Office of Administrative Law Judge ("OALJ").

On August 22, 2019, PPL Electric filed a letter inquiring about the procedural status of the proceeding and requesting that the matter being assigned to an administrative law judge for hearings.

Also on August 22, 2019, an Interim Order was issued granting the Petitions to Intervene filed by NRDC and Sunrun.

On August 28, 2019, Administrative Law Judge Emily I. DeVoe (“ALJ”) issued the Prehearing Conference Order, which set forth certain procedural rules for the proceeding and directed the parties to file prehearing memoranda on or before Noon on September 9, 2019. A Notice also was issued scheduling the telephonic prehearing conference for September 11, 2019, at 2:00 PM.

On August 30, 2019, NRDC and Sunrun filed: (1) a Preliminary Objection to PPL Electric’s August 22, 2019 letter; and (2) a Motion for Leave to Reply and a Reply to PPL Electric’s August 22, 2019 letter. The pleadings were served by email and first class mail.¹ However, the email serving the pleadings was sent after 4:30 PM, and the hard copies were sent via first class mail. Therefore, under the Commission’s regulations, the pleadings were deemed to have been served on Tuesday, September 3, 2019, not Friday, August 30, 2019.

On September 3, 2019, SEF filed a Petition to Intervene.

PPL Electric herein files this Prehearing Memorandum pursuant to 52 Pa. Code § 5.224(c) and the Prehearing Conference Order.

II. SERVICE OF DOCUMENTS

PPL Electric requests that Devin T. Ryan, Esquire, be listed on the service list on behalf of the Company. His contact information is provided below:

Devin T. Ryan (ID # 316602)
Post & Schell, P.C.
17 North Front Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970

¹ See 52 Pa. Code § 1.56(a) (stating that “[t]he date of service shall be the earliest day when the document served” is, among other things, “transmitted by telefacsimile or electronic mail as provide in § 1.54(b) (relating to service by a party) prior to 4:30 p.m. local prevailing time” or “deposited in the United States mail”); *id.* § 1.56(b) (“Unless otherwise prescribed by the Commission or presiding officer, whenever a party is required or permitted to do an act within a prescribed period after service of a document upon the party and the document is served by first-class mail by the United States Postal Service, 3 days shall be added to the prescribed period.”).

Fax: 717-731-1985
E-mail: dryan@postschell.com

PPL Electric agrees to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies be served upon Kimberly A. Klock, Esquire, at kklock@pplweb.com, Michael J. Shafer, Esquire, at mjshafer@pplweb.com, and David B. MacGregor, Esquire, at dmacgregor@postschell.com.

David B. MacGregor, Esquire, will be the Company's lead representative at the prehearing conference.²

III. WITNESSES AND ISSUES

The Company's presently-identified witnesses, as well as their subject matter of their testimony, are set forth below:

Sal Salet
Director - Operations
PPL Electric Utilities Corporation
2 North Ninth Street
WNBOB
Allentown, PA 18101

Overview of the Filing, the Company's Proposal, and Other Witnesses' Testimony; Tariff Modifications; Waivers of Regulations; Technical Questions about the Company's Proposal

Wanda Reder
President & CEO
Grid-X Partners, LLC
34W676 Country Club Road
Wayne, IL 60184

Need for the Company's Proposal; Implications and Effects of DERs; Policy Questions about the Company's Proposal

PPL Electric's witnesses will demonstrate that the Company's proposed tariff modifications and waivers of regulations, which are necessary to implement the DER Management Plan, are reasonable and in the public interest and should be approved.

² See Prehearing Conference Order, p. 2 (stating that "[p]arties represented by multiple attorneys should designate a lead representative for the purposes of the prehearing conference in their prehearing memorandum").

PPL Electric is still in the process of identifying and securing additional witnesses who will be submitting direct testimony on behalf of the Company. PPL Electric reserves the right to call additional witnesses, present testimony, or both on additional issues and subject matters that may arise during the course of this proceeding.

IV. DISCOVERY

PPL Electric does not propose any special orders regarding discovery. PPL Electric is willing to work with the parties, through informal discovery, to expedite discovery. The protection of confidential information is addressed in Section VI below.

V. PROCEDURAL SCHEDULE

PPL Electric proposes the following procedural schedule:

October 30, 2019 – PPL Electric’s Direct Testimony

December 18, 2019 – Other Parties’ Direct Testimony

January 22, 2019 – Rebuttal Testimony

February 5, 2019 – Evidentiary Hearing in Harrisburg

March 5, 2019 – Main Briefs

March 24, 2019 – Reply Briefs

PPL Electric requests that the due dates established in this proceeding be “in-hand” due dates, meaning that copies must be sent to all parties via email by 4:30 PM.

VI. PROTECTION OF CONFIDENTIAL INFORMATION

If any confidential information is requested or will be presented in this proceeding, PPL Electric will work with the other parties on a Motion for Protective Order for the ALJ’s

consideration. PPL Electric will seek the concurrence of the other parties as to the form of the Protective Order before the Motion is submitted.

VII. SETTLEMENT DISCUSSIONS

To date, no settlement discussions have been held. However, PPL Electric remains willing to work the parties in an effort to resolve this proceeding through settlement.

Respectfully submitted,



Kimberly A. Klock (ID # 89716)
Michael J. Shafer (ID # 205681)
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
Phone: 610-774-5696
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E-mail: kklock@pplweb.com
E-mail: mjshafer@pplweb.com

David B. MacGregor (ID # 28804)
Devin T. Ryan (ID # 316602)
Post & Schell, P.C.
17 North Second Street
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Harrisburg, PA 17101-1601
Phone: 717-731-1970
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E-mail: dmacgregor@postschell.com
E-mail: dryan@postschell.com

Date: September 9, 2019

Counsel for PPL Electric Utilities Corporation

CERTIFICATE OF SERVICE

(Docket No. P-2019-3010128)

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

Darryl A. Lawrence, Esquire
Phillip D. Demanchick, Esquire
David T. Evrard, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Mark C. Szybist, Esquire
1152 15th Street, NW, Suite 300
Washington, DC 20005
Natural Resources Defense Council

James M. Van Nostrand, Esquire
Keyes & Fox LLP
275 Orchard Drive
Pittsburgh, PA 15228
Sunrun Inc.

Ed Merrick, VP of Regulatory Affairs
Trinity Solar
2211 Allenwood Road
Wall, NJ 07719

Kenneth L. Mickens, Esquire
316 Yorkshire Drive
Harrisburg, PA 17111
Sustainable Energy Fund

Sharon Pillar, Policy Director
Solar Unified Network of Western PA
c/o Energy Innovation Center
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Pittsburgh, PA 15219

Joseph Morinville
Energy Independent Solutions, LLC
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Sara Baldwin, VP
Interstate Renewable Energy Council
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Albany, NY 12204

Ron Celentano, President
Pennsylvania Solar Energy Industries
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Wyndmoor, PA 19038


VIA FIRST CLASS MAIL

Beren Argetsinger, Esquire
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Burdett, NY 14818

Ric O'Connell
Gridlab
20120 University Avenue
Berkeley, CA 94704

John Costlow, President
Sustainable Energy Fund
4110 Independence Drive, Suite 100
Schnecksville, PA 18078

Date: September 9, 2019

A handwritten signature in black ink, appearing to read "Devin Ryan", is written over a horizontal line. The signature is stylized and somewhat abstract.

Devin Ryan