



January 13, 2020

via electronic mail

Devin T. Ryan, Esq.
David B. MacGregor, Esq.
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601

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

Dear Counsel,

Please find the enclosed copy of Interrogatories of the Natural Resources Defense Counsel, Set I, in the above-captioned proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these Interrogatories within twenty (20) days of service. Also, please forward the verified answers as they are completed instead of waiting until full responses to the entire set are completed. If you have objections, please communicate those as soon as possible.

If you have questions, please call or email any one of NRDC's attorneys. A certificate of service has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission in accordance with 52 Pa. Code § 5.341(b).

Respectfully submitted,

Emily A. Collins
PA Bar No. 208990
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(234) 571-1971 (direct)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing letter has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54:

<p>Hon. Mary D. Long Pennsylvania Pub. Util. Commission Piatt Place, Suite 220 301 5th Avenue Pittsburgh, PA 15222 malong@pa.gov</p> <p><i>via electronic filing (COS only)</i></p>	<p>Devin T. Ryan, Esq. Post & Schell, P.C. 17 North Second Street, 12th Floor Harrisburg, PA 17101-1601 dryan@postschell.com jlangan@postschell.com</p> <p><i>for PPL Electric Utilities Corp. via electronic mail</i></p>
<p>David B. MacGregor, Esq. Post & Schell, P.C. 17 North Second Street 12th Floor Harrisburg, PA 17101-1601</p> <p><i>for PPL Electric Utilities Corp. via USPS mail</i></p>	<p>Kimberly A. Klock, Esq. Michael J. Schafer, Esq. PPL Electric Utilities Corporation 2 North 9th Street Allentown, PA 18101-1179 kklock@pplweb.com mlbartolomei@pplweb.com</p> <p><i>via electronic mail and USPS mail</i></p>
<p>Ed Merrick, VP of Regulatory Affairs Trinity Solar 2211 Allenwood Rd Wall, NJ 07719 Ed.marrick@trinity-solar.com</p> <p><i>via electronic mail</i></p>	<p>Kenneth L. Mickens, Esq. 316 Yorkshire Drive Harrisburg, PA 17111-6933 Kmickens11@verizon.net</p> <p><i>for Sustainable Energy Fund via electronic mail</i></p>
<p>Phillip D. Demanchick, Esq. Darryl A. Lawrence, Esq.</p>	<p>Joseph Morinville, CEO Energy Independent Solutions, LLC.</p>

<p>David T. Evrard, Esq. Office of Consumer Advocate 555 Walnut Street 5th Floor Forum Place Harrisburg, PA 17101 PDemanchick@paoca.org DLawrence@paoca.org</p> <p><i>via electronic mail and USPS mail</i></p>	<p>2121 Noblestown Road Suite 222 Pittsburgh, PA 15205 joe@eisolar.com</p> <p><i>via electronic mail</i></p>
<p>Mark Bortman Exact Solar 1655 Fairfield Road Yardley, PA 19067 mark@exactsolar.com</p> <p><i>via electronic mail</i></p>	<p>Ron Celentano, President PA Solar Energy Industries Association 7821 Flourtown Avenue Wyndmoor, PA 19038 CelantanoR@aol.com</p> <p><i>via electronic mail</i></p>
<p>James Van Nostrand, Esq. Keyes & Fox LLP 275 Orchard Drive Pittsburgh, PA 15228 jvannostrand@keyesfox.com</p> <p><i>via electronic mail</i></p>	<p>Beren Argetsinger, Esq. Keyes & Fox LLP P.O. Box 166 Burdett, NY 14818 bargetsinger@keyesfox.com</p> <p><i>via electronic mail</i></p>
<p>Sara Baldwin, VP Interstate Renewable Energy Council, Inc. 125 Wolf Road Suite 207 Albany, NY 12205 sarab@irecusa.org</p> <p><i>via electronic mail</i></p>	<p>Sharon Pillar, President Solar Unified Network of Western PA 1435 Bedford Avenue Suite 140 Pittsburgh, PA 15143 pillarsharon@gmail.com</p> <p><i>via electronic mail</i></p>
<p>John Costlow, President Sustainable Energy Fund 4110 Independence Drive Suite 100 Schnecksville, PA 18078</p> <p><i>via USPS mail</i></p>	<p>Ric O'Connell Gridlab 20120 University Avenue Berkeley, CA 94704</p> <p><i>via USPS mail</i></p>
<p>Richard A. Kanaskie, Esq. Bureau of Investigation and Enforcement Pennsylvania Public Utility Commission</p>	

Commonwealth Keystone Building 400 North Street Harrisburg, PA 17105-3265	
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via USPS mail

Dated: January 13, 2020

Respectfully submitted,



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Andrew J. Karas, Esq. (Pa Bar ID 321231)

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