



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Main Fax  
www.postschell.com

---

Devin Ryan

dryan@postschell.com  
717-612-6052 Direct  
717-731-1981 Direct Fax  
File #: 167945

February 6, 2020

***VIA E-MAIL & FIRST CLASS MAIL***

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

Andrew J. Karas, Esquire  
Emily A. Collins, Esquire  
Fair Shake Environmental Legal Services  
647 E. Market Street  
Akron, OH 44302

**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 Counsel:

Enclosed are the Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Natural Resources Defense Council – Set I in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Please provide answers to the enclosed discovery within twenty (20) days of the date of service, pursuant to 52 Pa. Code § 5.342.

Sincerely,

Devin Ryan

DTR/dmc  
Enclosures

cc: Rosemary Chiavetta (*Letter & Certificate of Service Only*)  
Certificate of Service

**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 15<sup>th</sup> Street, NW, Suite 300  
Washington, DC 20005  
*Natural Resources Defense Council*

Andrew J. Karas, Esquire  
Emily A. Collins, Esquire  
Fair Shake Environmental Legal Services  
647 E. Market Street  
Akron, OH 44302  
*Natural Resources Defense Council*

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

Beren Argetsinger, Esquire  
Keyes & Fox LLP  
PO Box 166  
Burdett, NY 14818  
*Sunrun Inc.*

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

Date: February 6, 2020



Devin Ryan