

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for :  
Approval of a Default Service Program for the : Docket No. P-2020-3019356  
Period of June 1, 2021 through May 31, 2025 :

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**JOINT STIPULATION OF**

**INTERSTATE GAS SUPPLY, INC., SHIPLEY CHOICE LLC, NRG ENERGY, INC.,  
VISTRA ENERGY CORP., ENGIE RESOURCES LLC, WGL ENERGY SERVICES,  
INC., AND DIRECT ENERGY SERVICES, LLC**

**AND**

**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY  
EFFICIENCY IN PENNSYLVANIA (CAUSE-PA)**

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Interstate Gas Supply, Inc., Shipley Choice, LLC, NRG Energy, Inc., Vistra Energy Corp., Engie Resources, LLC, WGL Energy Services, Inc., and Direct Energy Services, LLC (EGS Parties) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) (together, Stipulating Parties) by their respective counsel, hereby enter into a Joint Stipulation with regard to the captioned proceeding as follows:

1. The Stipulating Parties agree to the entry of the prepared, preserved written testimony of each into the record and each agrees to waive cross examination of the other party's witness.
2. The Stipulating Parties respectfully request that the following interrogatory responses, attached hereto as Appendix A, be admitted into the evidentiary record in the above-captioned proceeding, and stipulate to the accuracy and truthfulness of the facts and data contained therein:
  - a. CAUSE-PA to EGS Parties I-1
  - b. PPL to EGS Parties I-1
  - c. PPL to EGS Parties I-2
  - d. PPL to EGS Parties II-3
  - e. OCA to EGS Parties IV-9
  - f. OCA to EGS Parties IV-12

**WHEREFORE**, the Stipulating Parties, by their respective counsel, respectfully request that the Honorable Administrative Law Judge Elizabeth Barnes admit the foregoing interrogatory responses into the record in this proceeding.

Respectfully Submitted,

*Counsel for CAUSE-PA*



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## **APPENDIX A**

JOINT STIPULATION OF EGS PARTIES AND CAUSE-PA

**RESPONSES OF THE EGS PARTIES  
INTERROGATORIES AND REQUEST  
FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY  
THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY  
EFFICIENCY IN PENNSYLVANIA (CAUSE-PA), SET I**

**DOCKET NO. P-2020-3019356**

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**CAUSE-PA to EGS Parties I-1.** See ESC Statement 1, at 10:14-15. Have the EGS Parties had any communications with PPL Electric regarding perceived issues with its CAP-SOP?

Please provide a copy or record of any and all communications of the EGS Parties with PPL requesting a meeting or otherwise raising issues or identifying proposed changes to PPL's CAP-SOP, and identify the date in which such communications occurred.

**RESPONSE:**

No.

**Provided By:** Christopher Kallaher  
Senior Director, Government and Regulatory Affairs  
Direct Energy Services, LLC

**RESPONSES OF THE EGS PARTIES  
INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY  
PPL ELECTRIC UTILITIES CORPORATION, SET I**

**DOCKET NO. P-2020-3019356**

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**EGS Parties-I-1:** Reference Exhibit EGS-2: Provide all data used to derive the claimed savings of \$28.1 Million over the PPL Electric PTC.

**RESPONSE:**

Exhibit EGS-2 is a publicly available document published by the Retail Energy Supply Association. I am not in possession of the data underpinning the information set forth in that document.

**Provided By:** Christopher Kallaher  
Senior Director, Government and Regulatory Affairs  
Direct Energy Services, LLC

**RESPONSES OF THE EGS PARTIES  
INTERROGATORIES AND REQUESTS  
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**DOCKET NO. P-2020-3019356**

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**EGS Parties-I-2:** Reference page 11: Please quantify what would qualify as a “modest reduction” to the CAP SOP price.

**RESPONSE:**

A reduction from a seven percent discount to a five percent discount would be modest, in my view.

**Provided By:** Christopher Kallaher  
Senior Director, Government and Regulatory Affairs  
Direct Energy Services, LLC

**RESPONSES OF THE EGS PARTIES  
INTERROGATORIES AND REQUESTS  
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PPL ELECTRIC UTILITIES CORPORATION, SET II**

**DOCKET NO. P-2020-3019356**

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**EGS Parties-II-3:** If PPL were to allow CAP customers to remain with their CAP SOP EGS at the end of the 12-month contract term as long as the EGS agreed to serve them at or below the current PTC, how do the EGS Parties recommend this requirement be monitored and enforced? What penalty should be imposed on those EGSs who violate the requirements of the program?

**RESPONSE:**

Consistent with the Commission's Order, Petition of Metropolitan Edison Company, et al. for Approval of Default Service Program for the Period Beginning June 1, 2019 through May 31, 2023; Docket Nos. P-2017-263855, et seq. (Final Order entered February 28, 2019, pp. 15-16. directing requirements for CAP shopping in the First Energy service territory, the responsibility of monitoring and enforcement should lie with the Commission through the use of traditional mechanisms including careful monitoring of consumer informal and formal complaints. Also Consistent with the Commission's Order, *Id.*, an EGSs found to be in violation of the program's requirements should be subject to any enforcement mechanisms available to the Commission. Moreover, the Order makes it clear that EDI systems should reject prices for CAP customers that exceed the price to compare.

**Provided By:** Christopher Kallaher  
Senior Director, Government and Regulatory Affairs  
Direct Energy Services, LLC

**RESPONSES OF  
CHRISTOPHER H. KALLAHER, EGS COALITION,  
INTERROGATORIES TO OFFICE OF CONSUMER ADVOCATE, SET IV**

**DOCKET NO. P-2020-3019356**

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9. Has Mr. Kallaher or any member of his EGS coalition done a comparison of the PTC for default service compared to the price residential customers pay to EGSs over a period of time other than one month? If so, please provide that analysis.

**RESPONSE:**

No.

**Provided By:** Christopher Kallaher  
Senior Director, Government and Regulatory Affairs  
Direct Energy Services, LLC



**RESPONSES OF  
CHRISTOPHER H. KALLAHER, EGS COALITION,  
INTERROGATORIES TO OFFICE OF CONSUMER ADVOCATE, SET IV**

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12. Has Mr. Kallaher reviewed the prices charged by the EGSs stated in PPL's analysis of post-SOP contracts and, if so, does he find these prices reasonable? If so, provide the basis for the reasonableness of these prices in terms of the retail or wholesale market conditions.

**RESPONSE:**

There are no actual EGS prices disclosed in Ms. LaWall-Schmidt's testimony and, thus, I have reviewed no prices charged by EGSs in connection with Ms. LaWall-Schmidt's testimony.

**Provided By:** Christopher Kallaher  
Senior Director, Government and Regulatory Affairs  
Direct Energy Services, LLC