
Devin Ryan
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File #: 175564

September 3, 2020

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 for filing is the Joint Stipulation for Admission of Evidence in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DR/jl
Enclosures

cc: Honorable Mary D. Long
Honorable Emily I. DeVoe
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 ONLY

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
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Natural Resources Defense Council

Andrew J. Karas, Esquire
Emily A. Collins, Esquire
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PO Box 166
Burdett, NY 14818
Sunrun Inc.

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

Date: September 3, 2020



Devin Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

JOINT STIPULATION FOR ADMISSION OF EVIDENCE

TO ADMINISTRATIVE LAW JUDGES MARY D. LONG AND EMILY I. DEVOE:

PPL Electric Utilities Corporation (“PPL Electric”), the Office of Consumer Advocate (“OCA”), the Natural Resources Defense Council (“NRDC”), and the Sustainable Energy Fund (“SEF”), all parties in the above-captioned proceeding (hereinafter collectively referred to as the “Joint Petitioners”), hereby submit this Joint Stipulation for Admission of Evidence (the “Evidence Stipulation”).

Specifically, the Joint Petitioners request that Administrative Law Judges Mary D. Long and Emily I. DeVoe (“ALJs”) admit the testimony and the exhibits listed below into the record in the above-captioned proceeding:

I. PPL ELECTRIC’S TESTIMONY AND EXHIBITS

1. PPL Electric Statement No. 1 – Direct Testimony of Salim Salet, including PPL Electric Exhibit SS-1.
2. PPL Electric Statement No. 2 – Direct Testimony of Wanda Reder.
3. PPL Electric Statement No. 3 – Direct Testimony of Karen Miu, PhD., including PPL Electric Exhibit KM-1 and PPL Electric Exhibit KM-2 (HIGHLY CONFIDENTIAL).
4. PPL Electric Statement No. 4 – Direct Testimony of Stephen Whitley, including PPL Electric Exhibits SW-1 and SW-2.

5. PPL Electric Statement No. 5 – Direct Testimony of Aaron Bayles.
6. PPL Electric Statement No. 1-R – Rebuttal Testimony of Salim Salet, including PPL Electric Exhibits SS-1R through SS-3R.
7. PPL Electric Statement No. 2-R – Rebuttal Testimony of Wanda Reder, including PPL Electric Exhibits WR-1R through WR-3R.
8. PPL Electric Statement No. 4-R – Rebuttal Testimony of Stephen Whitley.
9. PPL Electric Statement No. 5-R – Rebuttal Testimony of Aaron Bayles.
10. PPL Electric Statement No. 6-R – Rebuttal Testimony of Matthew Wallace, including PPL Electric Exhibits MW-1R through MW-5R.
11. PPL Electric Statement No. 7-R – Rebuttal Testimony of Bethany L. Johnson (Proprietary and Non-Proprietary Versions), including PPL Electric Exhibit BLJ-1R.
12. PPL Electric Statement No. 1-RJ – Rejoinder Testimony of Salim Salet, including PPL Electric Exhibit SS-1RJ.
13. PPL Electric Statement No. 2-RJ – Rejoinder Testimony of Wanda Reder.
14. PPL Electric Statement No. 3-RJ – Rejoinder Testimony of Karen Miu, PhD., including PPL Electric Exhibit KM-1RJ (HIGHLY CONFIDENTIAL).
15. PPL Electric Statement No. 4-RJ – Rejoinder Testimony of Stephen Whitley.
16. PPL Electric Statement No. 6-RJ – Rejoinder Testimony of Matthew Wallace, including PPL Electric Exhibits MW-1RJ and MW-2RJ.
17. PPL Electric Statement No. 7-RJ – Rejoinder Testimony of Bethany L. Johnson, including PPL Electric Exhibit BLJ-1RJ.

II. OCA'S TESTIMONY AND EXHIBITS

18. OCA Statement No. 1 – Direct Testimony of Ron Nelson (CONFIDENTIAL and Public Versions), including OCA Schedule REN-1 and OCA Schedule REN-2, the latter of which contains CONFIDENTIAL and HIGHLY CONFIDENTIAL information.

19. OCA Statement No. 1-SR – Surrebuttal Testimony of Ron Nelson.

III. NRDC'S TESTIMONY AND EXHIBITS

20. NRDC Statement No. 1 – Direct Testimony of Harry Warren (Proprietary and Non-Proprietary Versions), including NRDC Exhibits A through C.

21. NRDC Statement No. 1-SR – Surrebuttal Testimony of Harry Warren, including NRDC Exhibit HW-SR1.

IV. SEF'S TESTIMONY AND EXHIBITS

22. SEF Statement No. 1 – Direct Testimony of John M. Costlow (Proprietary and Non-Proprietary Versions), including SEF Cross Examination Exhibit 1 (contains CONFIDENTIAL and HIGHLY CONFIDENTIAL information).

23. SEF Statement No. 2 – Direct Testimony of Ronald E. Celentano, including SEF Cross Examination Exhibit 2.

24. SEF Statement No. 1-SR – Surrebuttal Testimony of John M. Costlow.

25. SEF Statement No. 2-SR – Surrebuttal Testimony of Ronald E. Celentano.

26. Verifications for PPL Electric's rejoinder testimony and exhibits are attached hereto as **Appendix A**. Mr. Aaron Bayles's verification for his rebuttal testimony was served on the ALJs and the other parties via separate cover letter on March 5, 2020. All other verifications for the parties' witnesses were attached to the witnesses' pre-served testimony.

27. The admission by stipulation of the foregoing testimony and exhibits is subject to Commission approval of the Joint Petition for Settlement to be filed by October 5, 2020. The

Joint Petitioners reserve their respective rights to submit additional testimony and to cross-examine witnesses in the event the Joint Petition for Settlement is not approved.

WHEREFORE, the Joint Petitioners, by their respective counsel, respectfully request that Administrative Law Judge Mary D. Long and Emily I. DeVoe admit the foregoing testimony and exhibits into the record in this proceeding.

Respectfully submitted,



Date: September 3, 2020

David B. MacGregor (ID # 28804)
Devin T. Ryan (ID # 316602)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601

Kimberly A. Klock (ID # 89716)
Michael J. Shafer (ID # 205681)
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101

For PPL Electric Utilities Corporation

/s/ Phillip D. Demanchick

Date: September 3, 2020

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

For Office of Consumer Advocate

_____/s/ Mark Szybist_____
Mark C. Szybist, Esquire
1152 15th Street, NW, Suite 300
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Natural Resources Defense Council

Date: September 3, 2020

Andrew J. Karas, Esquire
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Fair Shake Environmental Legal Services
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For Natural Resources Defense Council

Kenneth L. Mickens, Esquire
316 Yorkshire Drive
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Date: _____

For Sustainable Energy Fund

Date: _____

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Akron, OH 44302

For Natural Resources Defense Council



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

Date: 9-1-20

For Sustainable Energy Fund


Appendix A

PPL Electric's Verifications for Rejoinder Testimony and Exhibits

VERIFICATION

I, SALIM SALET, being Director – Operations at PPL Electric Utilities Corporation, hereby state that the facts above set forth in PPL Electric Statement No. 1-RJ and PPL Electric Exhibit SS-1RJ are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 8/31/2020

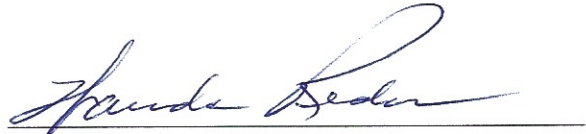


Salim Salet

VERIFICATION

I, WANDA REDER, being the President and CEO of Grid-X Partners, LLC, hereby state that the facts above set forth in PPL Electric Statement No. 2-RJ are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

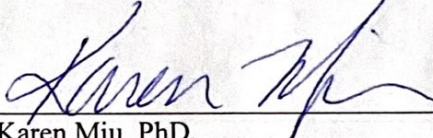
Date: 9-1-2020


Wanda Reder

VERIFICATION

I, KAREN MIU, PhD., hereby state that the facts above set forth in PPL Electric Statement No. 3-RJ and PPL Electric Exhibit KM-1RJ are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 8/31/2020

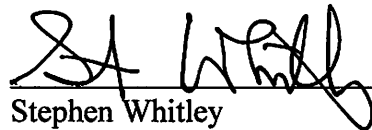


Karen Miu, PhD.

VERIFICATION

I, STEPHEN WHITLEY, hereby state that the facts above set forth in PPL Electric Statement No. 4-RJ are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: Sep 1, 2020




Stephen Whitley

VERIFICATION

I, MATTHEW WALLACE, being Senior Engineer at PPL Electric Utilities Corporation, hereby state that the facts above set forth in PPL Electric Statement No. 6-RJ and PPL Electric Exhibits MW-1RJ and MW-2RJ are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 8/31/2020

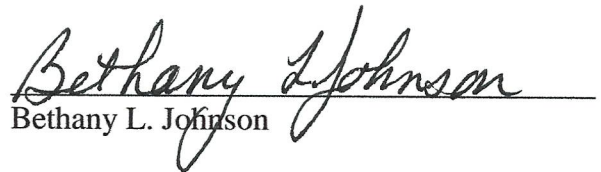


Matthew Wallace

VERIFICATION

I, BETHANY L. JOHNSON, being Manager – Regulatory Operations at PPL EU Services Corporation, hereby state that the facts above set forth in PPL Electric Statement No. 7-RJ and PPL Electric Exhibit BLJ-1RJ are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 09/01/2020


Bethany L. Johnson