



September 17, 2020

KENNETH L. MICKENS, ESQUIRE LLC
LEGAL CONSULTING

E-FILING

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

**Re: Petition of PPL Electric Utilities Corporation for Approval
of a Default Service Plan for the Period from June 1, 2021
through May 31, 2025
Docket No. P-2020-3019356
Sustainable Energy Fund's Statement in Support of Joint Petition for
Approval of Partial Settlement**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Sustainable Energy Fund's Statement in Support of Joint Petition for Approval of Partial Settlement which has been filed with the Commission today. Copies have been served on all known parties to this proceeding. A Certificate of Service is attached. Please contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kenneth L. Mickens".

Kenneth L. Mickens, Esquire
Attorney for Sustainable
Energy Fund

KLM/bls
Certificate of Service
Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**Sustainable Energy Fund
Statement in Support of
Joint Petition for Approval of
Partial Settlement**

To the Honorable Elizabeth H. Barnes, Administrative Law Judge:

The Sustainable Energy Fund (“SEF”)¹, by and through its Attorney, submits that the terms of the foregoing Joint Petition for Approval of Partial Settlement (“Joint Petition”) are in the public interest and represent a fair, just, reasonable and equitable balance of the interests of PPL Electric Utilities Corporation (“PPL Electric” or “Company”) and its customers. After settlement discussions, SEF, PPL Electric and the other Signatory Parties have agreed upon the terms embodied in the foregoing Joint Petition.

¹ SEF is a non-profit organization dedicated to the use of renewable energy, clean energy technologies, energy conservation and energy education. Founded in 1999 pursuant to a settlement of PPL Electric

I. BACKGROUND

SEF submits that the foregoing Joint Petition is in the public interest for the following reasons:

1. On March 25, 2020, PPL Electric filed with the Pennsylvania Public Utility Commission (“Commission”) a Petition for Approval of its Default Service Plan (“DSP V”) (“Petition”). In the Petition, PPL Electric requests approval of its fifth Default Service Plan to establish the conditions under which PPL Electric will acquire and supply default service or provider of last resort service (“Default Service”).

2. SEF filed a timely Petition to Intervene. A Prehearing Conference was held on May 15, 2020, at which time a litigation schedule was set. An evidentiary hearing was held in this proceeding on August 13, 2020, at which time SEF Statement No. 1 and SEF Statement No. 1-SR were admitted to the record.

3. Settlement discussions resulted in the foregoing Joint Petition.

II. SETTLEMENT TERMS

4. The specific details of the Settlement terms are provided in Paragraphs 16 through 29 of the Joint Petition. However, SEF initially observes that the settlement enhances PPL Electric’s relationship with its customers because under the terms of the Joint Petition, PPL Electric has agreed to withdraw its proposed Renewable Energy Rider. This result helps to ensure that PPL Electric’s

Utility Corporation’s electric deregulation proceeding, SEF promotes clean and renewable energy initiatives to benefit customers within the PPL Electric service territory and throughout Pennsylvania.

customers will have the opportunity to effectively assess their energy usage and possibly reduce their energy costs by modifying their energy use profile without unnecessary restrictions.

III. PUBLIC INTEREST

5. SEF submits that the foregoing Joint Petition is in the public interest for the following reasons:

(a). Time-of-Use (“TOU”) Analysis: Under the terms of the Joint Petition, PPL Electric agrees to perform additional analysis and reporting on the TOU program in its next DSP proceeding. Such analysis will focus on evaluating the appropriate on-peak hours for the next DSP TOU program. PPL Electric has also agreed to include certain information on its website designed to help customers who are limited in their ability to reduce usage during certain hours of the day determine whether they can benefit from TOU rates. In addition, PPL Electric has agreed to include information on its website which informs low income customers that rate programs other than TOU may be more appropriate for their circumstances.

(b). Discontinue Litigation: The Joint Petition discontinues expensive and unnecessary rate litigation and administrative burden.

6. The foregoing Joint Petition addresses and adjusts all substantial issues that are the subject of dispute. It appears unlikely that full litigation of these matters would result in SEF obtaining a superior outcome.

7. SEF supports the foregoing Joint Petition because it is in the public interest. However, in the event this matter proceeds to full litigation, SEF is prepared to take litigation positions that may differ from the terms of the proposed Joint Petition for Approval of Partial Settlement.

Respectfully submitted,



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Dated: September 17, 2020

CERTIFICATE OF SERVICE
Docket No. P-2020-3019356

I hereby certify that I have this day served a copy of the foregoing Sustainable Energy Fund's Statement in Support of Joint Petition for Approval of Partial Settlement via email upon the following participants in accordance with the requirements of 52 Pa. Code Section 1.54, *et. seq.* (*relating to service by a participant*):

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Dated: September 17, 2020