
Lindsay A. Berkstresser
Associate

lberkstresser@postschell.com
717-612-6021 Direct
717-731-1977 Direct Fax
File #: 178868

November 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 Its Default Service
Plan for the Period of June 1, 2021 through May 31, 2025
Docket No. P-2020-3019356**

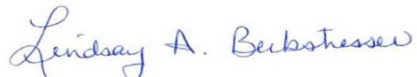
Dear Secretary Chiavetta:

On November 2, 2020, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) filed its Replies to the Other Parties’ Exceptions in the above referenced proceeding. After filing, PPL Electric noticed a minor error in the heading for Section II.C.1. Specifically, the terms “5 CP” and “1 CP” were inadvertently switched.

Accordingly, PPL Electric respectfully submits this Errata to the Company’s Replies to the Other Parties’ Exceptions, containing corrected copies of pages ii and 21 where that heading appears.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Lindsay A. Berkstresser

LAB/jl

Enclosures

cc: Office of Special Assistants
Honorable Elizabeth Barnes

Rosemary Chiavetta, Secretary
November 3, 2020
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Certificate of Service

CERTIFICATE OF SERVICE

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) and the Pennsylvania Public Utility Commission's March 20, 2020 Emergency Order at Docket No. M-2020-3019262.

VIA E-MAIL

David T. Evrard, Esquire
Aron J. Beatty, Esquire
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
devrard@paoca.org
abeatty@paoca.org

Gina L. Miller, Esquire
PA Public Utility Commission
Bureau of Investigation & Enforcement
400 North Street, 2nd Floor West
P.O. Box 3265
Harrisburg, PA 17105-3265
ginmiller@pa.gov

Steven C. Gray, Esquire
Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov

Todd S. Stewart, Esquire
Hawke McKeon & Sniscak LLP
100 N. 10th Street
Harrisburg, PA 17101
tsstewart@hmslegal.com
*Counsel for Intervenors
EGS Parties*

Kenneth L. Mickens, Esquire
316 Yorkshire Drive
Harrisburg, PA 17111
Kmickens11@verizon.net
*Counsel for Intervenor
Sustainable Energy Fund*

Pamela Polacek, Esquire
Adeolu A. Bakare, Esquire
Jo-Anne S. Thompson, Esquire
McNees, Wallace & Nurick
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108-1166
ppolachek@mcneeslaw.com
abakare@mcneeslaw.com
jthompson@mcneeslaw.com
Counsel for Intervenor PPLICA

Elizabeth R. Marx, Esquire
John W. Sweet, Esquire
Ria Pereira, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
emarxpulp@palegalaid.net
Counsel for Intervenor CAUSE-PA

Deanne M. O'Dell, Esquire
Kristine E. Marsilio, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th floor
Harrisburg, PA 17101
dodell@eckertseamans.com
kmarsilio@eckertseamans.com
*Counsel for Intervenor Starion Energy PA,
Inc.*

Gregory L. Peterson, Esquire
Thomas F. Puchner, Esquire
Kevin C. Blake, Esquire
Phillips Lytle LLP
201 West Third Street, Suite 205
Jamestown, NY 14701-4907
gpeterson@phillipslytle.com
Counsel for Intervenor StateWise

Derrick Price Williamson, Esquire
Barry A. Naum, Esquire
Spilman Thomas & Battle
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com
Counsel for Intervenor IECPA

Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
rdk@indecon.com
Consultant for OSBA

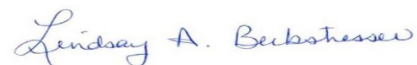
Barbara Alexander
Consumer Affairs Consultant
83 Wedgewood Drive
Winthrop, ME 04364
barbalex@ctel.net
Consultant for OCA

John F. Lushis, Jr., Esquire
Norris McLaughlin P.A.
515 West Hamilton Street, Suite 502
Allentown, PA 18101
jlushis@norris-law.com
*Counsel for Intervenor Calpine Retail
Holdings LLC*

Lauren M. Burge, Esquire
Deanne M. O'Dell, Esquire
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com
Counsel for Intervenor Inspire Energy

Dr. Steven L. Estomin
Dr. Serhan Ogur
Exeter Associates, Inc., Suite 300
10480 Little Patuxent Parkway
Columbia, MD 21044
sogur@exeterassociates.com
sestomin@exeterassociates.com
Consultants for OCA

Date: November 3, 2020



Lindsay A. Berkstresser

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the Commission Has Jurisdiction, PPL Electric Should Use the 5 CP Methodology Instead of the 1 CP Methodology

The ALJ correctly concluded that “the Commission has no jurisdiction to require PPL Electric to change its method for allocating transmission costs from a 5 CP methodology for determining NPSL, to a 1 CP methodology and recalculate NITS rates accordingly.” (RD at 38.) Importantly, the ALJ appropriately delineated between what PPLICA and IECPA have attempted to challenge in this proceeding (*i.e.*, the use of the 5 CP methodology to calculate an LSE’s Network Service Peak Load (“NSPL” or “NITS tag”) used by PJM to determine its network integration transmission service charge (“NITS”)) and what the Commission has jurisdiction over (*i.e.*, the allocation of transmission costs to retail customers through PPL Electric’s Transmission Service Charge (“TSC”)). (*See* RD at 38-39.)

In their Joint Exceptions, PPLICA and IECPA argue that the ALJ erred by concluding that the Commission lacked jurisdiction over their request to modify “PPL’s calculation of customers’ NSPL to use a 1 CP” methodology. (PPLICA-IECPA Exceptions, p. 3.) However, as explained below and in PPL Electric’s Briefs, both PPLICA and IECPA conflate (1) the payment of NITS charges by an LSE, which are calculated using an NSPL with (2) the allocation of transmission charges to retail electric service customers through either (a) PPL Electric’s TSC for default service customers or (b) the private electric supply service contract between an EGS and a shopping customer. (PPL MB at 43-46; PPL RB at 28-30.)

PPL Electric fully explained the functions of PJM Interconnection LLC (“PJM”), PPL Electric as a transmission owner, and the role of LSEs in its Main Brief. (*See* PPL MB at 43-35.) Also, on page 44 of its Main Brief, PPL Electric provided a graphical depiction of these functions, reproduced below, which identified the aspects of the market challenged by PPLICA and IECPA.