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Devin Ryan

dryan@postschell.com  
717-612-6052 Direct  
717-731-1985 Direct Fax  
File #: 179373

December 14, 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: Implementation of the Alternative Energy Portfolio Standards Act of 2004:  
Standards for the Participation of Demand Side Management Resources - Technical  
Reference Manual 2021 Update  
Docket No. M-2019-3006867**

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Dear Secretary Chiavetta:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) respectfully submits this letter in lieu of formal comments on the Pennsylvania Public Utility Commission’s (“Commission”) 2021 Technical Reference Manual (“TRM”) Update Amendment Tentative Order entered in the above-captioned proceeding. The sole purpose of this letter is to identify an issue with a default Demand Savings (kW) value contained in Section 3.9.3 of the proposed 2021 TRM Update, Volume 3.

Section 3.9.3 of the proposed 2021 TRM Update, Volume 3 concerns Advanced Power Strips. In that section, Table 3-168 sets forth the Terms, Values, and References for Smart Strip Plug Outlets, Table 3-169 outlines the Impact Factors for APS Strip Types, and Table 3-170 provides the Default Savings for APS Strip Types.

Based on the Company’s review of those tables, PPL Electric believes that the default Demand Savings (kW) for Tier 2 Workstations in Table 3-170 should be 0.015, not 0.017. The Company reached this conclusion by multiplying the *Demand<sub>workstation</sub>* value of 0.062 kW in Table 3-168 by the Tier 2 Workstation ERP<sub>peak</sub> value of 23.4% in Table 3-169. That calculation results in Demand Savings of 0.015.

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Thus, through this letter, PPL Electric respectfully requests that the Commission correct Table 3-170 in Section 3.9.3 of the proposed 2021 TRM Update, Volume 3, as described previously.

Copies of this letter are being provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DTR/jl  
Enclosure

cc: Certificate of Service  
Adam Young  
Joseph Sherrick

**CERTIFICATE OF SERVICE  
(Docket No. M-2019-3006867)**

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**

Donna Clark, Esquire  
Energy Association of PA  
800 North 3<sup>rd</sup> Street, Suite 205  
Harrisburg, PA 17102  
[dclark@energypa.org](mailto:dclark@energypa.org)

Sara Aaserud, Engineer  
Franklin Energy  
7910 Rae Blvd.  
Victor, NY 14564  
[saaserud@franklinenergy.com](mailto:saaserud@franklinenergy.com)

Jack Garfinkle, Esquire  
Exelon Business Services Company  
2301 Market Street  
Legal Dept. S23-1  
Philadelphia, PA 19103  
[Jack.garfinkle@exeloncorp.com](mailto:Jack.garfinkle@exeloncorp.com)

Scott Von Kleeck, CEO  
Performance Systems Development  
40 W. Evergreen Avenue, Suite 110  
Philadelphia, PA 19119  
[svonkleeck@psdconsulting.com](mailto:svonkleeck@psdconsulting.com)

John L. Munsch, Esquire  
FirstEnergy  
800 Cabin Hill Drive  
Greensburg, PA 15601  
[jmunsch@firstenergycorp.com](mailto:jmunsch@firstenergycorp.com)

Terrance J. Fitzpatrick, President & CEO  
Energy Association of PA  
800 North 3<sup>rd</sup> Street  
Harrisburg, PA 17102  
[tfitzpatrick@energypa.org](mailto:tfitzpatrick@energypa.org)  
[ngrear@energypa.org](mailto:ngrear@energypa.org)  
[dkitner@energypa.org](mailto:dkitner@energypa.org)

Lindsay Baxter  
Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219  
[lbaxter@duqlight.com](mailto:lbaxter@duqlight.com)

Thad Carson,  
Director Business Development  
TrickleStar, Inc.  
4859 Kendrick Street SE  
Grand Rapids, MI 49512  
[Thad.carlson@tricklestar.com](mailto:Thad.carlson@tricklestar.com)

Mary Sprayregen  
Director of Regulatory Affairs  
Oracle  
2311 Wilson Blvd.  
Arlington, VA 22201  
[Mary.sprayregen@oracle.com](mailto:Mary.sprayregen@oracle.com)

**VIA FIRST CLASS MAIL**

Eric Truskoski, Esquire  
Bradford White Corporation  
725 Talamore Drive  
Ambler, PA 19002-1873

Patrick McDonnell, Acting Secretary  
Department of Environmental Protection  
Rachel Carson State Office Building  
PO Box 2063  
Harrisburg, PA 17105-2063

Date: December 14, 2020



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Devin T. Ryan