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January 6, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

**RE: Petition of PPL Electric Utilities Corporation For Approval of its Act 129 Phase IV
Energy Efficiency and Conservation Plan; Docket No. M-2020-3020824**

Dear Secretary Chiavetta:

Attached please find for filing with the Pennsylvania Public Utility Commission the Petition to Intervene on behalf of the PP&L Industrial Customer Alliance ("PPLICA"), in the above-referenced proceeding.

As shown by the attached Certificate of Service and per the Commission's March 20, 2020, Emergency Order, all parties to this proceeding are being duly served via email only due to the current COVID-19 pandemic. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy of this pleading upon request.

Sincerely,

McNEES WALLACE & NURICK LLC

By 

Adeolu A. Bakare

Counsel to the PP&L Industrial Customer Alliance

c: Deputy Chief Administrative Law Judge Mark A. Hoyer (via E-mail)
Administrative Law Judge Emily DeVoe (via E-mail)
Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

VIA FIRST-CLASS MAIL

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Certificate of Service

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Adeolu A. Bakare

Counsel to the PP&L Industrial Customer Alliance

Dated this 6th day of January, 2021, at Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
For Approval of its Act 129 Phase IV Energy : Docket No. M-2020-3020824
Efficiency and Conservation Plan :

**PETITION TO INTERVENE
OF THE PP&L INDUSTRIAL CUSTOMER ALLIANCE**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Sections 5.71 through 5.74 and Section 5.61(a) of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71-5.74 and 52 Pa. Code § 5.61(a), the PP&L Industrial Customer Alliance hereby files this Petition to Intervene in response to the above-captioned filing of PPL Electric Utilities Corporation ("PPL" or "Company").

On November 30, 2020, PPL petitioned the Commission for approval of the Company's Phase IV Energy Efficiency & Conservation ("EE&C") Plan ("Phase IV Plan"). PPL's Petition for Approval of its Phase IV Plan ("Petition") outlines PPL's proposal to address the requirements of Act 129, the PUC's Phase IV Implementation Order entered on June 18, 2020, at Docket No. M-2020-30125228 ("Implementation Order"), through programs designed to achieve an overall 1,250,157 MWh consumption reduction, and a 229 MW peak demand reduction. *See* Petition, p. 5.

The proposed Phase IV Plan portfolio includes Residential, Low-Income, and Non-Residential programs. The Non Residential program includes separate Efficient Energy and Custom components for Small Commercial and Industrial ("C&I") and Large C&I customers, respectively. *See id.* at 11.

As with the Phase III EE&C Plan, PPL proposes to recover all costs through a fully reconcilable, non-bypassable charge under Section 1307 of the Public Utility Code. *See id.* at 18. The total proposed charges for the Large C&I customer class are \$99,943,535, or approximately 32% of total costs for PPL's Phase IV Plan. *See* Petition, Exhibit 1, p. 23.

For the proposed non-bypassable charge, or Phase IV Act 129 Compliance Rider ("ACR IV"), PPL intends to establish separate recovery charges for each customer class in proportion to the cost of the programs targeting that class. *See* Petition, p. 18. For multi-class programs, PPL proposes to allocate costs using an allocation factor (*i.e.*, a percentage equal to the actual EE&C costs directly assigned to each customer class divided by the actual EE&C costs assigned to all customer classes). *See id.*

As a result, PPL's Phase IV Plan costs and program measures may impact the rates and services of PPL's largest customers. It is therefore imperative that PPL implement its Phase IV EE&C Plan in a just and reasonable manner, consistent with Act 129, the Implementation Order, and all applicable statutes and regulations.

In support of its Petition to Intervene, PPLICIA asserts the following:

PPLICIA is an *ad hoc* association of energy-intensive commercial and industrial customers receiving electric service in PPL's service territory, primarily under Rate Schedules LP-4, LP-5 and IS-P, as well as available riders.¹ PPLICIA members collectively consume approximately 1.04 billion kWh of electricity each year in manufacturing and other operational processes, and these electric costs are a significant element of their respective costs of operation. Any modification to PPL's electric rates may impact PPLICIA members' cost of operations.

¹ Some PPLICIA members also have accounts on Rate Schedules GS-1 and GS-3.

1. The names and address of PPLICA's attorneys are:

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2. For purposes of this proceeding, PPLICA includes the members listed in Appendix A hereto. As necessary, PPLICA will update Appendix A during the course of this proceeding to reflect any changes in its membership.


3. PPLICA members are concerned with issues regarding the terms and conditions of their electricity service, and, as a result, have been actively involved in numerous PPL proceedings, including fully participating in the adjudication of PPL's Phase I Phase II, and Phase III EE&C Plans and regularly attending PPL's EE&C Plan stakeholder meetings. The Commission's final disposition of PPL's Phase IV Plan may also directly affect the rates that the Company imposes on PPLICA members for service.

4. PPLICA members thus have an interest in this proceeding that is not represented by any other party of record; consequently, PPLICA satisfies the standards for intervention under Section 5.72 of the Commission's Regulations, 52 Pa. Code § 5.72.

WHEREFORE, the PP&L Industrial Customer Alliance respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene, provide PPLICA with full-party status in this proceeding, and grant such other relief as it deems necessary.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Counsel to the PP&L Industrial Customer
Alliance

Dated: January 6, 2021

APPENDIX A

PP&L INDUSTRIAL CUSTOMER ALLIANCE

Air Products and Chemicals, Inc.
General Dynamics-OTS Scranton
Harristown Enterprises, Inc.
Hercules Cement Company
Hydro Extrusion
Messer LLC
TIMET North America
Wegmans Food Markets, Inc.

