



February 8, 2021

KENNETH L. MICKENS, ESQUIRE LLC
LEGAL CONSULTING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
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
Comments of Sustainable Energy Fund concerning PPL Electric's
DER Management Pilot Implementation Plan filed January 19, 2021**

Dear Secretary Chiavetta:

Enclosed please find the Comments of Sustainable Energy Fund for filing in the above-referenced proceeding. Please contact me if you have any questions concerning this matter.

Sincerely,

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

Kenneth L. Mickens, Esq.

Attorney for Sustainable Energy Fund

KLM/bls

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**Sustainable Energy Fund
Comments to PPL Electric’s DER
Management Pilot Implementation Plan**

The Sustainable Energy Fund (“SEF”)¹, by and through its Attorney, submits these Comments to PPL Electric’s DER Management Pilot Implementation Plan (“Pilot Implementation Plan”) filed with the Commission at this docket on January 19, 2021. SEF’s Comments are presented based upon the issues as outlined in the Table of Contents in PPL Electric’s Pilot Implementation Plan.

II. A. Objectives

SEF submits that PPL Electric misrepresents the objective of the DER Management Pilot Program. In fact, the purpose of the Pilot is to determine the cost and benefits for ratepayers, not PPL Electric. In this regard, the control of the

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 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.

DERs may or may not be beneficial to PPL Electric, but it is the ratepayer impact that is most important.

II. E. 2 Approved List of Smart Inverters

PPL Electric's DER management device is incompatible with Enphase Inverters, one of the most popular inverters on the market. As of the recent conference call among the parties in this proceeding, PPL Electric has yet to solve the technical issues in communicating with Enphase inverters. Since Enphase is one of the most popular inverters on the market, it would be inappropriate to proceed with the Pilot under these circumstances because the Pilot would not capture an entire communication class. In addition, PPL Electric has only approved inverters from eight (8) manufacturers, with Solar Edge just being added during the previously mentioned conference call between the parties. However, the Solar Edge inverters approved by PPL Electric are incomplete. For example, PPL Electric only approved the H-US series of inverters designed for residential systems and the KUS inverters designed for 3-phase systems. For residential customers alone, the approval does not include the H-RW, M-RW, and K-RW series inverters.

The parties to the Settlement in this proceeding were assured by PPL Electric that it would approve significantly more inverters than currently authorized. Based upon the limited number of inverters approved by PPL Electric to date, SEF has serious concerns that the PPL Electric strategy will negatively impact the solar photovoltaic market within its territory, including solar inverter

impact the solar photovoltaic market within its territory, including solar inverter manufacturers being able to sell their products in the PPL Electric territory. Consequently, until PPL Electric approves more inverters representing a more significant market share, SEF believes that it is inappropriate to move forward with the Pilot.

F. 3. Use Cases

PPL Electric has proposed modifying the use cases for system restoration and DER operation in emergency conditions and in active work zones. However, SEF submits that modifications to these use cases should be reviewed with the parties in this proceeding prior to implementation. In addition, SEF has significant concerns that PPL Electric is unaware of the existence of solar systems with battery storage or battery storage systems in general on its distribution system. As the DER Management Plan is currently constituted, PPL Electric could modify its approach to shut-down inverters appropriately disconnected from the distribution system. Under this scenario, PPL Electric could endanger the life of ratepayers that utilize energy storage systems to provide uninterrupted service in the event of the failure of PPL Electric's distribution system. SEF fully understands PPL Electric's concern for the safety of its workers, but these workers can still be provided safe access to the distribution circuits without unnecessarily endangering the lives of ratepayers who may be using solar plus storage to power durable medical equipment. PPL Electric should not be permitted to modify the

methodology to use cases without consulting with the parties to this proceeding to ensure that PPL Electric's actions are consistent with the instant Settlement.

John M. Costlow

President

Sustainable Energy Fund

Dated: February 8, 2021

AFFIDAVIT

I, John M. Costlow, certify that I am President/CEO of the Sustainable Energy Fund and that, in said capacity, I am authorized to and do make this Affidavit for it, that the facts set forth in the foregoing Comments to PPL Electric's DER Management Pilot Implementation Plan are true and correct to the best of my knowledge, information and belief. I understand that false statements made herein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.



John M. Costlow
President/CEO
Sustainable Energy Fund

Dated: February 8, 2021

CERTIFICATE OF SERVICE
(Docket No. P-2019-3010128)

I hereby certify that a true and correct copy of the foregoing SEF Comments to PPL Electric's DER Management Pilot Implementation Plan have 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).

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Date: February 8, 2021