

February 9, 2021

## Via Electronic Filing

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

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

Secretary Chiavetta:

Enclosed for filing please find the **Verifications of Alice Napoleon and Kenji Takahashi**, on behalf of the Natural Resources Defense Council, in the above-captioned proceeding

Copies will be circulated in accordance with the attached Certificate of Service.

Sincerely,

/s/ James M. Van Nostrand
James M. Van Nostrand
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Counsel to Natural Resources Defense Council

**Enclosures** 

cc: Certificate of Service

# BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities

Corporation for Approval of its Act 129

Phase IV Energy Efficiency and

Conservation Plan

M-2020-3020824

### VERIFICATION OF ALICE NAPOLEON

- I, Alice Napoleon, hereby state and verify the following:
- 1. I am a Senior Associate at Synapse Energy Economics, Inc.
- I have submitted in this proceeding, through counsel, written direct testimony, NRDC Statement No. 1, Direct Testimony of Alice Napoleon and Kenji Takahashi, including NRDC Exhibits AN/KT-1 and AN/KT-2.
- In lieu of my appearance at hearing in this matter, I am offering NRDC Statement No. 1 into evidence at hearing through the statements set forth in this verification.
- 4. If I were called to testify at hearing, the answers to the questions I gave in NRDC Statement No. 1 would be the answers given by me at hearing in response to those same questions.
- The facts set forth in my answers contained in NRDC Statement No. 1 are true and correct and represent my answers to those questions.

6. There are no additions, corrections, or deletions I would propose to NRDC Statement No. 1.

Alice Napoleon

Date: February 8, 2021.

# BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities

Corporation for Approval of its Act 129

Phase IV Energy Efficiency and

M-2020-3020824

Conservation Plan

:

#### VERIFICATION OF KENJI TAKAHASHI

- I, **Kenji Takahashi**, hereby state and verify the following:
- 1. I am a Senior Associate at Synapse Energy Economics, Inc.
- 2. I have submitted in this proceeding, through counsel, written direct testimony, NRDC Statement No. 1, Direct Testimony of Alice Napoleon and Kenji Takahashi, including NRDC Exhibits AN/KT-1 and AN/KT-2.
- 3. In lieu of my appearance at hearing in this matter, I am offering NRDC Statement No. 1 into evidence at hearing through the statements set forth in this verification.
- 4. If I were called to testify at hearing, the answers to the questions I gave in NRDC Statement No. 1 would be the answers given by me at hearing in response to those same questions.
- 5. The facts set forth in my answers contained in NRDC Statement No. 1 are true and correct and represent my answers to those questions.
- 6. There are no additions, corrections, or deletions I would propose to NRDC Statement No. 1.

  \*\*Markatalia\*\*

  \*\*Constructions\*\*

  \*\*Constructions\*

Kenji Takahashi

Date: February 8, 2021.

## **CERTIFICATE OF SERVICE**

Petition of PPL Electric Utilities Corporation :

for Approval of its Act 129 Phase IV Energy : Docket No. M-2020-3020824

Efficiency and Conservation Plan :

I hereby certify that this day I served a copy of the response of the Natural Resources Defense Council to PPL Electric Utilities Corporation's First Set of Interrogatories in accordance with the requirements of 52 Pa. Code § 1.54 and consistent with the Commission's March 20 Emergency Order at Docket M-2020-3019262.

#### Via Electronic Mail

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Deputy Chief Administrative Law Judge
Hon. Emily DeVoe

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Date: February 9, 2021 /s/ Blake Elder
Blake Elder

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