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March 1, 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 Reply Comments 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 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

## 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).

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Page 2

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Adeolu A. Bakare

Counsel to the PP&L Industrial Customer Alliance

Dated this 1<sup>st</sup> day of March, 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           :  
Efficiency and Conservation Plan                        :

Docket No. M-2020-3020824

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**REPLY COMMENTS OF THE  
PP&L INDUSTRIAL CUSTOMER ALLIANCE**

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Dated: March 1, 2021

**TABLE OF CONTENTS**

	<b>Page</b>
<b>I. INTRODUCTION.....</b>	<b>1</b>
<b>II. COMMENTS.....</b>	<b>1</b>
<b>III. CONCLUSION .....</b>	<b>3</b>

## **I. INTRODUCTION**

On November 30, 2020, PPL Electric Utilities Corporation's ("PPL Electric" or "Company") petitioned the Pennsylvania Public Utility Commission ("PUC" or "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 and the PUC's Phase IV Implementation Order.<sup>1</sup> *See* Petition, p. 1.

Pursuant to the procedural schedule established in this proceeding, parties were permitted to submit Comments between January 22, 2021, and January 25, 2021, with Reply Comments due March 1, 2021. As discussed more fully in Section II, *infra*, PP&L Industrial Customer Alliance ("PPLICA") submits these Reply Comments to respond to a specific issue raised in the Comments of Ceres, which argued that Electric Distribution Companies ("EDCs") should be mandated to continue to spend their Phase IV Act 129 budgets even after the EDCs' Phase IV goals are met.<sup>2</sup> For the reasons detailed below, PPLICA respectfully requests that the Commission deny Ceres' recommendation and confirm that, as discussed in the Implementation Order,<sup>3</sup> the PUC will permit EDCs to spend their Phase IV budgets after their Phase IV goals have been met, but such spending is not required by the Commission.

## **II. COMMENTS**

In the Comments filed by Ceres on January 25, 2021, Ceres asked that the Commission consider a number of recommendations, including that the Commission mandate EDCs to continue spending their Phase IV budgets on their EE&C Programs even after attaining the required

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<sup>1</sup> *Energy Efficiency and Conservation Program*; Docket No. M-2020-3015228, Implementation Order (June 18, 2020) ("Implementation Order").

<sup>2</sup> Ceres filed substantially similar Comments in all of the various EDC Phase IV EEC proceedings.

<sup>3</sup> Implementation Order, pp. 131-132.

Phase IV EEC targets. What Ceres fails to recognize, however, is that the Commission has already considered and rejected this mandate in the Implementation Order.<sup>4</sup> During the PUC's contemplation of Phase IV implementation processes and procedures, Ceres, along with the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania ("CAUSE-PA"), Keystone Energy Efficiency Alliance ("KEEA"), and Regional Housing Legal Services (collectively, "PA-EEFA"), made the very same suggestion.<sup>5</sup> The Commission directly rejected this suggestion, stating that "[f]or Phase IV of Act 129, we will not adopt the suggestions put forth by PA EEFA, CAUSE-PA, Ceres, or KEEA, as they are contrary to the EE&C Plan limitations on costs."<sup>6</sup> As nothing has changed between the issuance of the Phase IV Final Implementation Order in June 2020 and the consideration of PPL's Phase IV EE&C Plan proposal, a change in the Commission's recent decision is not warranted. Accordingly, the Commission must deny Ceres' recommendation and, instead, confirm that EDCs are not mandated to continue to spend their Phase IV budget after meeting their Phase IV targets.

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<sup>4</sup> *Id.*

<sup>5</sup> *Id.* at 131.

<sup>6</sup> *Id.*

**III. CONCLUSION**

**WHEREFORE**, the PP&L Industrial Customer Alliance respectfully request that the Pennsylvania Public Utility Commission deny Ceres' recommendation for the reasons set forth in the above Reply Comments.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By  \_\_\_\_\_

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Dated: March 1, 2021