



August 31, 2021

VIA ELECTRONIC FILING

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

Re: Policy Proceeding—Utilization of Storage Resources as Electric Distribution Assets
Docket No. M-2020-3022877

Dear Secretary Chiavetta,

Attached for electronic filing please find the Motion for Extension of Clean Air Council, Sierra Club, Philadelphia Solar Energy Association, POWER Interfaith, the Union of Concerned Scientists, and the Natural Resources Defense Council. Copies have been served per the attached Certificate of Service.

Sincerely,

/s/ Devin McDougall

PA Attorney ID No. 329855

Senior Attorney

Earthjustice

1617 John F. Kennedy Blvd., Suite 1130

Philadelphia, PA 19103

dmcDougall@earthjustice.org

(917) 628-7411

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Policy Proceeding—Utilization of Storage
Resources as Electric Distribution Assets**

Docket No. M-2020-3022877

MOTION FOR EXTENSION

Pursuant to Sections 1.15 and 5.103 of the Pennsylvania Administrative Code, Clean Air Council, Sierra Club, Philadelphia Solar Energy Association, POWER Interfaith, the Union of Concerned Scientists, and the Natural Resources Defense Council (“Movants”) hereby file this Motion for an Extension of Time for Comments (“Motion”) in the above-captioned proceeding.

Through this Motion, Movants respectfully request that the Pennsylvania Public Utility Commission (“Commission”) extend the deadline for the filing of comments for a period of sixty (60) days, from September 27, 2021 to November 26, 2021. In support of this Motion, Movants provide the following:

1. On December 3, 2020, the Commission issued a Secretarial Letter in the above-captioned docket seeking public comment on three (3) questions addressing threshold issues relating to the potential role of energy storage as a distribution asset.

2. On December 28, 2020, the Office of Consumer Advocate (“OCA”) filed a motion requesting a 30-day extension of the comment deadline. The motion was supported by the Commission’s Bureau of Investigation and Enforcement (“I&E”), the Office of Small Business Advocate (“OSBA”), the Energy Association of Pennsylvania (“EAP”), the Industrials, Natural Resources Defense Council (“NRDC”) and Earthjustice.

3. On December 30, 2020, the Commission granted OCA’s motion, establishing February 18, 2021 as the new deadline for comments.

4. On or before February 18, 2021, twenty-one (21) parties submitted comments to the Commission in response to the December 3, 2020 Secretarial Letter.

5. On August 12, 2021, the Commission issued a second Secretarial Letter (“Second Secretarial Letter”) on the above-captioned docket seeking public comment on an additional seven (7) questions relating to energy storage as a distribution asset. These questions address

more detailed implementation questions than the first set of questions, including technical parameters for energy storage deployment, lessons learned from utility pilots on energy storage, the design of cost-recovery mechanisms for energy storage, participation in federally-regulated wholesale markets by energy storage, and implementation of energy storage aggregation rules pursuant to Order No. 2222 of the Federal Energy Regulatory Commission.

6. The Second Secretarial Letter was published in the Pennsylvania Bulletin on August 28, 2021, making the deadline for comments September 27, 2021.

7. The time afforded by this deadline is too short to adequately address the number, depth, and complexity of the questions in the Commission's Second Secretarial Letter, which implicate novel and highly technical questions of state and federal jurisdiction, technology, and market economics.

8. Furthermore, the September 27, 2021 deadline is one day before the inaugural meeting of the Pennsylvania Energy Storage Consortium, which the Department of Environmental Protection has established as a forum to advance storage as a solution for a modern, resilient, low-carbon electricity grid in Pennsylvania. The Movants intend to participate in that meeting on September 28, 2021, and believe the discussion will generate technical data and other valuable information that the Movants will need time to review and to incorporate into their comments in response to the Second Secretarial Letter.

9. The Movants also plan to meet with other parties to this proceeding to seek common ground, share technical information, and attempt to narrow the issues for decision in this docket.

10. To ensure that the Commission is provided with the best and most-developed possible record as it considers the complex questions in the Second Secretarial Letter, the

Movants respectfully request an extension of the deadline for comments by sixty (60) days, or until November 26, 2021.

11. The Movants are supported in this request by OCA, the Energy Storage Association (“ESA”), the Retail Energy Supply Association (“RESA”), the Pennsylvania Energy Consumer Alliance (“PECA”), the Met-Ed Industrial Users Group (“MEIUG”), the Penelec Industrial Customer Alliance (“PICA”), the Philadelphia Area Industrial Energy Users Group (“PAIEUG”), the PP&L Industrial Customer Alliance (“PPLICA”), and the West Penn Power Industrial Intervenors (“WPPII”).

WHEREFORE, the Movants respectfully request that the Commission extend the deadline for the filing of comments by sixty (60) days until November 26, 2021. The Movants appreciate the Commission's consideration of this request.

Dated: August 31, 2021

Respectfully submitted,

/s/ Devin McDougall

PA Attorney ID No. 329855

Senior Attorney

Earthjustice

1617 John F. Kennedy Blvd., Suite 1130

Philadelphia, PA 19103

dmcDougall@earthjustice.org

*Counsel for Clean Air Council, Sierra Club,
Philadelphia Solar Energy Association,
POWER Interfaith, and the Union of
Concerned Scientists*

/s/ Mark Szybist

PA Attorney ID No. 94112

Senior Attorney & Advocate

Natural Resources Defense Council

1152 15th Street NW, Suite 300

Washington, DC 20005

mszybist@nrdc.org

*Counsel for Natural Resources Defense
Council*

VERIFICATION

I hereby verify that the facts contained in the foregoing document are true and accurate to the best of my knowledge, that I am duly authorized to make this verification, and that I expect to be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: August 31, 2021

/s/ Devin McDougall

PA Attorney ID No. 329855

Senior Attorney

Earthjustice

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Philadelphia, PA 19103

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(917) 628-7411

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing electronically-filed document upon the parties, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

<p>Charis Mincavage Adeolu A. Bakare Teresa Harrold Jo-Anne Thompson McNees Wallace & Nurick LLC 00 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 cmincavage@mcneeslaw.com abakare@mcneeslaw.com tharrold@mcneeslaw.com jthompson@mcneeslaw.com</p> <p><i>Counsel for PECA, MEIUG, PICA, PAIEUG, PPLICA, and WPII</i></p>	<p>Donna M. J. Clark Energy Association of Pennsylvania 800 North Third Street, Suite 205 Harrisburg, PA 17102 dclark@energypa.org</p> <p><i>Counsel for EAP</i></p>
<p>Julian Boggs Energy Storage Association 901 New York Avenue NW Suite 510 Washington, DC 20001 j.boggs@energystorage.org</p> <p><i>State Policy Director for Energy Storage Association</i></p>	<p>Deanne M. O'Dell Eckert Seamans Cherin & Mellott, LLC 213 Market Street 8th Floor Harrisburg, PA 17101 dodell@eckertseamans.com</p> <p><i>Counsel for RESA</i></p>
<p>Lindsay Baxter Duquesne Light Company 411 Seventh Avenue Pittsburgh, PA 15219 lbaxter@duqlight.com</p> <p><i>State Regulatory Strategy Manager for Duquesne Light Company</i></p>	<p>John F. Lushis, Jr Norris McLaughlin, PA 515 West Hamilton Street Suite 502 Allentown, PA 18101 jlushis@norris-law.com</p> <p><i>Counsel for Calpine</i></p>
<p>Derek Oosterman Convergent Energy + Power 7 Times Square Suite 3504 New York, NY 10036</p>	<p>Aron J. Beatty Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101</p>

<p>doosterman@convergentep.com</p> <p><i>Senior Vice President, Regulatory & Policy Affairs for Convergent</i></p>	<p>abeatty@paoca.org</p> <p><i>Counsel for OCA</i></p>
<p>Katherine Hamilton Advanced Energy Management Alliance PO Box 65491 Washington, DC 20035 info@aem-alliance.org</p> <p><i>Executive Director for Advanced Energy Management Alliance</i></p>	<p>Anthony E. Gay PECO 2301 Market Street Philadelphia, PA 19103 anthony.gay@exeloncorp.com</p> <p><i>Vice President and General Counsel for PECO</i></p>
<p>Scott Elias Solar Energy Industries Association 1425 K Street, N.W. Suite 1000 Washington, DC 20005 selias@seia.org</p> <p><i>Senior Manager of State Affairs, Mid-Atlantic for SEIA</i></p>	<p>Tori L. Giesler First Energy 2800 Pottsville Pike PO Box 16001 Reading, PA 19612 tgiesler@firstenergycorp.com</p> <p><i>Counsel for First Energy</i></p>
<p>Michael S. Swerling UGI 460 North Gulph Road King of Prussia, PA 19406 swerlingm@ugicorp.com</p> <p><i>Counsel for UGI</i></p>	<p>Jeffrey W. Mayes Monitoring Analytics, LLC 2621 Van Buren Avenue, Suite 160 Eagleville, Pennsylvania 19403 jeffrey.mayes@monitoringanalytics.com</p> <p><i>Counsel for the Independent Market Monitor for PJM</i></p>
<p>Philip D. Moeller Edison Electric Institute 701 Pennsylvania Avenue, N.W. Washington, D.C. 20004 pmoeller@eei.org</p> <p><i>Executive Vice President, Business Operations and Regulatory Affairs for Edison Electric Institute</i></p>	<p>Glen Thomas GT Power Group 101 Lindenwood Drive Suite 225 Malvern, PA 19355 gthomas@gtpowergroup.com</p> <p><i>Representative of the PJM Power Providers Group</i></p>
<p>Erin K. Fure Office of Small Business Advocate Forum Place – First Floor</p>	<p>Carrie B. Wright</p>

<p>555 Walnut Street Harrisburg, PA 17101 efure@pa.gov</p> <p><i>Counsel for OSBA</i></p>	<p>Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 carwright@pa.gov</p> <p><i>Counsel for I&E</i></p>
<p>David A. Althoff, Jr. Department of Environmental Protection 400 Market St Harrisburg, PA 17101 dalthoff@pa.gov</p> <p><i>Director, Energy Programs Office for PA DEP</i></p>	<p>Kimberly A. Klock PPL Two North Ninth Street Allentown, PA 1810 KKlock@pplweb.com</p> <p><i>Counsel for PPL</i></p>

Dated: August 31, 2021

/s/ Devin McDougall
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