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File #: 193598

February 10, 2022

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

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:

This correspondence is in relation to the executed **CONFIDENTIAL** Conservation Service Provider (“CSP”) contract between PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) and the CSP selected to provide PJM Interconnection LLC (“PJM”) Forward Capacity Market (“FCM”) bidding services under the Company’s Phase IV Energy Efficiency and Conservation (“EE&C”) Plan. Under separate cover, via the Commission’s Share Point website, the **CONFIDENTIAL** contract documents will be uploaded for your processing. The **CONFIDENTIAL** CSP contract has been amended by PPL Electric and the CSP to address the issues raised by the Pennsylvania Public Utility Commission in its review of the prior version of this contract submitted on December 30, 2021.

In addition, the filing includes **CONFIDENTIAL** copies of PPL Electric’s: (1) cover sheet summarizing the aspects of the contract as required by the Pennsylvania Public Utility Commission’s (“Commission”) *Phase IV Implementation Order*¹; (2) bid evaluation summary (including the number of bids that were received, justification for selection of CSP if based on receipt of less than three bids, and explanation for non-selection of low-bid CSP, if applicable); and (3) redline copy of the prior version of the contract submitted on December 30, 2021, which shows the changes made by PPL Electric and the CSP in redline.

¹ *Energy Efficiency and Conservation Program*, Docket No. M-2020-3015228, at 114-17 (Order entered June 18, 2020).

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The CSP contract documents are marked **CONFIDENTIAL** because they contain competitively sensitive information, including, but not limited to, details about the bids received for the services to be provided under the CSP contract as well as PPL Electric's evaluation of such bids. Therefore, PPL Electric respectfully requests that the Commission afford the CSP contract documents proprietary treatment and place them in a non-public folder.

PPL Electric solicited and evaluated bids in accordance with its "Procedure 100-101 Awarding Contracts to PA Act 129 Conservation Service Providers," which was approved via Secretarial Letter by the Commission on July 14, 2015.² The **CONFIDENTIAL** bid evaluation summary describes the bid solicitation and evaluation process.

Further, PPL Electric notes that the **CONFIDENTIAL** CSP contract will only be effective upon Commission approval.

PPL Electric respectfully requests that the Commission approve the **CONFIDENTIAL** CSP contract in an expeditious manner, so that PPL Electric and the CSP have sufficient time to prepare and implement the services under this contract.

If you have any questions regarding this matter, please do not hesitate to contact me.

Respectfully submitted,



Devin Ryan

DTR/jl

cc: Joseph Sherrick
Adam Young, Esquire
Steven K. Bainbridge, Esquire
Patrick M. Cicero, Esquire (*letter only*)
Steven C. Gray, Esquire (*letter only*)
Richard A. Kanaskie, Esquire (*letter only*)

² In its *Phase IV Implementation Order*, the Commission permitted electric distribution companies to use their Commission-approved Phase III CSP bidding procedures. *See id.* at 114. PPL Electric elected to use those procedures for Phase IV.