

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**REJOINDER TESTIMONY OF  
STEPHEN WHITLEY**

**PPL Electric Statement No. 4-RJ**

**August 26, 2020**

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Stephen Whitley, and my current business address is 513 Council Fire Drive,  
3 Chattanooga, TN 37421.

4  
5 **Q. WHAT IS YOUR CURRENT OCCUPATION?**

6 A. I am an electric industry consultant doing business as Stephen Whitley LLC. I provide  
7 consultation, testimony, and advice to various clients in the electric industry on matters  
8 including planning, operations, engineering, environmental, distributed energy resources,  
9 electricity markets, Regional Transmission Organization (“RTO”) and Independent  
10 System Operator (“ISO”) policies and procedures, and regulatory affairs.

11

12 **Q. HAVE YOU PREVIOUSLY SUBMITTED IN TESTIMONY IN THIS**  
13 **PROCEEDING?**

14 A. Yes. My direct testimony is set forth in PPL Electric Statement No. 4, and my rebuttal  
15 testimony is set forth in PPL Electric Statement No. 4-R.

16

17 **Q. WHAT IS THE PURPOSE OF YOUR REJOINDER TESTIMONY?**

18 A. I will respond to some of the allegations made in NRDC Statement No. 1-SR, the  
19 Surrebuttal Testimony of Harry Warren submitted on behalf of the Natural Resources  
20 Defense Council (“NRDC”); and OCA Statement No. 1-SR, the Surrebuttal Testimony of  
21 Ron Nelson submitted on behalf of the Office of Consumer Advocate (“OCA”). In this  
22 rejoinder testimony, I will address the witnesses’ surrebuttal testimony in that order.

23

1 **Q. ARE YOU SPONSORING ANY EXHIBITS WITH YOUR REJOINER**  
2 **TESTIMONY?**

3 A. No.

4  
5 **I. NRDC STATEMENT NO. 1-SR – SURREBUTTAL TESTIMONY OF HARRY**  
6 **WARREN**

7 **Q. DO YOU AGREE WITH NRDC WITNESS WARREN’S CLAIM THAT THE**  
8 **PROTRACTED LENGTH OF THE NEW YORK PUBLIC SERVICE**  
9 **COMMISSION’S (“NYPSC”) REFORMING ENERGY VISION (“REV”)**  
10 **PROCEEDING SHOULD BE DISREGARDED? (NRDC STATEMENT NO. 1-SR,**  
11 **PP. 20-21.)**

12 A. No. PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) needs to  
13 move forward with its Distributed Energy Resource (“DER”) Management proposal in  
14 order to provide safety to its crews and the public in its distribution operations and  
15 maintenance, to improve reliability and service quality to all of its distribution customers,  
16 and to avoid a much higher cost at a later date. Clearly, the REV proceeding initiated by  
17 the NYPSC is a prime example of how a state-wide proceeding can delay and essentially  
18 stop any progress in this effort. This fact should not be dismissed as suggested by NRDC  
19 witness Warren. Thus, I continue to strongly believe the PPL Electric DER Management  
20 proposal should be approved without undue delay.

21

1 **II. OCA STATEMENT NO. 1-SR – SURREBUTTAL TESTIMONY OF RON**  
2 **NELSON**

3 **Q. OCA WITNESS NELSON CONTENDS THAT HE DID NOT PROPOSE THAT**  
4 **PPL ELECTRIC SOLELY RELY ON THIRD-PARTY DER AGGREGATORS,**  
5 **CALLING IT A “HYPOTHETICAL SCENARIO” THAT HE DID NOT**  
6 **SUGGEST. (OCA STATEMENT NO. 1-SR, P. 14.) WOULD YOU PLEASE**  
7 **COMMENT?**

8 A. I am confounded by Mr. Nelson’s argument. He flatly opposes the Company’s proposal  
9 to monitor and manage DERs and wants the “third-party aggregation approach to be  
10 preserved.” (OCA Statement No. 1-SR, p. 14.) If PPL Electric cannot monitor and  
11 manage DERs but third-party aggregators are able to do so, then Mr. Nelson is  
12 advocating for PPL Electric to solely rely on third-party DER aggregators to utilize the  
13 smart inverters’ grid support functions. Again, I maintain that PPL Electric should be  
14 able to monitor and manage the DERs that are interconnected with its own distribution  
15 system. PPL Electric is explicitly responsible for the safety and reliability of its  
16 distribution system and providing safe and reasonable service to all of its 1.4 million  
17 customers.

18 Further, Mr. Nelson overlooks how the Company’s DER Management Plan  
19 actually **allows** for the continuation and existence of third party aggregators. Therefore,  
20 his argument that the “third-party aggregation approach be preserved” is moot.

21 In addition, the fact remains that PPL Electric has little to no information about  
22 the generation and load from DERs on its system, which, when compared to how much  
23 information PJM Interconnection LLC (“PJM”) has about the generation interconnected

1 with the transmission system, places the Company at a severe disadvantage in safely and  
2 reliably operating its distribution system both now and in the future.

3 By maintaining that PPL Electric's DER Management Petition should be denied  
4 in its entirety and not even proposing a pilot program, OCA witness Nelson clearly wants  
5 the Company to continue flying blind about the DERs interconnected with its own  
6 distribution system and have no ability to manage those DERs, rather than being able to  
7 monitor new DERs' generation and load while exercising limited management over those  
8 DERs for the benefit of all customers and the public. OCA witness Nelson's position is  
9 untenable and indefensible and should be rejected completely.

10  
11 **Q. DOES THIS CONCLUDE YOUR REJOINDER TESTIMONY AT THIS TIME?**

12 **A.** Yes, although I reserve the right to supplement my rejoinder testimony.