

March 7, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

Re: Petition of PPL Electric Utilities Corporation for Approval of Tariff Modifications and Waivers of Regulations Necessary to Implement its Distributed Energy Resources Management Plan; Docket No. P-2019-3010128: **JOINT SOLAR PARTIES' PETITION FOR RESCISSION OR MODIFICATION**

Dear Secretary Chiavetta:

On January 19, 2024, Tesla, Inc., Sun Directed, American Home Contractors, Sunrun, Inc., and the Solar Energy Industries Association (the Joint Solar Parties (or "JSPs" or "Petitioners")) filed in the above-captioned docket, a Petition for Rescission or Modification of an Order issued by the Pennsylvania Public Utility Commission ("Commission"), which Order authorized PPL Electric Utilities Corporation's ("PPL's") implementation of a Distributed Energy Resource ("DER") Management Pilot ("Pilot").

Participation in the so-called "Pilot," which is mandatory for a customer to interconnect in PPL territory, requires installation of a PPL-owned "Management Device" on the inverter of a customer-owned solar system to allow PPL to monitor and control the customer's inverter. The Pilot also requires that the customer's inverter be one PPL approved as compatible with its Management Device.

The JSPs – all of whom are or represent solar system installers -- contend that as implemented, the Pilot is causing egregious technical problems, disrupting their ability to communicate with their customers' solar systems and to interpret and/or respond to system failure alerts, and interfering with customers' systems' production of Solar Renewable Energy Credits. The JSPs further contend that the Pilot's limits on the types of inverters that can be employed has caused and exacerbated severe equipment sourcing issues, constricted the types and variety of solar systems that can be installed, and driven up the costs of and delayed solar systems installation. As a result, several installers about which the JSPs are aware have reluctantly ceased doing business altogether or significantly curtailed business in PPL territory; and numerous customers about which the JSPs are aware have decided not to "go solar."



As the 3-year Pilot, currently set to expire in March, 2025, allows no possibility for customers to opt in or out, and bars any adjustments to be made until an extended program begins (i.e., no earlier than April, 2025), the JSPs had no choice but to seek mid-course relief. Thus, they filed their petition requesting that the Commission either rescind the program, or order that it be modified so as to allow customers to opt out, and requested Expedited Review, believing it would be too harmful to their business interests, to their customers' solar interests, and to the Commonwealth's interests in furthering choice for Pennsylvania ratepayers, if the JSPs had to wait until April of 2025 before they might see a change to the program. It is important to note that the Petitioners and their customers – who have systems that were installed and are operating under the Pilot -- are continuing to experience disruptions on a daily basis as a result of participation in the Pilot.

Both PPL and the Office of Consumer Affairs filed responses to the JSPs' Petition. These contend that granting the relief sought by the JSPs would be premature, as PPL will be filing a Year 2 report in April, 2024, and in May 2024, can petition to extend the program, and can propose -- in a proceeding in which the JSPs can seek to intervene -- changes to be made to the extended program, i.e., the program that will begin no earlier than April, 2025.

As even PPL's and OCA's optimistic scenario will afford no interim relief – that is, no relief until at least April, 2025, the JSPs respectfully request that their Petition and Request for Expedited Relief be assigned for hearing and disposition before an administrative law judge without delay.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties listed below via electronic mail, in accordance with 52 Pa. Code § 154:

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Dated this 7th day of March, 2024

/s/ Bernice I. Corman