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January 13, 2015

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 Smart Meter Technology Procurement and Installation Plan; Docket No. M-2014-2430781

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Main Brief of the PP&L Industrial Customer Alliance ("PPLICA") concerning the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with copies of this document. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Adeolu A. Bakare

Counsel to the PP&L Industrial Customer Alliance

AAB/sar
Enclosure

c: Administrative Law Judge Susan D. Colwell
Certificate of Service

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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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Dated this 13th day of January, 2015, at Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of its Smart Meter Technology : Docket No. M-2014-2430781
Procurement and Installation Plan :

**MAIN BRIEF OF THE
PP&L INDUSTRIAL CUSTOMER ALLIANCE**

Air Products and Chemicals, Inc.
Armstrong World Industries, Inc.
General Dynamics-OTS Scranton
Harristown Enterprises, Inc.
Hercules Cement Company

Linde LLC
SAPA Extrusions, Inc.
The Hershey Company
TIMET North America
Wegmans Food Markets, Inc.

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Dated: January 13, 2015

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I. INTRODUCTION AND PROCEDURAL HISTORY

On August 14, 2009, consistent with the requirements of Act 129 of 2008 ("Act 129") and the Pennsylvania Public Utility Commission's ("Commission" or "PUC") Smart Meter Implementation Order ("Implementation Order") entered on June 24, 2009, at Docket No. M-2009-2092655, PPL Electric Utilities Corporation ("PPL" or "Company") filed its initial Smart Meter Technology Procurement and Installation Plan ("Initial SMPI Plan") with the Commission. On June 24, 2010, the Commission entered an Opinion and Order, which found, *inter alia*, that PPL's existing metering system did not provide customers with direct access to customer usage data. As a result, the Commission directed PPL to provide metered usage data from the meter to customers to support the automatic control of electricity consumption, and directed PPL to revise the Initial SMPI to fully comply with Act 129. On August 2, 2012, the Commission directed PPL to file a revised Plan by June 30, 2014.

On June 30, 2014, PPL petitioned the Commission for approval of its second Smart Meter Technology Procurement and Installation Plan ("SMPI Plan" or "Petition"). Through the SMPI Plan, PPL proposes to begin implementing backbone Radio Frequency ("RF") Mesh Advanced Meter Infrastructure ("AMI") in 2015 and deploy RF Mesh smart meters between 2017 to 2019. PPL estimates its total costs to be approximately \$449.3 million, and proposes to recover these costs through the Smart Meter Rider ("SMR") as a per-customer charge for all Residential, Small Commercial and Industrial ("C&I") and Large C&I customers.

On August 8, 2014, the PP&L Industrial Customer Alliance ("PPLICA")¹ filed a Petition to Intervene and Protest to the Company's Petition. A Prehearing Conference was held on August 11, 2014, before Administrative Law Judge ("ALJ") Susan D. Colwell.

¹ PPLICA's compilation is listed on the cover page of this Main Brief.

PPLICA received the Company's Direct Testimony with the SMPI Plan on June 30, 2014. Pursuant to the procedural schedule, on October 10, 2014, PPLICA received Direct Testimony from the following parties: the Office of Consumer Advocate ("OCA") and the Office of Small Business Advocate ("OSBA"). On November 21, 2014, PPLICA received Rebuttal Testimony from the Company. On December 5, 2014, PPLICA received Surrebuttal Testimony from the OCA and OSBA.

An evidentiary hearing was held in this proceeding on December 16, 2014, for the purposes of presenting testimony and performing cross-examination. During this hearing, the parties confirmed the process for submitting Briefs. Pursuant to the procedural schedule, PPLICA submits this limited Main Brief to address certain issues raised in this proceeding.

Specifically, PPLICA's Main Brief will address PPLICA's concerns with the privacy of customer data available to Electric Generation Suppliers ("EGS") and authorized 3rd parties through PPL's Supplier Portal. PPLICA will also address concerns regarding the appropriate treatment of any reductions to PPL's Unaccounted for Energy ("UFE") rate resulting from implementation of PPL's SMPI Plan.

A. Summary of Briefing Party's Position

PPLICA's does not take a position of support or opposition of PPL's SMPI, but rather requests that any approval of the SMPI should be conditioned on further refinements to two components of PPL's Plan. Specifically, PPLICA proposes necessary clarifications for implementation of PPL's Supplier Portal and appropriate ratemaking adjustments to account for potential improvements to PPL's UFE rate attributable to implementation of the SMPI Plan.

PPL's SMPI includes a Supplier Portal designed to create a secure data environment through which EGSs and other 3rd parties can automatically access customers' usage data without resorting to the traditional request and response process associated with Electronic Data

Interchange ("EDI") systems. Although PPL has implemented additional customer protections since introducing the Supplier Portal as a pilot program within its initial Smart Meter Technology Procurement and Installation Plan ("Initial SMPI Plan"), PPLICA remains concerned that the Supplier Portal raises important customer privacy considerations.² For example, while PPL has confirmed that the Supplier Portal will maintain an event log documenting requests for customer usage data for at least 3 years, PPL has also indicated that certain situations may prevent the Company from accommodating a customer's request for event log data. To ensure that PPL's Supplier Portal provides customers with a clear and transparent opportunity to protect their usage data, PPLICA recommends that the Commission direct PPL to develop and file specific guidelines outlining the factors to be considered in responding to a customer request for event log data. Absent a compelling reason, all reasonable requests should be fulfilled. Additionally, PPLICA recommends that the Commission consider the necessity to refine its customer privacy regulations as PPL and other Electric Distribution Companies ("EDCs") install more automated data storage and communications technologies.

Second, PPL's testimony indicates that the implementation of RF Mesh technology may decrease the incidence of UFE on the Company's transmission and distribution systems. While lower UFE rates are generally beneficial for customers, it remains unclear as to whether PPL has appropriately considered the relationship between UFE and the transmission and distribution line loss factors used to gross-up EGS deliveries pursuant to PPL's Tariff Electric Pa. P.U.C. No. 1s (hereinafter "Electric Supplier Generation Coordination Tariff" or "Supplier Tariff"). While PPL contends that line loss factors used to gross-up EGS deliveries exclude UFE, the Supplier Tariff

² PPL introduced the Supplier Portal as a limited pilot program in 2012. *See Petition of PPL Electric Utilities Corporation for Approval to Modify its Smart Meter Technology Procurement and Installation Plan and to Extend its Grace Period*, Docket No. M-2009-2123945 (August 1, 2012).

remains ambiguous as to the calculation of system losses. The Company's SMPI should be modified to require PPL to submit a compliance filing itemizing the components of the line loss factors set forth in the Supplier Tariff and, as appropriate, agreeing to revise the line loss factors to reflect changes to its UFE rate attributable to the implementation of the SMPI Plan.

II. ARGUMENT

A. Privacy of Customer Data Available Through Supplier Portal

As indicated above, PPL's SMPI includes a proposal to implement a Supplier Portal for purposes of facilitating EGS and 3rd party access to customer usage data. According to PPL, the Supplier Portal was developed to be consistent with the Commission's existing privacy requirements for EGSs and 3rd parties. Unfortunately, the practical consequences of expanding these policies to a fully automated electronic database indicate that the Commission's policies inadequately protect customers' usage data. To maximize customer protections available through PPL's Supplier Portal within the framework of the Commission's existing privacy policies, PPLICA has worked with PPL to implement recordkeeping policies allowing for monitoring and investigation of unauthorized use of the platform. As discussed below, PPLICA also requests that the Commission direct PPL to adopt specific protocols for evaluating customer requests for event log data. Notwithstanding such improvements to PPL's Supplier Portal, PPLICA remains concerned that customer usage data will remain at risk absent additional Commission action to refine current policies placing the burden of monitoring access to customer usage data on the customer.

PPL designed the Supplier Portal to increase the efficiency of data access while preserving the framework of the Commission's existing customer privacy policies. PPL Exhibit No. 1, Appendix C, p. 19. As described by PPL, the purpose of the Supplier Portal is to "create a secure data environment wherein EGSs, and potentially other 3rd parties, can, with appropriate

customer authorization, access customers' usage data directly without need for an EDI request and response." *See id.* Through responses to PPLICA's discovery questions, PPL further clarified that the phrase "secure data environment" refers to the technical cybersecurity measures taken to protect data stored in the Supplier Portal. *See PPLICA Cross-Examination Exhibit No. 1, p. 1.* PPL similarly clarified that the phrase "appropriate customer authorization" refers to the standards EGSs or 3rd parties must meet to gain access to customers' usage information through the Supplier Portal. *See id.* Importantly, PPL does not propose to develop new standards, but avers that "the conditions for appropriate customer authorization are determined in the Commissions [*sic*] requirements for licensed EGS's and 3rd parties." *See id.*

The Commission's current policies provide that "all Electric Distribution Company (EDC) customers shall have the right to withhold all customer account and usage data from the Eligible Customer List that is made available to Commission-licensed Electric Generation Suppliers (EGSs)." *Interim Guidelines For Eligible Customer Lists, Final Order On Reconsideration, Docket No. M-2010-2183412 (Nov. 15, 2011), p. 25 (hereinafter "ECL Order") (Emphasis added).* To that end, the Commission requires EDCs to publish an Eligible Customer List ("ECL") but allows customers to opt-out of making customer usage data available to EGSs and 3rd parties through the ECL. *See id.*

Unfortunately, the Commission's current policies rely on an honor system where EDCs are not required to affirmatively review requests for customer data to confirm whether the subject customer has opted out of the ECL. *See Electric Generation Supplier Access to Restricted Customer Accounts, Docket No. M-2009-2082042, Secretarial Letter issued August 20, 2010 (hereinafter "EGS Access Letter").* The EGS bears all responsibility for obtaining customer authorization to access usage data and declining to request information for

customer accounts that are omitted from the ECL. *See id.* However, to the extent an EGS possesses customer account information, regardless of the manner of obtaining such information, PPL has no duty to confirm whether the customer opted out of the ECL. *See PPLICA Cross-Examination Exhibit No. 2, p. 1.* As confirmed by a discovery response from PPL:

The information available to authorized users is not tied to the eligible customer list. It is the obligation of the EGS and 3rd party to ensure they have proper authorization to view customer data.

See id. Particularly as applied to efficient technologies with automated responses, this policy creates a precarious situation for customers interested in protecting their usage data.

PPL may have intended to preserve the policies previously developed by the Commission to protect customer data transmitted through EDI, but the application of the Commission's existing policies to more technically efficient platforms may increase the circulation of customer usage data despite the customer's best efforts to withhold access. Although the Commission's current customer privacy policies do not require PPL to confirm an EGS's authority to access customer data, the technical limitations of EDI technology require PPL to affirmatively participate in the transaction by responding to each EGS request for customer usage data. *See PPL Exhibit No. 1, Appendix C, p. 19.* To the contrary, the Supplier Portal automates the process by allowing EGSs, and potentially 3rd parties, to directly access customers' usage data without need for an affirmative response from PPL. *See id.* Access to the Supplier Portal will be granted to any individual sending an email request from an EGS's email domain and providing the EGS's Licensed PA Energy Provider license information in the email. *See PPLICA Cross-Examination Exhibit No. 1, p. 4.* Once granted access, the user may obtain usage data for any PPL customer by inputting the customer's PPL account number into the Supplier Portal. *See id.* at 3. It does not take much imagination to conjure hypothetical scenarios where an EGS would

have access to customer account information but lack authority to access customer data. For example, unless a customer changes its PPL account number when switching EGSs, all of its former suppliers would be able to access the customer's current usage data, even if the customer subsequently opts out of the ECL.

Because the usage data available through the Supplier Portal includes sensitive customer information, PPLICA is concerned that the more passive automated access afforded through the Supplier Portal raises the likelihood of unauthorized disclosures of protected customer information. As illustrated below, the Supplier Portal affords access to comprehensive customer usage data:

After appropriate authorization is granted for supplier portal access, the EGS or 3rd party representative may review and export to excel two years of summary monthly billing data, as well as one year of interval data at the account and meter level. Two months of paper bill images or six months of electronic bill images are only available to EGS's for the periods in which they were the customer's energy supplier. Also available to EGS's on the supplier portal is a list of customers currently enrolled with the specific EGS.

Additional data available on the supplier portal: eligible customer list, capacity and transmission tags, load profile data, customer rate class, account status, account activation date, net meter indicator, area light indicator, summary billing indicator, and customer bill cycle. This data is consistent with the data provided through EDI.

PPLICA Cross-Examination Exhibit No. 1, p. 2. Although similar to the information provided through EDI, the Supplier Portal increases the ease of access to such information. *See* PPL Exhibit No. 1, Appendix C, p. 19 (identifying increases efficiency as a benefit of the Supplier Portal). While the improved efficiency would benefit the activities of authorized EGSs and 3rd parties, it would also benefit the activities of less scrupulous EGSs and 3rd parties seeking unauthorized access to customer usage data.

The potential for abuse of the Supplier Portal necessitates a system for holding users accountable, which PPL has partially addressed by agreeing to maintain event logs of activity through the Supplier Portal. Consistent with informal discussions conducted within the context of PPL's Smart Meter stakeholder process, PPL has incorporated the following automatic recordkeeping capabilities into the Supplier Portal:

An Event Log is maintained and tracks access to customer information based on individual unique user names. Every time a user submits a request for any data available on the portal the request is logged with the unique user name, supplier name, date/time stamp, and customer account number and recorded as successful or unsuccessful attempts.

See PPLICA Cross-Examination Exhibit No. 1, p. 5. PPL has further confirmed that the event log data will remain accessible for three years. *See id.* at 7-8. Additionally, PPL has indicated that it will furnish event log data upon request of either PUC staff or customer representatives. *See id.* at 8. Unfortunately, PPL's responses to discovery questions also indicated that requests for customer event log data will be reviewed on a case-by-case basis. *See id.* at 8. While PPL later clarified that its ability to respond to customer requests for event log data would likely be constrained only by the timeframe of a customer's request, the fact remains that an *ad hoc* process for addressing such requests is insufficient. *See Tr.* 59-60. To more adequately provide customers with a resource to monitor data requests through the Supplier Portal, PPL must be directed to develop specific protocols setting forth the limitations on its ability to respond to customer requests for event logs. Absent compelling reasons, requests should be fulfilled without undue delay.

Moreover, while the availability of event log data provides both the PUC and customers with a degree of oversight over the operation of PPL's Supplier Portal, additional action is required to fulfill the policy goals set forth in the Commission's ECL Order. As stated above, the

ECL Order granted all customers the right to withhold usage data from the ECL made available to EGSs. *See* ECL Order, p. 25. As EDCs transition from EDI towards more efficient automated databases, the Commission should consider whether more affirmative restrictions on EGS or 3rd party access to customer access should be implemented to minimize the potential for unauthorized disclosures of customer usage data. While PPL's recordkeeping policies, as modified by PPLICA's recommendation to add specific protocols outlining the evaluation process for customer event log requests, would impose some accountability upon EGSs and 3rd parties using the Supplier Portal, the burden for policing unauthorized access remain primarily with the customer. This passive enforcement structure severely erodes the security and protection afforded to customers choosing to opt-out of the ECL. Further Commission action to investigate and update the Commission's customer privacy policies is necessary to provide appropriate protection for customers wishing to withhold usage information from dissemination to unauthorized EGSs or 3rd parties.

B. Unaccounted For Energy and Line Loss Factors

The alleged benefits of the SMPI Plan identified by PPL in this proceeding include an expectation for improved UFE rates. Through discovery, PPLICA raised questions regarding the necessity to update line loss factors published in PPL's Supplier Tariff and applied to gross-up EGS deliveries to account for line losses on the transmission and distribution system. *See* PPLICA Cross-Examination Exhibit No. 3, pp. 1-2. Although PPL has indicated that the line loss factors exclude UFE, the Supplier Tariff contains no such limitation. To ensure that the line loss factors continue to reflect the actual losses occurring on PPL's distribution system, PPL should be directed to publish the calculation of its line loss factors in a Compliance Filing and, to the extent appropriate based on the published calculation, adjust its line loss factors to reflect any changes to its UFE rates following implementation of the SMPI Plan.

Although PPL cannot quantify the effect of its SMPI on UFE rates, it anticipates that UFE rates will decline for two principal reasons. First, PPL anticipates that field technicians installing the meters will naturally discover and address situations contributing to UFE at specific meter sites. *See* PPLICA Cross-Examination Exhibit No. 3, p. 2. Second, PPL will use the advanced RF Mesh technology to better monitor usage anomalies associated with UFE. *See id.* PPL provided the following detailed account of these expectations:

PPL Electric is unable to reasonably quantify the projected impacts of improved tracking of unaccounted-for energy at this time. Currently, the Company uses analytics to detect unaccounted-for energy by using reverse rotation flags from the meter and finding anomalies in metered usage. Accounts are investigated based on the results from the analytics. Unaccounted-for energy can be attributed to consumption on active accounts, theft of service, and meter malfunctions.

The Company anticipates that during deployment additional cases of unaccounted-for energy will be discovered as every meter is changed to a new RF mesh meter. Cases of tampering and other field anomalies will be documented as part of the deployment process. The new meter will also be physically different to minimize known methods in which customers tamper with existing meters. Once the new meters are deployed they will have additional alarms such as magnetic field detection, cover removed signals, and power outage and restoration messages that can be used in conjunction with other data such as usage anomalies and known outages to determine if meters are being tampered with. Advanced analytics will need to be developed to correlate these different types of events and actively monitored to prevent a build-up of unaccounted-for energy. Additionally, the Company in the future will be able to remotely block every account where a customer informs us they are moving out or otherwise vacating the property. This will improve operating efficiency by eliminating the need to send a field resource and minimize future occurrences of consumption on inactive accounts.

See id.; *see also* PPL Stmt. No. 2, p. 18; *see also* Tr. 64. While PPLICA supports the Company's plans to minimize future occurrences of UFE, the Company should also conduct further investigation to address lingering questions regarding the relationship between UFE and the line loss factors calculated pursuant to Section 6.8 of PPL's Supplier Tariff.

The record in this proceeding reflects uncertainty regarding the necessity for PPL to update the line loss factors published in its Supplier Tariff to reflect anticipated reductions to the Company's UFE rates. PPL's Supplier Tariff establishes line loss factors and directs EGSs to gross-up power deliveries by the applicable customer class line loss factor for forecasting, scheduling, and reconciliation purposes. *See* Supplier Tariff, Section 6.8. According to the Supplier Tariff, the line loss factors reflect the "combined transmission and distribution losses" for secondary voltage, primary voltage, and transmission voltage customers. *See id.* Prior to the evidentiary hearings, PPLICA propounded discovery on PPL requesting information on the Company's plans for updating various tariff provisions, including the Supplier Tariff, to reflect changes to its UFE rate. *See* PPLICA Cross-Examination Exhibit No. 3, p. 1. In response, PPL explained that "[t]o the extent unaccounted-for-energy is reduced; it is inherently incorporated in sales used for distribution rates in base rate proceedings and riders when the rates are recalculated." *See id.* at 2. PPL did not address any impact of reduced UFE upon the Supplier Tariff in the discovery response. *See id.*

To clarify the impact of reduced UFE on the line loss factors published in the Supplier Tariff, PPLICA revisited the issue at the evidentiary hearing. Here, PPL Witness Bethany Johnson, with the caveat the matter involved engineering issues beyond her expertise, provided the following responses:

- Q. Would – has the company determined whether those loss-factored numbers would need to be updated or revised in relation to any improvements in unaccounted-for energy resulting from the Smart Meter Plan Implementation?
- A. As I mentioned earlier, the losses that are referred to here are really system losses, which are different from unaccounted-for energy.
- Q. Could you describe what you mean by "system losses"?

A. So, as I mentioned previously, as I said, this is certainly getting outside my experience, but the system losses are really related to things such as heat loss on the lines or trans – losses due to transformation of the energy, that type of thing.

[Additional question omitted].

Q. So, it is your testimony that you do not expect the Smart Meter implementation plan and the implementation of the RF Mesh technology to affect the system losses?

A. That's correct. The system line losses that are related to engineering and other – you know, the engineering and the design of the – of the infrastructure of the system.

Tr. 136-137. Ms. Johnson further opined that system losses are those occurring before the customer's end use meter while UFE measures losses occurring behind the customer's meter as a result of theft or tampering. *See* Tr. 138. However, because the term "system losses" is undefined in the Supplier Tariff, it remains unclear as to whether UFE losses are embedded within the line loss factors. *See* Supplier Tariff, Definitions.

Although disputing the necessity to modify PPL's line loss factors, Ms. Johnson agreed in principle that PPL would have an obligation to adjust the line loss factors if the current line loss calculation included UFE losses. Tr. 138. Accordingly, PPLICA recommends that the Commission direct PPL to furnish a calculation of the line loss factors itemizing the various loss components as a Compliance filing. This additional condition would affirm that PPL's line loss factors continue to reflect current conditions in the event that the SMPI Plan successfully reduces the Company's UFE rates.

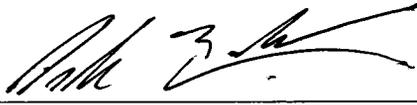
CONCLUSION

WHEREFORE, the PP&L Industrial Customer Alliance respectfully requests that the Pennsylvania Public Utility Commission:

- (1) Direct PPL to develop specific protocols identifying the factors to be considered in responding to customers' request for event log data from the Supplier Portal;
- (2) Consider the necessity to adopt revised customer privacy policies or regulations as necessary to address the practical effects of new technology on 3rd party access to customer usage data;
- (3) Direct PPL to publish the calculation of its line loss factor set forth in Section 6.8 of its Electric Generation Supplier Coordination Tariff; and
- (4) Grant any additional relief deemed appropriate and consistent with the above recommendations.

Respectfully submitted,

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