



COMMONWEALTH OF PENNSYLVANIA

April 19, 2024

E-FILED

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

Re: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2025 Through May 31, 2029 / Docket No. P-2024-3047290

Dear Secretary Chiavetta:

Enclosed please find the Notice of Intervention, Public Statement, and Verification on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

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

Sincerely,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Enclosures

cc: Mark Ewen
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities : **Docket No. P-2024-3047290**
Corporation for Approval of a Default :
Service Program and Procurement :
Plan for the Period June 1, 2025 :
Through May 31, 2029 :

**NOTICE OF INTERVENTION
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the above-captioned Application of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2025, through May 31, 2029, that was filed with the Pennsylvania Public Utility Commission (“Commission”) on March 12, 2024. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

Rebecca Lyttle
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, Pennsylvania 17101
(717) 783-2525/(717) 783-2831 (fax)
relyttle@pa.gov

Respectfully Submitted,

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney I.D. No. 201399

Sharon E. Webb
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, Pennsylvania 17101
(717) 783-2525/(717) 783-2831 (fax)
swebb@pa.gov

Respectfully Submitted,

/s/ Sharon E. Webb
Sharon E. Webb
Assistant Small Business Advocate
Attorney ID No. 73995

For:
NazAarah Sabree
Small Business Advocate

Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, Pennsylvania 17101

Date: April 19, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities : **Docket No. P-2024-3047290**
Corporation for Approval of a Default :
Service Program and Procurement :
Plan for the Period June 1, 2025 :
Through May 31, 2029 :

**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court. This Public Statement relates to the filing today by the Small Business Advocate of a Notice of Intervention in the above-captioned Commission proceeding.

On March 12, 2024, PPL Electric Utilities Corporation (“PPL”) filed its Petition, and requests that the Commission enter an Order approving its proposed default service procurement plan for the period of June 1, 2025, through May 31, 2029.

The Small Business Advocate is intervening in the above-captioned proceeding to protect the interests of the Company’s small business customers. A thorough inquiry by the Commission into all the elements of the Petition is necessary to ascertain whether PPL’s

proposals are in accord with the Public Utility Code and with the Commission's Regulations regarding default service.


In view of the foregoing, the Small Business Advocate is requesting that the Petition be subject to investigation and evidentiary hearings before the Commission. The Small Business Advocate will ask the Commission to deny or modify any aspect of the proposals that are not proven by PPL to be in accord with the Public Utility Code and with the Commission's regulations and policy statement regarding default service.

Dated: April 19, 2024

VERIFICATION

I, NazAarah Sabree, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: April 19, 2024



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities : **Docket No. P-2024-3047290**
Corporation For Approval of a Default :
Service Program And Procurement :
Plan for the Period June 1, 2025 :
Through May 31, 2029 :

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable F. Joseph Brady
Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
fbrady@pa.gov

Christy M. Appleby, Esquire
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
OCAPPLDSP2024@paoca.org

Allison Kaster, Esquire
Director
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
akaster@pa.gov

Adeolu A. Bakare, Esquire
Harrison Ryan Block, Esquire
McNees, Wallace & Nurick
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108-1166
abakare@mcneeslaw.com
rblock@mcneeslaw.com

Kimberly A. Klock, Esquire
Michael J. Shafer, Esquire
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
kklock@pplweb.com
mjshafer@pplweb.com

Elizabeth R. Marx, Esquire
John W. Sweet, Esquire
Ria Pereira, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
emarxpulp@palegalaid.net

Todd S. Stewart, Esquire
Hawke McKeon & Sniscak LLP
100 N. 10th Street
Harrisburg, PA 17101
tsstewart@hmslegal.com

Deanne M. O'Dell, Esquire
Kristine E. Marsilio, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th floor
Harrisburg, PA 17101
dodell@eckertseamans.com
kmarsilio@eckertseamans.com

John Costlow, Esquire
4250 Independence Drive, Suite 100
Schnecksville, PA 18078
jcostlow@thesef.org

John F. Lushis, Jr., Esquire
Norris McLaughlin, P.A.
515 W Hamilton Street, Suite 502
Allentown, PA 18101
jlushis@norris-law.com

DATE: April 19, 2024

David B. MacGregor, Esquire
Michael W. Hassell, Esquire
Megan Rulli, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
dmacgregor@postschell.com
mhassell@postschell.com
mrulli@postschell.com

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney I.D. No. 201399