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July 10, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**RE: Petition of PPL Electric Utilities Corporation for a Waiver of the Distribution System
Improvement Charge Cap of 5% of Billed Revenues; Docket No. P-2024-3048732**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of the PP&L Industrial Customer Alliance ("PPLICA"), in the above-referenced proceeding.

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

Very truly yours,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', written over a horizontal line.

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

Counsel to the PP&L Industrial Customer Alliance

Attachment

c: Administrative Law Judge Arlene Ashton (via e-mail)
Certificate of Service

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).

VIA E-MAIL

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Adeolu A. Bakare

Counsel to the PP&L Industrial Customer Alliance

Dated this 10th day of July, 2024, at Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities	:	
Corporation for Waiver of the	:	
Distribution System Improvement	:	Docket No. P-2024-3048732
Charge Cap of 5% of Billed Revenues	:	

**PETITION TO INTERVENE
OF THE PP&L INDUSTRIAL CUSTOMER ALLIANCE**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71 - 5.74, the PP&L Industrial Customer Alliance ("PPLICA") hereby files this Petition to Intervene in response to the above-captioned filing of PPL Electric Utilities Corporation, Inc. ("PPL" or "Company").

On April 26, 2024, PPL Electric filed a Petition requesting that the Pennsylvania Public Utility Commission ("Commission") waive the Company's Distribution System Improvement Charge ("DSIC") cap of 5% of billed revenues and increase the maximum allowable DSIC to 9% for bills rendered on or after January 1, 2025.

In support of its Petition to Intervene, PPLICA asserts the following:

I. PETITION TO INTERVENE

1. PPLICA is an ad hoc group of energy-intensive large commercial and industrial ("Large C&I") customers receiving electric service from PPL primarily under Rate Schedules LP-4 and LP-5, as well as available riders. PPLICA members annually consume approximately 1.03 billion kWh of electricity in their manufacturing and operational processes, and electricity costs comprise a significant element of their respective costs of operation.

2. The PUC's disposition of PPL's Petition in this instance may impact the rates PPLICA members pay for electric service, specifically as it relates to the proposed cost recovery for expenses incurred under PPL's DSIC.

3. The names and address of PPLICA's attorneys are:

Adeolu A. Bakare (Pa. I.D. No. 208541)
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4. For purposes of this proceeding, PPLICA includes the companies listed in Appendix A hereto. PPLICA will update Appendix A during the course of this proceeding as needed to reflect changes in its membership.

5. According to 52 Pa. Code Section 5.74(a), a Petition to Intervene may be filed after the established date if good cause is shown. In this instance, PPLICA did not initially intervene this proceeding prior to the July 8 deadline. However, PPLICA understands that this proceeding is already underway, and PPLICA accepts the procedural schedule as is. In other words, PPLICA is not requesting any modifications or accommodations to the procedural schedule to account for PPLICA's late filed intervention. As such, no party should be unfairly prejudiced or assume any additional burden as a result of the Commission's granting of this Petition, particularly at this early stage of the proceeding before the July 18 deadline for Other Party Direct Testimony and the July 30 Settlement Conference. Further, consistent with 52 Pa. Code § 5.72(a), PPLICA has a significant interest in this proceeding that is not represented by any other party of record. See 52

Pa. Code § 5.72(a). Accordingly, the Commission should grant PPLICA intervenor status in this proceeding.

6. For these reasons, PPLICA posits that good cause has been shown, as required under 52 Pa. Code Section 5.74(a), and the Commission should grant this Late-Filed Petition to Intervene.

WHEREFORE, for the reasons stated above, the PP&L Industrial Customer Alliance respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene and provide the PP&L Industrial Customer Alliance with full-party status in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Counsel to the PP&L Industrial Customer Alliance

Dated: July 10, 2024

APPENDIX A

PP&L INDUSTRIAL CUSTOMER ALLIANCE

Air Products and Chemicals, Inc.
Benton Foundry
Hercules Cement Company
Hydro Extrusions, Inc.
Messer LLC
TIMET North America
Wegmans Food Markets, Inc.

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)
) ss:
COUNTY OF DAUPHIN)

ADEOLU A. BAKARE, being duly sworn according to law, deposes and says that he is Counsel to the PP&L Industrial Customer Alliance, and that in this capacity he is authorized to and does make this affidavit for them, and that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of his knowledge, information, and belief.



Adeolu A. Bakare

July 10, 2024