



COMMONWEALTH OF PENNSYLVANIA

October 9, 2025

**E-FILED**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation  
/ Docket No. R-2025-3057164**

Dear Secretary Homsher:

Enclosed please find the Complaint, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced 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/ Steven C. Gray*

Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

*Enclosures*

cc: Kevin Higgins  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|   |   |                                  |
|---|---|----------------------------------|
| <b>Pennsylvania Public Utility Commission</b> | : |                                  |
|   | : | <b>Docket No. R-2025-3057164</b> |
| v.  | : |                                  |
|   | : |                                  |
| <b>PPL Electric Utilities Corporation</b>     | : |                                  |

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**COMPLAINT OF THE  
OFFICE OF SMALL BUSINESS ADVOCATE**

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1. The Complainant is:

NazAarah Sabree  
Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101

2. The names and addresses of the Complainant’s attorneys are:

Steven C. Gray, Esq.  
Senior Attorney  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)

Rebecca Lyttle, Esq.  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

3. The respondent utility is:

PPL Electric  
2 North Ninth Street  
Allentown, PA 18101

4. The Complainant is authorized and directed by the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50, to represent the interests of small business consumers of utility services in matters before the Pennsylvania Public Utility Commission (“Commission”).

5. On September 30, 2025, pursuant to Section 1308(8) of the Public Utility Code, 66 Pa. C.S. Section 1308(d), PPL Electric Utilities Corporation (“PPL” or the “Company”) filed Original Tariff Electric – Pa. P.U.C. No. 202 (“Tariff No. 202”) with the Commission.

6. PPL’s Tariff No. 202 proposes to increase the Company’s annual distribution revenue by approximately \$356 million, or approximately 33.42%.

7. After preliminary review of the materials filed by the Company in support of Tariff No. 202, Complainant believes, and therefore avers, that those materials may be insufficient to justify the rate increase requested and that PPL’s present and proposed rates, rules, and conditions of service may be unjust, unreasonable, unduly discriminatory, and otherwise contrary to law, particularly as they pertain to the Company’s small business customers.

8. Complainant believes, and therefore avers, that PPL’s proposed tariff changes, proposed rates, rate design, and revenue allocation are or may be unjust, unreasonable, and unlawfully discriminatory in violation of, *inter alia*, Sections 1301 and 1304 of the Public Utility Code, 66 Pa. C.S. §§1301 and 1304, and, furthermore, are contrary to appropriate public policy, sound ratemaking considerations, and may not be supported by the materials filed by PPL.

9. The OSBA also files this Complaint to make certain that PPL will provide a formal payment assistance plan for its small business customers.

10. In view of the foregoing, the Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

A. Suspend and investigate the operation of Tariff No. 202;

- B. At the conclusion of such investigation, reject any proposed new rates and other tariff changes in Tariff No. 202 to the extent required to make certain that PPL's rates are lawful, just, reasonable, and not unduly discriminatory to small business customers; and
- C. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

*/s/ Steven C. Gray*

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Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

For:  
NazAarah Sabree  
Small Business Advocate

Commonwealth of Pennsylvania  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101

Dated: October 9, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|   |   |                                  |
|---|---|----------------------------------|
| <b>Pennsylvania Public Utility Commission</b> | : |                                  |
|   | : | <b>Docket No. R-2025-3057164</b> |
| <b>v.</b>                                     | : |                                  |
|   | : |                                  |
| <b>PPL Electric Utilities Corporation</b>     | : |                                  |

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

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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 (“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 (“Commission”) or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a complaint against the proposed base rates tariff filing of PPL Electric Utilities Corporation (“PPL” or the “Company”), which would increase the annual distribution revenue of PPL by approximately \$356 million, or approximately 33.42%.

The Small Business Advocate files this formal complaint against PPL’s proposed base rates tariff filing to protect the interests of the Company’s small business customers. A thorough inquiry by the Commission into all elements of PPL’s tariff filing is necessary to ensure that the proposed changes set forth in the tariff filing are lawful, just, reasonable, and not discriminatory against the Company’s small business customers.

In view of the foregoing, the Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the proposed tariff filing. The Small Business Advocate will ask the Commission to deny any proposed new rates and other tariff changes that apply to small business customers that are not proven by PPL to be lawful, just, reasonable, and not discriminatory against the Company's small business customers.

Dated: October 9, 2025

**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: October 9, 2025

  
\_\_\_\_\_  
(Signature)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|   |   |                                  |
|---|---|----------------------------------|
| <b>Pennsylvania Public Utility Commission</b> | : |                                  |
|   | : | <b>Docket No. R-2025-3057164</b> |
| <b>v.</b>                                     | : |                                  |
|   | : |                                  |
| <b>PPL Electric Utilities Corporation</b>     | : |                                  |

**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 Charles E. Rainey, Jr.  
Chief Administrative Law Judge  
Pennsylvania Public Utility Commission  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[crainey@pa.gov](mailto:crainey@pa.gov)

David B. MacGregor, Esquire  
Garrett P. Lent, Esquire  
Post & Schell, P.C.  
17 North Second Street 12th Floor  
Harrisburg, PA 17101-1601  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)

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

Kimberly A. Klock, Esquire  
Michael J. Shafer, Esquire  
PPL Services Corporation  
645 Hamilton Street, Suite 700  
Allentown, PA 18104  
[kklock@pplweb.com](mailto:kklock@pplweb.com)  
[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)

Darryl Lawrence, Esquire  
Consumer Advocate  
PA Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101-1923  
[ra-oca@paoca.org](mailto:ra-oca@paoca.org)

Devin T. Ryan, Esquire  
Alice A. Wade, Esquire  
Hayley E. Wilburn, Esquire  
Post & Schell, P.C.  
One Oxford Centre  
301 Grant Street, Suite 3010  
Pittsburgh, PA 15219  
[dryan@postschell.com](mailto:dryan@postschell.com)  
[alice.wade@postschell.com](mailto:alice.wade@postschell.com)  
[hwilburn@postschell.com](mailto:hwilburn@postschell.com)

Joseph L. Vullo, Esquire  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)

Ria M. Pereira, Esquire  
Elizabeth R. Marx, Esquire  
John W. Sweet, Esquire  
Lauren N. Berman, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@putilitylawproject.org](mailto:pulp@putilitylawproject.org)

Date: October 9, 2025

/s/ Steven C. Gray  
Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney I.D. No. 77538