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October 16, 2025

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

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

Dear Secretary Homsher:

Enclosed for electronic filing please find Aspen Power, 38 Degrees, CVE North America, Syncarpha Capital, LLC, Twilight Renewables, Bollinger Solar, and CEP Renewables, LLC, collectively as the Customer-Generator Coalition ("CGC" or "Coalition") Petition to Intervene in the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Garcia', written over a horizontal line.

Daniel Garcia, Of Counsel
STEP TOE & JOHNSON PLLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission)	
)	
)	
v.)	Docket No. R-2025-3057164
)	
PPL Electric Utilities Corporation)	
)	

**PETITION TO INTERVENE OF
ASPEN POWER, 38 DEGREES, CVE NORTH AMERICA, SYNCARPHA CAPITAL, LLC,
TWILIGHT RENEWABLES, BOLLINGER SOLAR, AND CEP RENEWABLES**

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, Aspen Power, 38 Degrees, CVE North America, Syncarpha Capital, LLC, Twilight Renewables, Bollinger Solar, and CEP Renewables, LLC, collectively as the Customer-Generator Coalition (“CGC” or “Coalition”), hereby file this petition to intervene in the above-captioned proceeding filed by PPL Electric Utilities Corporation (“PPL” or “Company”). In support of this Petition to Intervene, the CGC states as follows:

I. BACKGROUND

1. On October 3, 2025, PPL filed Original Tariff Electric – Pa. P.U.C. No. 202 (“Tariff No. 202”) seeking a general rate increase pursuant to 66 Pa. C.S. § 1308(d) of the Public Utility Code and Original Tariff Electric – Pa. P.U.C. No. 2S (“Tariff No. 2S”), which is the Company’s proposed Electric Generation Supplier Coordination Tariff and sets forth the Company’s rules, regulations, charges, and riders for its provision of coordination services to electric generation suppliers (“EGSs”).

II. PROPOSED INTERVENOR

3. CGC is an *ad hoc* group of various customer-generators engaged in the development, ownership, and operation of solar photovoltaic power generation throughout the Commonwealth, including within PPL's service territory.

4. The attorneys for Customer-Generators Coalition in this matter are:

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Counsel consents to electronic service pursuant to 52 Pa. Code § 1.54(b)(3).

III. CGC MEETS THE STANDARDS FOR INTERVENTION

5. CGC meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). As CGC's members actively serve consumers in the Company's service territory electing to source their power from solar photovoltaic power generation, CGC possesses an "interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.72(a)(1).

6. Further, members of the Coalition own and/or operate solar photovoltaic power generation projects in PPL's service area that are eligible for net metering under 52 Pa. Code § 75.13 and have executed Interconnection Service Agreements ("ISAs") under PPL's Commission-approved interconnection rules.

7. With Coalition members serving retail customers in the Company's service territory, the CGC has a direct and substantial interest in several of PPL's proposals, including:

a. PPL's proposed Maximum Registered Peak Load ("MRPL") tariff revisions would alter the method of assigning rate classes for customer-generators based on their highest measured demand (or estimated nameplate for new customers).

b. Under the proposal, projects with MRPL greater than 100 kW would be reassigned to Large Commercial and Industrial (LP-4/LP-5) rate schedules, where exported generation is compensated at PJM Hourly Locational Marginal Prices ("LMPs") under the GSC-2 Hourly Default Service Option—rather than the retail Price-to-Compare ("PTC") applicable to smaller or residential classes.

These changes would materially and adversely affect Petitioner's existing and planned projects by: (a) reducing the compensation value of exported generation; (b) increasing revenue volatility; (c) undermining the economic assumptions used in financing and contractual arrangements; and (d) applying to projects with existing ISAs without any grandfathering or transition mechanism.

8. Furthermore, the proposed MRPL discriminates against customer-generators in violation of 66 Pa. C. S. § 1502, by imposing costs that are not borne by similarly situated non-generating customers and by effectively reclassifying small businesses, schools, and public institutions with behind-the-meter generation into a higher-cost service group. Such treatment is inconsistent with the non-discriminatory access and least-cost procurement principles codified in 66 Pa. C. S. § 2807(e)(3.4).

9. Moreover, PPL's proposed MRPL tariff directly conflicts with the clear and unambiguous requirements of 52 Pa. Code § 75.13, which mandates that "[a]n EDC and DSP shall credit a customer-generator at the full retail kilowatt-hour rate, which shall include generation, transmission and distribution charges, for each kilowatt-hour produced by a Tier I or Tier II resource installed on the customer-generator's side of the electric revenue meter." Under that provision,

customer-generators are entitled to receive credit at the full retail rate—including all bundled components—for every kilowatt-hour produced and supplied to the grid, with any excess generation carried forward and credited in subsequent billing periods at the same retail value. By contrast, PPL’s MRPL construct would compensate exported generation from many customer-generators at wholesale PJM Locational Marginal Prices (“LMPs”) rather than the full retail rate. Such a design would unlawfully remove the distribution and transmission components from the compensation formula, in direct contravention of § 75.13, and thereby diminish the value of electricity produced by distributed renewable systems.

10. CGC is seeking to intervene in this proceeding because PPL’s proposed MRPL tariff revision, if approved, would fundamentally alter the compensation framework for customer-generators established under Pennsylvania’s Alternative Energy Portfolio Standards Act (“AEPS Act”), 73 P.S. §§ 1648.1 et seq. The AEPS Act requires that customer-generators be compensated for excess generation at the full retail value of the electricity they supply to the grid. By introducing a revenue-based maximum charge that effectively reduces or nullifies retail-rate crediting, the MRPL proposal would substitute a proxy wholesale valuation for the statutorily mandated retail value. Such a departure is inconsistent with the plain language and legislative intent of the AEPS Act.

11. CGC also has an interest in ensuring that the proposals of other parties that are advanced through testimony, legal arguments, or settlement discussions do not adversely impact the ability of CGC’s members to effectively operate as customer-generators in the PPL service territory.

12. The CGC seeks to ensure that the Commission’s decision complies with Pennsylvania’s AEPS statutory requirements (73 P.S. §§ 1648.1 et seq.), the Commission’s net-metering regulations (52 Pa. Code §§ 75.11–75.14) and the Commission’s non-discriminatory access and least-cost procurement principles codified in 66 Pa. C.S. § 2807(e)(3.4).

13. CGC's interests in this proceeding are unique from and not adequately represented by other parties that may seek to intervene, including individual customer-generators or organizations interested in solar photovoltaic power generation in Pennsylvania in general and in the Company's service territory in particular.

14. Customer-generators will be bound by the action of the Commission in this proceeding, as well as the terms and conditions related to PPL's tariff. Thus, the Commission's actions regarding the PPL's proposals may have a substantial impact on the future involvement of CGC's members in the competitive retail market and potentially strip existing customer-generators of their net-metering eligibility.

15. Intervention by CGC is in the public interest because its participation will enable CGC to contribute the unique perspectives of its members operating as licensed customer-generators in the Company's service territory and offer a complete presentation of the issues to be addressed in this proceeding. Through exploration of the issues that have been preliminarily identified by CGC, as well as others it addresses as additional information is reviewed in this proceeding, the Commission can best serve the public interest through the development of a more complete record.

16. CGC reserves the right to raise and address additional issues identified through its continued review and analysis of the filing (and related information), or other issues raised by the parties in this proceeding.

WHEREFORE, Aspen Power, 38 Degrees, CVE North America, Syncarpha Capital, LLC, Twilight Renewables, Bollinger Solar, and CEP Renewables, LLC, respectfully request that the Pennsylvania Public Utility Commission grant its Petition to Intervene, providing the Customer-Generator Coalition with full-party status in this proceeding, as well as any other relief as it deems necessary.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Daniel A. Garcia', is written over a horizontal line.

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Date: October 16, 2025

Counsel to Aspen Power, 38 Degrees, CVE North America, Syncarpha Capital, LLC, Twilight Renewables, Bollinger Solar, and CEP Renewables, LLC

VERIFICATION

DANIEL GARCIA, being duly sworn according to law, deposes and says that he is Counsel to the *ad hoc* coalition consisting of Aspen Power, 38 Degrees, CVE North America, Syncarpha Capital, LLC, Twilight Renewables, Bollinger Solar, and CEP Renewables, LLC, collectively Customer-Generator Coalition ("CGC") and that in his capacity he is authorized to and does make this affidavit for them, and state that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of his knowledge, information, and belief.

Dated:

Daniel Garcia

SWORN TO and subscribed before me this 16th day of October, 2025

Notary Public

My Commission Expires: 2/11/2029

This notarial act involved/did not involve the use of communication technology

(SEAL) Commonwealth of Pennsylvania - Notary Seal
Denise M. Williams, Notary Public
Allegheny County
My commission expires February 11, 2029
Commission number 1179230
Member, Pennsylvania Association of Notaries

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Petition to Intervene upon the following parties of record in accordance with 52 Pa. Code § 1.54 (relating to service by a participant):

VIA EMAIL ONLY

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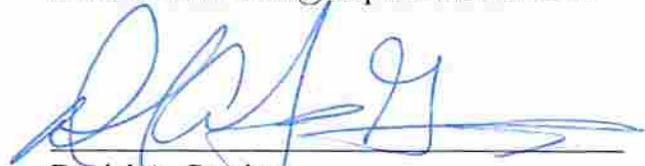
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Dated: October 16, 2025

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