

COMMONWEALTH OF PENNSYLVANIA



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October 21, 2025

Via Electronic Filing

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

Re: Second Petition of PPL Electric Utilities Corporation for Approval of Major Modifications to its Existing Long-Term Infrastructure Improvement Plan; Docket No. P-2022-3034972

Dear Secretary Homsher:

Attached for electronic filing please find the Office of Consumer Advocate's Motion for Extension of Time to File Comments, in the above-referenced proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Jacob D. Guthrie
Jacob D. Guthrie, Esq.
Assistant Consumer Advocate
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Enclosures

cc: Certificate of Service
Paul Diskin, Bureau of Technical Utility Services, pdiskin@pa.gov
Darren Gill, Bureau of Technical Utility Services, dgill@pa.gov
Kriss Brown, Law Bureau, kribrown@pa.gov

CERTIFICATE OF SERVICE

Second Petition of PPL Electric Utilities :
Corporation for Approval of Major : Docket No. P-2022-3034972
Modifications to its Existing Long-Term :
Infrastructure Improvement Plan :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Motion for Extension of Time to File Comments, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 21st day of October 2025.

SERVICE BY E-MAIL ONLY

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SERVICE BY E-MAIL ONLY(Continued)

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Dated: October 21, 2025

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Counsel for:
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities :
Corporation for Approval of a Major : Docket No. P-2022-3034972
Modification to its Existing Long-Term :
Infrastructure Improvement Plan :

UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE COMMENTS

Pursuant to 52 Pa. Code Sections 1.15 and 5.103, the Office of Consumer Advocate (OCA) files this Motion to request a 30-day extension of the deadline to file its Comments in response to the Second Petition of PPL Electric Utilities Corporation (PPL Electric) for Approval of a Major Modification to its Existing Long-Term Infrastructure Improvement Plan (LTIIP) (Petition) and avers as follows:

1. On December 22, 2022, at this docket number, PPL Electric’s current LTIIP was approved by the Commission with an effective period of December 31, 2022, through December 31, 2027.
2. On July 11, 2024, at this docket number, PPL Electric received approval from the Commission to expand its current LTIIP from total projected spending of \$511.62 million to \$715.04 million.
3. On September 25, 2025, PPL Electric filed the instant Petition.
4. In the Petition, PPL proposes to expand its current LTIIP from total projected spending of \$715.04 million to \$1,397.20 million, an increase of \$682.16 million or 95.4%. This amount includes an additional \$328.55 million to be invested during the 2026 calendar year and \$332.35 million to be invested during the 2027 calendar year. Petition at ¶¶ 32-34.

5. The vast majority of the projected increased investment is forecasted to come from investment in System Reliability Improvement Projects, which has a current budget of \$51.21 million and PPL Electric requests to expand to \$678.77 million. Petition at ¶ 38. Based on PPL Electric's proposal, System Reliability Improvement Projects would occupy approximately 48.6% of all investment for PPL Electric's current LTIP, whereas the same currently represents approximately 7.2% of all investment for the current LTIP. *Id.*

6. Other major areas of expansion include Substations, from a current budgeted amount of \$124.35 million to a requested \$161.46 million; Poles, from a current budgeted amount of \$85.27 million to a requested \$96.93 million; and Failed Equipment, from a current budgeted amount of \$189.78 million to a requested \$215.90 million. Petition at ¶¶ 42, 45, 50.

7. Under 52 Pa. Code Section 121.5(a), Comments in response to PPL's Petition are due to be filed no later than 30 days following the filing of the Petition, or October 27, 2025.

8. Based on the OCA's preliminary review of the Petition, the scope, size, and complexity of the modification – nearly doubling the anticipated investment amount by December 31, 2027 – requires significant review beyond the amount that can be provided in 30 days.

9. The OCA has retained an outside expert to provide assistance and guidance in preparation of its Comments.

10. In light of the complexity of the proposed major modification, the OCA respectfully requests that the Commission permit a 30-day extension of time to file Comments to allow for its retained expert and for more thorough review of the Petition.

11. The OCA has conferred with PPL Electric, which indicated that it does not oppose a 30-day extension of the comment period.

12. Under 52 Pa. Code Section 1.15(a)(1), whenever “an act is required or allowed to be done at or within a specified time, the time fixed or the period of time prescribed may, by the Commission, the presiding officer or other authorized person, for good cause be extended upon motion made before expiration of the period originally prescribed or as previously extended.” 52 Pa. Code § 1.15(a)(1).

13. The 30-day comment period for PPL Electric’s Petition has not yet expired.

14. If the OCA is required to submit its comments by October 27, 2025, the OCA will not be able to adequately represent the interests of consumers before the Commission and provide a position on whether PPL Electric’s proposed LTIIP modification is operationally, financially, or otherwise justified. 52 Pa. Code § 121.5(a). Further, the OCA’s retained expert will be unable to review and consider the proposed modification to provide an expert opinion to the OCA regarding the proposed modification.

15. The OCA respectfully submits that good cause exists to permit a more thorough review of PPL Electric’s Petition due to the size and scope of the modification requested by PPL Electric.

WHEREFORE, for these reasons, the OCA respectfully requests the issuance of an Order of Secretarial Letter granting this motion and extending the deadline for filing of all parties' comments to no later than 4:30 p.m. on November 26, 2025.

Respectfully submitted,

/s/ Jacob Guthrie
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