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October 27, 2025

VIA ELECTRONIC FILING

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

Re: PA Public Utility Commission, *et al.* v. PPL Electric Utilities Corporation
Docket Nos. R-2025-3057164, *et al.*

Brad and Jennifer Woolley v. PPL Electric Utilities Corporation
Docket No. C-2025-3057946

Dear Secretary Homsher:

Enclosed for filing please find a Petition to Intervene of the Coalition for Community Solar Access and the Solar Energy Industries Association (the "Joint Solar Advocates") in the above-captioned proceeding.

Copies are being served in accordance with the attached Certificate of Service. Please contact me with any questions or concerns.

Very truly yours,



Alan M. Seltzer, Esquire

AMS/psm
Enclosure
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

Docket Nos. R-2025-3057164

v.

PPL Electric Utilities Corporation

**JOINT PETITION TO INTERVENE OF THE SOLAR ENERGY INDUSTRIES
ASSOCIATION AND THE COALITION FOR COMMUNITY SOLAR ACCESS**

The Solar Energy Industries Association and Coalition for Community Solar Access, by and through their counsel, pursuant to 52 Pa. Code § 5.71. *et. seq.*, file this Joint Petition to Intervene (“Petition”) in the above-captioned proceeding before the Pennsylvania Public Utility Commission (“Commission”). In support of this Petition, the Joint Solar Advocates aver as follows:

I. Proposed Intervenors

1. The proposed Intervenors are the Solar Energy Industries Association (“SEIA”) and Coalition for Community Solar Access (“CCSA”) (collectively, the “Joint Solar Advocates”). The Joint Solar Advocates have the following address: 1380 Monroe Street NW, #721, Washington, DC 20010 (CCSA) and 1425 K St. NW #1000, Washington, DC 20005 (SEIA).

2. The Joint Solar Advocates are represented in the above-captioned matter by the following counsel:

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3. SEIA is the national trade association for the United States solar industry. SEIA works to support solar energy by expanding markets, reducing costs, increasing generation reliability, removing market barriers, and providing education on the benefits of solar energy and energy storage. SEIA works with its 1,200 member companies and other strategic partners to advocate for policies that promote the aforementioned goals. SEIA's member companies include manufacturers of solar power equipment, residential, community solar, commercial, and utility-scale solar developers, installers, construction firms, investment firms, service providers including those who are customer-generators engaging in net metering. SEIA has over 30 member companies located in Pennsylvania, and several national firms also conducting business in the Commonwealth. SEIA was previously granted intervention as part of the "Joint Solar Parties" in connection with PPL Electric Utilities Corporation's ("PPL" or "the Company") recent petition for approval of its Second Distributed Energy Resources Management Plan at Commission Docket No. P-2024-3049223.

4. CCSA is a 501(c)(6) nonprofit trade organization focused on supporting the community solar industry through legislative and regulatory efforts. Net metering by customer-generators can be an element of community solar systems. CCSA's mission is to empower every American energy consumer with the option to choose local, clean, and affordable community solar. CCSA works with customers, utilities, local stakeholders, and policymakers to develop and implement policies and best practices that ensure community solar programs provide a win for all affected stakeholders, starting with the customer. CCSA has over 120 member companies and is active in virtually all state-level community solar markets, as well as the federal

level. CCSA is an active participant in community solar issues pending before the Pennsylvania General Assembly, which includes net metering by customer generators. Many of CCSA's members develop community-scale solar and solar-plus-storage projects, either with or without subscribers. CCSA advocates for its members' interest in creating and expanding opportunities to develop distributed resources sited close to load that enhance system resilience and reduce overall system costs. CCSA's membership list is publicly available at <https://communitysolaraccess.org/memberships/our-members>

5. CCSA and SEIA members are currently developing hundreds of megawatts of distributed generation projects in PPL's service territory, representing multiple millions of dollars of investment, that would be adversely impacted by PPL's") proposed changes to the classification and treatment of customer-generators.

II. Background

6. On September 30, 2025, pursuant to Section 1308(8) of the Public Utility Code, 66 Pa. C.S. §1308(d), the Company filed Original Tariff Electric – Pa. P.U.C. No. 202 ("Tariff No. 202") with the Commission.

7. Among other things, PPL's Tariff No. 202 proposes to increase the Company's annual distribution revenue by approximately \$356 million, or approximately 33.42%.

8. In addition, the Company is proposing to assign default supply customers on the Generation Supply Charge ("GSC") to Rate GSC-1 and Rate GSC-2 based on their maximum registered peak load, as defined by the Company's proposed tariff filed in this proceeding. This new approach is discussed by Company witness Andrew Castanaro PPL Statement No. 15.

III. Standards for Intervention

9. Eligibility to intervene in Commission proceedings is governed by 52 Pa. Code § 5.72, which provides in relevant part that “[a] petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought.” 52 Pa. Code § 5.72(a). Section 5.72 further provides that the right or interest may be one “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)(2). Intervention is also permitted where participation of person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A “person” includes a corporation and an association. 52 Pa. Code § 1.8.

IV. Reasons for Intervention

10. The Joint Solar Advocates meet the standards for intervention set forth in 52 Pa. Code § 5.72(a). As organizations whose members include renewable energy developers, installers, and investors, SEIA and CCSA have interests that will be directly affected by this proceeding.

11. The ability of the Joint Solar Advocates’ members to develop and install renewable energy projects in the Company’s service territory that may utilize net metering as customer-generators will be specifically and substantially affected by the outcome of this proceeding.

12. The Joint Solar Advocates’ interests in this proceeding are unique from and not adequately represented by other parties that may seek to intervene, including individual solar developers or other organizations interested in renewable energy generation in Pennsylvania in

general, and in the Company's service territory in particular. This is because SEIA and CCSA represent the interests of a diverse and broad group of renewable energy and customer-generator companies in general, and not the interests of any individual member.

13. PPL's base rate filing proposes tariff revisions, among other things, designed to change the distribution rate classification of a targeted category of customers, i.e., customer-generators.

14. PPL in part argues that what it characterizes as "no load" net metering customers and installations have substantial generation output and negligible net demand that make them look like large commercial and industrial customers due to their impacts on infrastructure, financial investment and the grid. PPL Statement No. 15, p. 3.

15. To address this perceived issue, PPL is proposing to revise the definition of "maximum registered peak load" in its tariff to account for not only peak demand, but also peak export. PPL Statement No. 15, p. 4.

16. If approved, PPL's revised tariffed rate classifications may substantially reduce the compensation that renewable energy customer-generators receive for excess generation, which would dramatically impact the feasibility of investing in and developing renewable energy projects in PPL's service territory.

17. Moreover, if approved, the revised tariff would likely substantially increase the demand charges for electric delivery service paid by customer-generators.

18. After preliminary review of PPL's base rate filing, the Joint Solar Advocates believe that certain of the proposed changes: (1) may violate the Alternative Energy Portfolio Standards ("AEPS") Act, *see* 73 P.S. §§ 1648.1 – 1648.8 and 66 Pa.C.S. § 2814 and its

related caselaw; (2) may violate certain requirements of the Public Utility Code and the Commission's regulations; and (3) are unjust, unreasonable and not in the public interest.

19. The Joint Solar Advocates' members will be bound by the action of the Commission in this proceeding, which will determine whether PPL's proposed rate re-classifications go into effect.

20. Both SEIA and CCSA have a cognizable interest in ensuring that renewable energy customer-generators and developers in the Commonwealth of Pennsylvania are treated fairly by public utilities like PPL, and in conformance with the AEPS Act and the Public Utility Code.

21. The Joint Solar Advocates' intervention is in the public interest, as their participation will enable them to contribute the unique perspectives and insights of trade associations representing solar developers, prospective customer generators, renewable energy investors, and other parties who have a vested interest in the ability build and operate renewable energy projects in every Electric Distribution Company ("EDC") territory throughout the Commonwealth. Accordingly, the Joint Solar Advocates' participation will aid in a comprehensive presentation of issues to be addressed in this proceeding.

22. The Joint Solar Advocates are continuing to review PPL's base rate filing and supporting testimony and will be identifying the specific issues to be addressed in this proceeding. Due to the early stage of this proceeding, the Joint Solar Advocates reserve the right to raise and address issues identified through continued review and analysis of PPL's filing (and related information), as well as issues raised by other parties.

23. For the reasons set forth above, the Joint Solar Advocates meet the requirements of 52 Pa. Code § 5.72, as they and their members will be governed by the Commission's action in this proceeding, and they and their members' interests are not currently

and cannot be represented by any other party. As such, the Joint Solar Advocates respectfully request that their intervention be granted and that they be afforded full active party status in this proceeding.

WHEREFORE, the Joint Solar Advocates respectfully request that the Pennsylvania Public Utility Commission grant their Joint Petition to Intervene in the above-captioned matter, afford the Joint Solar Advocates full active party status throughout the pendency of this proceeding, and grant such other relief as may be just and reasonable.

Respectfully submitted,



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Dated: October 27, 2025

VERIFICATION

I, Blake Elder, Senior Policy Manager for CCSA, hereby state that the facts set forth 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 27, 2025

By: *Blake Elder*
Blake Elder
Senior Policy Manager for CCSA

VERIFICATION

I, Leah Meredith, Director, State Affairs, Mid-Atlantic Region, SEIA, hereby state that the facts set forth 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 27, 2025

By:

A handwritten signature in black ink, appearing to read "Leah Meredith", written over a horizontal line.

Leah Meredith
Director, State Affairs, Mid-Atlantic Region, SEIA

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this filing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA EMAIL ONLY

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Dated: October 27, 2025



Alan M. Seltzer