



October 28, 2025

VIA E-FILING

Secretary Matthew L. Homsher
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,

Please find enclosed the Petition to Intervene of the Energy Justice Advocates. As indicated on the attached Certificate of Service, service on the parties was accomplished by email only. Should you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,

/s/ Devin McDougall

PA Attorney ID No. 329855

Supervising Senior Attorney

Earthjustice

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(267) 690-5595

Counsel for the Energy Justice Advocates

cc:

Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et al.

R-2025-3057164

v.

PPL Electric Utilities Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the following document upon the parties of record to this proceeding, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party) in the manner and upon the persons listed below.

Service By Email Only

<p>Kimberly A. Klock, Esq. Michael J. Shafer, Esq. PPL Services Corporation 645 Hamilton Street, Suite 700 Allentown, PA 18104 kklock@pplweb.com mjshafer@pplweb.com</p>	<p>David B. MacGregor, Esq. Garrett P. Lent, Esq. Post & Schell, P.C. 17 North Second Street 12th Floor Harrisburg, PA 17101-1601 dmacgregor@postschell.com glent@postschell.com</p>
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Dated: October 28, 2025

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et
al.

R-2025-3057164

v.

PPL Electric Utilities Corporation

**PETITION TO INTERVENE AND PROTEST
OF THE ENERGY JUSTICE ADVOCATES**

October 28, 2025

Pursuant to 52 Pa. Code §§ 5.72-5.75 and §§ 5.51-5.53, Clean Air Council, Vote Solar, and the Union of Concerned Scientists (collectively, the “Energy Justice Advocates” or “EJA”) hereby respectfully submit this Petition to Intervene and Protest in the above-captioned proceeding (the “Proceeding”) of the Pennsylvania Public Utility Commission (the “Commission”). In support thereof, the Energy Justice Advocates state as follows:

I. Background

1. On September 30, 2025, PPL Electric Utilities Corporation submitted a rate filing, PPL Original Tariff Electric – Pa. P.U.C. No. 202, seeking a general rate increase of approximately \$356 million, or 33.42%, over existing revenues (the “2025 Rate Filing”).

2. On October 22, 2025, the Commission initiated this Proceeding to investigate the justness and reasonableness of the rate increase and other changes proposed in PPL’s 2025 Rate Filing at the above-captioned docket number.

II. Eligibility to Intervene and Standing

3. The Commission’s regulations provide 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.”¹ A “person” includes a corporation and an association.²

¹ 52 Pa. Code § 5.72(a).

² 52 Pa. Code § 1.8(a); *See also Energy Conservation Council of Pennsylvania v. Pub. Util. Comm’n*, 995 A.2d 465, 476 (Pa. Commw. Ct. 2010) (“An association may have standing as a representative of its members...Thus, as long as an organization ‘has at least one member who has or will suffer a direct, immediate, and substantial injury to an interest as a result of the challenged action[, i.e., is aggrieved, the organization] has standing.’”) (internal citation omitted).

4. Under 52 Pa. Code § 5.72(a)(2), a person meets eligibility criteria for intervention if it has “[a]n 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.”³

5. Under 52 Pa. Code § 5.72(a)(3), a person can also meet eligibility criteria for intervention if it has “another interest of such nature that participation of the petitioner may be in the public interest.”⁴

A. Clean Air Council

6. Clean Air Council meets the eligibility criteria of 52 Pa. Code § 5.72(a)(2), since it will be directly affected by the Proceeding, its interests are not adequately represented by existing parties in the Proceeding, and its participation in the Proceeding would be in the public interest.

7. Clean Air Council, founded in 1976, is a Pennsylvania not-for-profit public interest advocacy organization that is dedicated to protecting everyone’s right to a healthy environment, including everyone’s right to breathe clean air.

8. Members of Clean Air Council will be directly impacted by this proceeding and bound by the Commission’s action in it. Members of Clean Air Council live within PPL’s service territory, are customers of PPL, and will be subject to the outcome of this proceeding, including through impacts to their electric bills and the reliability, quality, and safety of their electric service.

³ 52 Pa. Code § 5.72(a)(2).

⁴ 52 Pa. Code § 5.72(a)(3).

9. Clean Air Council has an interest in ensuring that PPL's rates are just and reasonable, including with respect to affordability, sustainability, and the emerging issues relating to costs associated with large load customers. Clean Air Council's interests in these areas would not be adequately represented by existing parties in this proceeding.

10. Additionally, Clean Air Council also meets the eligibility criteria of 52 Pa. Code § 5.72(a)(3) because it would serve the public interest for Clean Air Council to participate in this Proceeding. As the Commission has recognized, active participation by public interest organizations aids the Commission in protecting the public's welfare and advancing the public interest.⁵

11. Clean Air Council is a long-standing 501(c)(3) nonprofit public interest organization with expertise on energy issues. Clean Air Council has also participated as a party in numerous recent Commission proceedings, in which it helped develop the record through submitting expert testimony and contributed to the development of settlement agreements approved as in the public interest by the Commission.⁶

⁵ As the Commission has noted, "In the context of a general rate increase case such as this one, the Commission is aided by the active participation of entities representing various subgroups of the entire public. A number of these active participants have a statutorily imposed obligation to provide this representation, while others are self-created entities choosing to represent a delineated subgroup. Taken as a whole, these active participants cover the entire spectrum of the public whose welfare is to be protected." Opinion and Order, *Pennsylvania Pub. Util. Comm'n, et al. v. UGI Utils., Inc. – Elec. Div.*, PA PUC Docket Nos. C-2021-3024200 et al., at *20–21 (Oct. 28, 2021).

⁶ See, e.g., Opinion and Order, *Pennsylvania Pub. Util. Comm'n, et al. v. Philadelphia Gas Works*, PA PUC Docket Nos. R-2025-3053112 et al. (Oct. 9, 2025) (approving settlement, to which Clean Air Council was a party, of PGW rate case); Opinion and Order, *Petition of PECO Energy Company for Approval of Its Default Service Program for the Period From June 1, 2025, Through May 31, 2029*, PA PUC Docket No. P-2024-3046008 et al. (Nov. 7, 2024) (approving settlement, to which Clean Air Council was a party, of PECO default service program case).

B. Vote Solar

12. Vote Solar meets the eligibility criteria of 52 Pa. Code § 5.72(a)(2), since it will be directly affected by the Proceeding, its interests are not adequately represented by existing parties in the Proceeding, and its participation in the Proceeding would be in the public interest.

13. Vote Solar is a not-for-profit public interest advocacy organization that works to achieve a 100% clean energy future that supports the needs, health, and well-being of everyone. Founded in 2002, Vote Solar advocates for clean energy in legislative and regulatory arenas at the state level, where most decisions about electricity are made.

14. Members of Vote Solar will be directly impacted by this proceeding and bound by the Commission's action in it. Members of Vote Solar live within PPL's service territory, are customers of PPL, and will be subject to the outcome of this proceeding, including through impacts to their electric bills and the reliability, quality, and safety of their electric service.

15. Vote Solar has an interest in ensuring that PPL's rates are just and reasonable, including with respect to affordability, sustainability, and the emerging issues relating to costs associated with large load customers. Vote Solar's interests in these areas would not be adequately represented by existing parties in this proceeding.

16. Additionally, Vote Solar also meets the eligibility criteria of 52 Pa. Code § 5.72(a)(3) because it would serve the public interest for Vote Solar to participate in this Proceeding. As the Commission has recognized, active participation by public interest organizations aids the Commission in protecting the public's welfare and advancing the public interest.⁷

⁷ As the Commission has noted, "In the context of a general rate increase case such as this one, the Commission is aided by the active participation of entities representing various subgroups of the entire public. A number of these active participants have a statutorily imposed obligation to provide this representation, while others are self-created

17. Vote Solar is a long-standing 501(c)(3) nonprofit public interest organization with expertise on energy issues. Vote Solar has also participated as a party in numerous recent Commission proceedings, in which it helped develop the record through submitting expert testimony and contributed to the development of settlement agreements approved as in the public interest by the Commission.⁸

C. Union of Concerned Scientists

18. Union of Concerned Scientists (“UCS”) meets the eligibility criteria of 52 Pa. Code § 5.72(a)(2), since it will be directly affected by the Proceeding, its interests are not adequately represented by existing parties in the Proceeding, and its participation in the Proceeding would be in the public interest.

19. UCS is a national nonprofit organization founded more than 50 years ago by scientists and students at the Massachusetts Institute of Technology. The mission of UCS is to put rigorous, independent science into action, developing solutions and advocating for a healthy, safe, and just future.

20. Members of UCS will be directly impacted by this proceeding and bound by the Commission’s action in it. Members of UCS live within PPL’s service territory, are customers of PPL, and will be subject to the outcome of this proceeding, including through impacts to their electric bills and the reliability, quality, and safety of their electric service.

entities choosing to represent a delineated subgroup. Taken as a whole, these active participants cover the entire spectrum of the public whose welfare is to be protected.” Opinion and Order, *Pennsylvania Pub. Util. Comm’n, et al. v. UGI Utils., Inc. – Elec. Div.*, PA PUC Docket Nos. C-2021-3024200 et al., at *20–21 (Oct. 28, 2021).

⁸ See, e.g., Opinion and Order, *Pennsylvania Pub. Util. Comm’n, et al. v. Philadelphia Gas Works*, PA PUC Docket Nos. R-2025-3053112 et al. (Oct. 9, 2025) (approving settlement, to which Vote Solar was a party, of PGW rate case); Opinion and Order, *Petition of PECO Energy Company for Approval of Its Default Service Program for the Period From June 1, 2025, Through May 31, 2029*, PA PUC Docket No. P-2024-3046008 et al. (Nov. 7, 2024) (approving settlement, to which Vote Solar was a party, of PECO default service program case).

21. UCS has an interest in ensuring that PPL's rates are just and reasonable, including with respect to affordability, sustainability, and the emerging issues relating to costs associated with large load customers. UCS's interests in these areas would not be adequately represented by existing parties in this proceeding.

22. Additionally, UCS also meets the eligibility criteria of 52 Pa. Code § 5.72(a)(3) because it would serve the public interest for UCS to participate in this Proceeding. As the Commission has recognized, active participation by public interest organizations aids the Commission in protecting the public's welfare and advancing the public interest.⁹

23. UCS is a long-standing 501(c)(3) nonprofit public interest organization with expertise on energy issues. UCS has also engaged in extensive public education and advocacy on energy issues and previously participated in the Commission's policymaking proceeding addressing the utilization of storage resources as electric distribution assets.¹⁰

III. Position Regarding the Issues in the Proceeding

24. The Energy Justice Advocates are continuing to review PPL's 2025 Rate Filing and anticipate investigating its basis through discovery in this Proceeding.

25. On preliminary review of PPL's 2025 Rate Filing, EJA object to its approval on the grounds that PPL has not sufficiently demonstrated that approval of its 2025 Rate Filing

⁹ As the Commission has noted, "In the context of a general rate increase case such as this one, the Commission is aided by the active participation of entities representing various subgroups of the entire public. A number of these active participants have a statutorily imposed obligation to provide this representation, while others are self-created entities choosing to represent a delineated subgroup. Taken as a whole, these active participants cover the entire spectrum of the public whose welfare is to be protected." Opinion and Order, *Pennsylvania Pub. Util. Comm'n, et al. v. UGI Utils., Inc. – Elec. Div.*, PA PUC Docket Nos. C-2021-3024200 et al., at *20–21 (Oct. 28, 2021).

¹⁰ Final Policy Statement Order, *Utilization of Storage Resources as Electric Distribution Assets*, PA PUC Docket No. M-2020-3022877 (Apr. 4, 2024).

would be just and reasonable, consistent with the Commonwealth's laws and policies, and consistent with sound ratemaking principles.

26. EJA are concerned that PPL's 2025 Rate Filing could result in unjust and unreasonable rates, may be inconsistent with the law and policies of the Commonwealth, and may be contrary to sound ratemaking principles.

27. If PPL's rate increase is approved in its entirety, the monthly bill of a typical PPL residential customer receiving default service and using 1,000 kilowatt-hours (kWh) per month would increase from \$191.49 to \$204.86, or by 6.98%, which raises concerns about affordability.

28. Additionally, it has been over 10 years since PPL's last rate increase request, which raises concerns about rate shock.

29. EJA are concerned that PPL's 2025 Rate Filing may not reflect best practices to control capital and operating costs, minimize the need for rate increases, and protect affordability for all customer classes in the long-term.

30. EJA are concerned that PPL's 2025 Rate Filing may not reflect adequate measures to ensure that any rate increase resulting from this Proceeding is no larger than necessary and is equitably distributed among customer classes.

31. EJA are concerned that PPL's 2025 Rate Filing may not reflect best practices for planning, building out, and operating its distribution infrastructure in a manner consistent with ensuring equitable and affordable access for all customer classes to the benefits of clean energy.

32. EJA reserves the right to raise and address such additional issues relating to PPL's 2025 Rate Filing as may arise on further review, analysis, and discovery.

IV. Counsel

33. The Energy Justice Advocates are represented in this matter by:

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34. EJA consent to receive electronic service of documents as provided in 52 Pa. Code § 1.54(b)(3).

35. EJA respectfully request that the following individuals receive service of any documents served via electronic mail to EJA:

- a. Devin McDougall, Esq., dmcdougall@earthjustice.org
- b. Logan Welde, Esq., lwelde@cleanair.org
- c. Lauren Otero, Esq., lotoero@cleanair.org

V. Conclusion

WHEREFORE, the Energy Justice Advocates respectfully submit this Petition to Intervene and Protest and respectfully request that the Commission grant them status as full parties to this Proceeding and such other relief as may be just and reasonable.

Dated: October 28, 2025

Respectfully submitted,

/s/ Devin McDougall

PA Attorney ID No. 329855

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Counsel for the Energy Justice Advocates

VERIFICATION

I hereby verify that the facts contained in the foregoing Petition to Intervene and Protest are true and accurate to the best of my knowledge, information, and belief, that I am duly authorized to make this verification, and that I expect to be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: October 28, 2025

/s/ Devin McDougall
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