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October 28, 2025

VIA E-FILING

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 Dimension PA 1 LLC's Petition to Intervene in the above-referenced matter. Copies will be served in accordance with the attached Certificate of Service.

Best regards,

A handwritten signature in blue ink that reads "Daniel B. Markind". The signature is written in a cursive, flowing style.

Daniel B. Markind

DBM/lm

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

v.

Docket No. R-2025-3057164

PPL Electric Utilities Corporation

PETITION TO INTERVENE OF DIMENSION PA 1 LLC

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, Dimension PA 1 LLC (“Dimension”), hereby files 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, Dimension 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**

2. Dimension is the parent of many special purpose entity limited liability companies (“SPEs”) that are engaged in the development, ownership, and operation of solar photovoltaic power generation throughout the Commonwealth, including within PPL’s service territory.

3. The attorney for Dimension in this matter is:

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

III. DIMENSION MEETS THE STANDARDS FOR INTERVENTION

4. Dimension meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). Dimension owns numerous SPEs in the Company’s service territory that are customers of the utility generating power from solar photovoltaic power generation. As such, Dimension 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).

5. Dimension’s SPEs own 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.

6. As Dimension’s SPEs are retail customers in the Company’s service territory, Dimension has a direct and substantial interest in several of PPL’s proposals. For

example:

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 greater of their highest measured demand or generator's nameplate capacity.

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 a Price-to-Compare ("PTC") rate that is lower than the rate that would be applicable under the project's previously applicable small general service rate.

These changes would materially and adversely affect Dimension'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.

7. Dimension 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 Dimension members to effectively operate as customer-generators in the PPL service territory.

8. Dimension seeks to ensure that the Commission's decision complies with Pennsylvania's AI PS 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).

9. Dimension'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.

10. 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 Dimension in the PPL's service territory.

11. Intervention by Dimension is in the public interest because its participation will enable Dimension 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 Dimension, as well as others, that it addresses in this proceeding, the Commission can best serve the public interest through the development of a more complete record.

12. Dimension 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, Dimension PA 1 LLC respectfully requests that the Pennsylvania Public Utility Commission grant its Petition to Intervene, providing the Customer-Generator Dimension with full-party status in this proceeding, as well as any other relief as it deems necessary.

Respectfully submitted,



Dated: October 28, 2025

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Counsel to Dimension PA 1 LLC

VERIFICATION

BRANDON SMITHWOOD, being duly sworn according to law, deposes and says that he is an Vice President of Dimension and that in this capacity he is authorized to and does make this affidavit for them, and states that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of his knowledge, information, and belief, and that he expects to be able prove the same at a hearing 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).

Dated: October 28, 2025



Brandon Smithwood, Vice President

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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Dated: October 28, 2025



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