



VIA E-FILE

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
Petition to Intervene

Dear Secretary Homsher:

Please find the attached Petition to Intervene of Environmental Defense Fund, Natural Resources Defense Council, and Citizens for Pennsylvania's Future in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully submitted,

/s/ Emma H. Bast

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility
Commission

v.

Docket No. R-2025-3057164

PPL Electric Utilities Corporation

**PETITION TO INTERVENE OF
ENVIRONMENTAL DEFENSE FUND, NATURAL RESOURCES DEFENSE
COUNCIL, and CITIZENS FOR PENNSYLVANIA’S FUTURE**

CITIZENS FOR PENNSYLVANIA’S
FUTURE

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October 29, 2025

ENVIRONMENTAL DEFENSE FUND

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Pursuant to the provisions of the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (“PUC” or “Commission”), 52 Pa. Code §§ 5.61–5.76, the Environmental Defense Fund (“EDF”), Natural Resources Defense Council (“NRDC”), and Citizens for Pennsylvania’s Future (“PennFuture”) (collectively, “Environmental Petitioners”), through counsel, hereby petition the Pennsylvania Public Utility Commission (“Commission”) to intervene in the above-captioned proceeding. In support thereof, Environmental Petitioners state as follows:

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

2. Petitioner EDF is a nonprofit corporation whose mission is to preserve the natural systems on which all life depends. Guided by science and economics, EDF finds practical and lasting solutions to the most serious environmental problems. EDF has a strong interest in ensuring an equitable and affordable clean energy transition. EDF has over 16,000 members in Pennsylvania.

3. Petitioner NRDC is an international nonprofit, membership-based environmental organization founded in 1970. NRDC is dedicated to protecting the world’s natural resources, public health, and the environment. NRDC has more than

325,000 members in the United States, including more than 12,000 in Pennsylvania who are ratepayers subject to increased costs and risks associated with the projected growth in large load customers.

4. Petitioner PennFuture is a Pennsylvania non-profit organization whose mission includes protecting our air, water, and land, and empowering citizens to build sustainable communities for future generations. PennFuture is dedicated to promoting a clean, just, and equitable energy economy. Members of PennFuture and PennFuture itself are ratepayers who will experience the effects of increased costs and risks associated with projected growth in large load customers across the service territory.

5. Environmental Petitioners have members in the PPL service territory and have an interest in the impact that the proposed rate increase will have on customers.

6. If PPL Electric's request is approved, 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%. This increase would directly and dramatically impact Environmental Petitioners and their members.

7. Environmental Petitioners and Environmental Petitioners' members will be directly affected by the outcome of this proceeding.

8. 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).

9. 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).

10. A “person” includes associations, and other business organizations. 52 Pa. Code. § 1.8.6.

11. The Commonwealth Court has consistently stated that “an association may have standing as a representative of its members . . . 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.” *Energy Cons. Council of Pa. v. Pa. PUC*, 995 A.2d 465, 476 (Pa. Commw. 2010) (alteration in original) (*citing Tripps Park v. Pa. PUC*, 415

A.2d 967 (Pa. Commw. 1980); *Parents United for Better Schools v. School District of Philadelphia*, 646 A.2d 689 (Pa. Commw. 1994)).

12. Environmental Petitioners have standing to intervene because their members have or will suffer a direct, immediate, and substantial injury to an interest as a result of this proceeding. *See Energy Cons. Council of Pa.*, 995 A.2d at 476.

13. Additionally, 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.”

14. Environmental Petitioners are environmental organizations with missions to promote and support Pennsylvania’s clean energy future, including advancing rate and utility structures that facilitate fair and reasonable rates and the growth of renewable energy sources. These are integral areas to their missions and large parts of the operations of each organization. *See, e.g., Applewhite v. Commonwealth*, 2014 Pa. Commw. Unpub. LEXIS 756, 21 (Pa. Commw., Jan. 17, 2014).

15. It would serve the public interest for Environmental Petitioners to participate in this proceeding.

16. PPL Electric also proposes various tariffs and programs that may materially affect the terms, conditions, fuel source, or quality of electric service it provides to Environmental Petitioners' members.

17. Environmental Petitioners have preliminarily reviewed PPL Electric's rate filing, and object to the request on the grounds that PPL Electric's proposals could result in unjust and unreasonable rates that would impose severe hardship on their members.

18. Environmental Petitioners, on behalf of their members and their organizational missions, have an interest in ensuring that PPL Electric maximizes cost-effective, clean energy. Participation in this proceeding is an appropriate way to protect these rights and interests. *See* 52 Pa. Code § 5.71–74.

19. Environmental Petitioners have an interest in ensuring that their members are not adversely or disproportionately impacted by the interconnection of data centers and large loads.

20. Environmental Petitioners have an interest in ensuring that they, their members, and other customer classes are not disproportionately or inequitably impacted by PPL Electric's planning, buildout, and operation of its distribution infrastructure.

21. Environmental Petitioners have an interest in other issues that may impact their members as a result of this proceeding, including but not limited to: cost allocation; rate design including the proposed electric vehicle time of use rate pilot; cost allocation for large load interconnections; grid edge technologies and programs; and net metering.

22. Environmental Petitioners reserve the right to raise other issues as necessary and appropriate during the course of the proceeding and to respond to issues raised by other parties.

23. Environmental Petitioners' interests in and perspectives on issues in this proceeding that are not adequately represented by other parties of record.

24. Environmental Petitioners are represented in this proceeding by:

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Counsel for Petitioners consent to the service of documents by electronic mail to bast@pennfuture.org, as provided in 52 Pa. Code § 1.54(b)(3).

25. For the reasons set forth above, Environmental Petitioners request that the Commission grant this Petition and confer status as an intervenor in this proceeding.

WHEREFORE, Environmental Petitioners respectfully request that the Commission grant this Petition to Intervene, provide Petitioners with full-party status in this proceeding, and allow such other relief as it deems necessary.

Dated: October 29, 2025

Respectfully submitted,

/s/ Emma H. Bast

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VERIFICATION

I, Emma Bast, legal counsel for Citizens for Pennsylvania's Future (PennFuture), on behalf of PennFuture and its clients, verify that the factual allegations contained in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.

Dated: October 29, 2025

/s/ Emma H. Bast

Emma H. Bast

Counsel for Environmental Petitioners



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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

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