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October 29, 2025

Via Electronic 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, Coalition For Affordable Utility Services and Energy Efficiency in Pennsylvania, Office of Small Business Advocate, Brad and Jennifer Wooley v. PPL Electric Utilities Corporation

Docket Nos. R-2025-3057164, C-2025-3057844, C-2025-3057889, C-2025-3057946

Dear Secretary Homsher:

Please find enclosed for filing with the Pennsylvania Public Utility Commission the Motion for Leave to Amend Petition to Intervene of the Customer-Generator Coalition, ("CGC") in the above captioned proceeding.

As shown by the attached Certificate of Service, all parties to these proceedings are being duly served.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Daniel Garcia', written over a horizontal line.

Daniel Garcia, Of Counsel
STEPTOE & JOHNSON PLLC

CC: Hon. Christopher P. Pell, (email only)
Hon. Barbara Shadie Nause, (email only)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2025-3057164
Coalition For Affordable Utility Services	:	
and Energy Efficiency in Pennsylvania	:	C-2025-3057844
Office of Small Business Advocate	:	C-2025-3057889
Brad and Jennifer Wooley	:	C-2025-3057946
	:	
	:	
v.	:	
	:	
PPL Electric Utilities Corporation	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system the foregoing Motion to Amend Petition to Intervene and that I have served a true and correct copy of the same upon the following parties of record in accordance with 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

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Dated: October 29, 2025

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Daniel A. Garcia (PA Attorney ID 311503)
Counsel for Customer-Generator Coalition

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Coalition For Affordable Utility Services	:	
and Energy Efficiency in Pennsylvania	:	R-2025-3057164
Office of Small Business Advocate	:	
Brad and Jennifer Wooley	:	C-2025-3057844
	:	C-2025-3057889
	:	C-2025-3057946
v.	:	
	:	
PPL Electric Utilities Corporation	:	

**MOTION TO AMEND PETITION TO INTERVENE OF
ASPEN POWER, 38 DEGREES, CVE NORTH AMERICA, SYNCARPHA CAPITAL,
LLC, TWILIGHT RENEWABLES, BOLLINGER SOLAR, AND CEP RENEWABLES**

Pursuant to Sections 1.81, 5.103(a)-(b) and 5.91 of Pennsylvania Public Utility Commission’s (“Commission”) Regulations, 52 Pa. Code §§ 1.81, 5.103(a)-(b), 5.91(c), Aspen Power, 38 Degrees, CVE North America, Syncarpha Capital, LLC, Twilight Renewables, Bollinger Solar, and CEP Renewables, LLC, collectively as the Customer-Generator Coalition (“CGC” or “Coalition”), by and through its undersigned counsel, Steptoe & Johnson PLLC, respectfully submits this Motion to Amend Petition to Intervene in the above-captioned proceeding.

The Coalition respectfully states that this Motion to Amend and the accompanying Amended Petition to Intervene are filed solely for the limited purpose of updating the list of participating entities. The Coalition does not intend, and this filing shall not be construed, to supersede, withdraw, or replace its original Petition to Intervene filed in this proceeding. All factual averments, legal arguments, and requests for relief contained in the original Petition are

hereby expressly preserved and incorporated by reference as though fully set forth herein. The Amended Petition merely supplements the prior filing to reflect the addition of new parties and shall not constitute a waiver or modification of any prior statements or claims.

In support of this Motion, the Coalition states as follows:

I. BACKGROUND

1. On September 30, 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 PPL’s proposed Electric Generation Supplier Coordination Tariff and sets forth PPL’s rules, regulations, charges, and riders for its provision of coordination services to electric generation suppliers (“EGSs”).

2. On October 15, 2025, the Coalition filed its Petition to Intervene in this docket. The Petition was accepted and the Coalition was granted party status in the proceeding.

3. The Commission, by Order entered October 24, 2025, suspended PPL’s proposed Tariff Electric Pa. P.U.C. Nos. 202 and 2S for investigation pursuant to 66 Pa.C.S. § 1308(d) and assigned this matter to the Office of Administrative Law Judge (“OALJ”) for hearings and the issuance of a Recommended Decision.

4. Since filing its initial Petition, the Coalition has experienced strong interest from additional entities seeking to join and participate formally as members. These entities have direct, substantial, and legally protectable interests in the outcome of this proceeding because they currently operate, or have pending interconnection applications for, renewable generation facilities within PPL’s service territory that would be materially affected by the proposed tariff changes.

5. The addition of these entities will ensure that the Commission has a full and representative record of the potential impacts of the proposed tariff revisions across Pennsylvania's renewable-energy sector.

6. The Coalition therefore seeks leave to amend its Petition to Intervene pursuant to 52 Pa. Code §§ 1.81 and 5.91 to (1) add additional entities as parties to the proceeding and (2) update the names of existing Coalition members to reflect their official corporate designations. This amendment is intended solely to ensure administrative accuracy and completeness of the record and is not intended to supersede or replace the Coalition's original Petition to Intervene. All prior averments, arguments, and requests for relief set forth therein are hereby preserved and incorporated by reference as though fully set forth at length herein.

II. LEGAL STANDARD

7. Section 5.91 of the Commission's regulations allow for the "modification of or supplement to an application, complaint, petition or other pleading." 52 Pa. Code § 5.91(a). Further, Section 1.81 of the Commission's regulations states, "[a]n amendment to a submittal or pleading may be tendered for filing at any time and will be deemed filed in accordance with § 1.11 (relating to date of filing) unless the Commission otherwise orders." 52 Pa. Code § 1.81(a); *see also* 1 Pa. Code § 33.41. Under these regulations, the Coalition's right to amend its Petition at this time is indisputable.

8. The requested amendment does not alter the substantive issues raised in the Coalition's original Petition, nor does it change the scope or posture of the Coalition's participation. Rather, it ensures that all affected customer-generators are represented under a unified procedural umbrella, avoiding duplicative filings and unnecessary procedural complexity.

III. GOOD CAUSE EXISTS TO GRANT THIS MOTION

9. Each of the additional entities identified in Exhibit A has a direct and immediate financial and operational interest in the subject matter of this proceeding. Their projects either hold Commission-approved net-metering certifications or are in advanced stages of interconnection within PPL's distribution system.

10. PPL's proposed tariff revisions would, if approved, substantially affect these entities' existing and planned operations by altering rate classifications, export crediting mechanisms, and AEC ownership rights. Their participation will contribute valuable factual and technical evidence regarding the potential impacts of the proposed tariff.

11. Granting this Motion will not delay the proceeding, prejudice any party, or impose additional procedural burdens. The Coalition continues to be represented by the same counsel of record, ensuring continuity and efficiency.

12. The requested amendment is thus consistent with the Commission's policy favoring broad and inclusive participation by affected stakeholders in rate proceedings involving statewide policy implications.

WHEREFORE, Aspen Power, 38 Degrees, CVE North America, Syncarpha Capital, LLC, Twilight Renewables, Bollinger Solar, and CEP Renewables, LLC, collectively as the Customer-Generator Coalition, respectfully requests that the Pennsylvania Public Utility Commission (i) grant this Motion for Leave to Amend its Petition to Intervene for the limited purpose of updating the list of participating entities; (ii) deem the Amended Petition to Intervene, attached as Exhibit A, as supplementing, not superseding, the Coalition's original Petition to Intervene; and (iii) confirm that all factual averments, legal arguments, and requests for relief set forth in the original Petition remain preserved and incorporated by reference herein.

Respectfully submitted,



—
Daniel A. Garcia (PA Attorney ID 311503)
Brian Pulito (PA Attorney ID 203952)
Sarah M. Rambin (PA Attorney ID
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Date: October 29, 2025

Counsel to Aspen Power, 38 Degrees, CVE
North America, Syncarpha Capital, LLC,
Twilight Renewables, Bollinger Solar, and
CEP Renewables, LLC

Exhibit A

Amended Petition to Intervene

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Coalition For Affordable Utility Services	:	
and Energy Efficiency in Pennsylvania	:	R-2025-3057164
Office of Small Business Advocate	:	
Brad and Jennifer Wooley	:	C-2025-3057844
	:	C-2025-3057889
	:	C-2025-3057946
v.	:	
	:	
PPL Electric Utilities Corporation	:	

**AMENDED PETITION TO INTERVENE OF
ASPEN POWER PARTNERS LLC, 38 DEGREES NORTH, BOLLINGER SOLAR, CEP
RENEWABLES, LLC, CVE NORTH AMERICA, EDPR NA DISTRIBUTED
GENERATION LLC, GS POWER PARTNERS, PROSPECT14 LLC, RADIAL POWER
LLC, SCALE MICROGRIDS, SOLAR RENEWABLE ENERGY, LLC, SR1 CAPTURA
SAGE HOLDCO I, LLC, SYNCARPHA CAPITAL, LLC, AND TWILIGHT
RENEWABLES**

Pursuant to 52 Pa. Code §§ 1.81, and 5.71–5.75 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) Regulations, Aspen Power Partners LLC, 38 Degrees North, Bollinger Solar, CEP Renewables, LLC, CVE North America, EDPR NA Distributed Generation LLC, GS Power Partners, Prospect14 LLC, Radial Power LLC, Scale Microgrids, Solar Renewable Energy, LLC, SR1 Captura Sage Holdco I, LLC, Syncarpha Capital, LLC, and Twilight Renewables, collectively as the Customer-Generator Coalition (“CGC” or “Coalition”), by and through its undersigned counsel, Steptoe & Johnson PLLC, respectfully submits this Amended Petition to Intervene in the above-captioned proceeding initiated by PPL Electric Utilities Corporation (“PPL” or “the Company”).

This amendment updates the membership of the Coalition to (1) include additional entities with a direct and substantial interest in the outcome of this proceeding, and (2) update the names of existing Coalition members to reflect their official corporate designations. This amendment is intended solely to ensure administrative accuracy and completeness of the record and is not intended to supersede or replace the Coalition’s original Petition to Intervene. All prior averments, arguments, and requests for relief set forth therein are hereby preserved and incorporated by reference as though fully set forth at length herein. The Coalition’s legal position and requested relief remain unchanged from its original Petition to Intervene, filed October 15, 2025.

I. BACKGROUND

1. On September 30, 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”).

2. On October 15, 2025, the Coalition filed its Petition to Intervene in this docket. The Petition was accepted and the Coalition was granted party status in the proceeding.

3. By Order entered October 24, 2025, the Commission suspended PPL’s proposed Tariff Electric Pa. P.U.C. Nos. 202 and 2S pursuant to 66 Pa.C.S. § 1308(d) and referred the matter to the Office of Administrative Law Judge (“OALJ”) for hearings and a Recommended Decision.

4. Since the filing of the original Petition, several additional renewable-energy developers and customer-generators have requested to join the Coalition, recognizing that the issues raised in this proceeding, specifically, PPL’s proposed Maximum Registered Peak Load

(MRPL) reclassification and Alternative Energy Credit (AEC) ownership provisions, directly affect their projects, financial interests, and interconnection rights.

5. The inclusion of these new members will ensure that the record before the Commission accurately reflects the full range of interests impacted by PPL's proposals.

II. PROPOSED INTERVENORS

3. CGC is an *ad hoc* group of various customer-generators engaged in the development, ownership, and operation of solar photovoltaic power generation throughout the Commonwealth, including within PPL's service territory.

4. Each member of the Coalition owns, operates, or develops renewable-energy generation facilities within PPL's service territory that either:

- (a) are interconnected under the Commission's Alternative Energy Portfolio Standards ("AEPS") Regulations, 52 Pa. Code §§ 75.21 - 75.51, or
- (b) are actively pursuing interconnection under PPL's tariff.

5. The attorneys for Customer-Generators Coalition in this matter are:

Daniel A. Garcia (PA Attorney ID 311503)
Brian Pulito (PA Attorney ID 203952)
Sarah M. Rambin (PA Attorney ID 313717)
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Counsel consents to electronic service pursuant to 52 Pa. Code § 1.54(b)(3).

6. The following entities are hereby added as members of the Customer-Generator Coalition and join in all representations and requests for relief set forth in the original Petition to Intervene:

- EDPR NA Distributed Generation LLC
- GS Power Partners
- Prospect14 LLC
- Radial Power LLC
- Solar Renewable Energy, LLC
- SR1 Captura Sage Holdco I, LLC
- Scale Microgrids

7. The Coalition further seeks leave under 52 Pa. Code § 5.91 to update the official names of certain existing intervenors as reflected in Appendix A. These revisions are clerical in nature and are intended solely to ensure the accuracy of the record by conforming the listed parties' names to their current and correct legal entities as registered with the appropriate state authorities.

8. A complete and current list of all participating Coalition members is attached as Appendix A to this Amended Petition.

III. LEGAL STANDARD

8. Under 52 Pa. Code § 1.81, the Commission or the Presiding Officer may grant leave to amend a pleading at any time to ensure a complete and accurate record. The Commission routinely allows amendments that do not alter the substantive issues or prejudice other parties. See also 52 Pa. Code § 5.91.

9. Section 5.72(a) provides that a person may intervene if that person “has an interest which may be directly affected and which is not adequately represented by existing participants.”

The additional members identified herein plainly meet this standard.

10. This amendment does not expand the scope of the Coalition’s participation, introduce new issues, or modify the relief requested. Rather, it consolidates representation of affected stakeholders under one coordinated party, promoting administrative efficiency and avoiding duplicative filings.

11. Granting this amendment will ensure a full and fair record on the implications of PPL’s proposed MRPL and AEC tariff provisions while maintaining procedural economy.

WHEREFORE, Aspen Power Partners LLC, 38 Degrees North, Bollinger Solar, CEP Renewables, LLC, CVE North America, EDPR NA Distributed Generation LLC, GS Power Partners, Prospect14 LLC, Radial Power LLC, Scale Microgrids, Solar Renewable Energy, LLC, SR1 Captura Sage Holdco I, LLC, Syncarpha Capital, LLC, and Twilight Renewables, respectfully request that the Pennsylvania Public Utility Commission (i) grant its Amended Petition to Intervene; (ii) accept the additional entities identified in Section II, above, and (iii) grant any other relief as it deems necessary.

Respectfully submitted,



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Date: October 29, 2025

Counsel to Aspen Power Partners LLC,
38 Degrees North, Bollinger Solar, CEP
Renewables, LLC, CVE North America,
EDPR NA Distributed Generation LLC,
GS Power Partners, Prospect14 LLC,
Radial Power LLC, Scale Microgrids,
Solar Renewable Energy, LLC, SR1
Captura Sage Holdco I, LLC, Syncarpha
Capital, LLC, and Twilight Renewables

APPENDIX A – CUSTOMER-GENERATOR COALITION MEMBERSHIP LIST

Entity Name
38 Degrees North
Aspen Power Partners LLC
Bollinger Solar
CEP Renewables,LLC
CVE North America
EDPR NA Distributed Generation LLC
GS Power Partners
Prospect14 LLC
Radial Power LLC
Scale Microgrids
Solar Renewable Energy, LLC
SR1 Captura Sage Holdco I, LLC
Syncarpha Capital, LLC
Twilight Renewables

VERIFICATION

I, DANIEL GARCIA, hereby state that the facts above set forth are true and correct (or 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).

Dated: October 29, 2025



Daniel A. Garcia