



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

October 31, 2025

Via Electronic Filing

Matthew L. Homsher, Secretary
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
I&E Prehearing Memorandum

Dear Secretary Homsher:

Enclosed for electronic filing is the Bureau of Investigation and Enforcement's ("I&E") Prehearing Memorandum in the above-referenced matter.

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Michael Podskoch".

Michael A. Podskoch, Jr.
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 330132
(717) 783-6151
mpodskoch@pa.gov

MAP/nb
Enclosures

cc: Deputy Chief Administrative Law Judge Christopher P. Pell (*via email*)
Administrative Law Judge Barbara Shadie-Nause (*via email*)
Per Certificate of Service

I. INTRODUCTION

On September 30, 2025, PPL Electric Utilities Corporation (“PPL Electric” or “Company”) filed proposed Original Tariff Electric – Pa. P.U.C. No. 202 and Original Tariff Electric – Pa. P.U.C. No. 2S with a proposed effective date of December 1, 2025. The rates set forth therein, if approved by the Commission, would increase PPL Electric’s annual jurisdictional revenues by \$356.3 million, or 33.4%.

On October 2, 2025, the Office of Small Business Advocate (“OSBA”) filed its Notice of Appearance. On October 6, 2025, the Commission on Economic Opportunity (“CEO”) filed a Petition to Intervene. That same day, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) filed a Formal Complaint. On October 9, 2025, OSBA filed a Formal Complaint and Public Statement. That same day, I&E filed its Notice of Appearance. On October 16, 2025, CAUSE-PA filed its Notice of Appearance. That same day, 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”) filed a Petition to Intervene. On October 23, 2025, the Office of Consumer Advocate (“OCA”) filed its Notice of Appearance and a Formal Complaint and Public Statement.

On October 23, 2025, the Commission entered an Order pursuant to Section 1308(d) of the Public Utility Code suspending the implementation of the proposed rates by operation of law until July 1, 2026, and opening an investigation into the lawfulness, justness, and reasonableness of the proposed rates, rules, and regulations contained therein. The case was assigned to the Office of Administrative Law Judge for the prompt

scheduling of such hearings as may be necessary culminating in the issuance of a Recommended Decision.

On October 27, 2025, the Solar Energy Industries Association (“SEIA”) and the Coalition for Community Solar Access (“CCSA”) (collectively the “Joint Solar Advocates”) filed a Petition to Intervene. October 28, 2025, the Energy Justice Advocates (“EJA”) filed a Petition to Intervene and Protest. That same day, Dimension PA 1 LLC filed a Petition to Intervene. On October 29, 2025, the Environmental Defense Fund (“EDF”), Natural Resources Defense Council (“NRDC”), and Citizens for Pennsylvania’s Future (“PennFuture”) (collectively the “Environmental Petitioners”) filed a Petition to Intervene. That same day, CGC filed a Motion to Amend and Amended Petition to Intervene seeking to add the following entities as members to CGC: EDPR NA Distributed Generation LLC, GS Power Partners, Prospect14 LLC, Radial Power LLC, Solar Renewable Energy, LLC, SR1 Captura Sage Holdco I, LLC, and Scale Microgrids.

Pursuant to the Prehearing Conference Order issued on October 23, 2025, a telephonic Prehearing Conference is scheduled on November 5, 2025 at 9:00 a.m. before Deputy Chief Administrative Law Judge Christopher P. Pell and Administrative Law Judge Barbara Shadie-Nause.

II. ISSUES

The following list represents I&E's preliminary determination of the potential issues in this proceeding:

1. Storm Management Expenses
2. Vegetation Management Expenses
3. Rate Case Expense
4. EV Charging Proposal
5. PUC Assessment Factors
6. Competitive Enhancement Rider
7. Community Service Projects
8. Membership Dues
9. Cost of Equity
10. Cost of Debt
11. Capital Structure
12. Overall Rate of Return
13. Proxy Group
14. Risk Analysis
15. Salaries and Wages
16. Incentive Compensation
17. Taxes Other than Income
18. Pension Expense
19. Other Post Retirement Benefits
20. Advertising Expense
21. Universal Service Rider
22. Infrastructure Investment and Jobs Act (IIJA)
23. Payment Transaction Fees
24. Employee Activity Costs
25. Lobbying Expenses
26. Economic Development
27. Company Use Generation Supply Purchases
28. IT Upgrades
29. Cash Working Capital
30. Rate Base
31. Cost of Service Study
32. Rate Design
33. Proposed Rate Revenue
34. Scale back of Rates

The listing is as complete as can be made at this time. I&E specifically reserves the right to address other issues as it deems appropriate if any such relevant issues arise.

III. WITNESSES

It is currently expected that I&E may call the following expert witnesses without being limited thereto:

1. Zachari Walker, Fixed Utility Financial Analyst
2. Drew Breuning, Fixed Utility Financial Analyst
3. Christopher Keller, Fixed Utility Financial Analyst
4. Ethan H. Cline, Fixed Utility Valuation Engineer
5. Benedict Tarr, Fixed Utility Valuation Engineer
6. Don Trumpie, Fixed Utility Valuation Engineer

The I&E witnesses may be contacted through the information listed above for Mr. Williams and Mr. Podskoch. The witness list is provided without the benefit of complete discovery or analysis of the positions of the other parties to this proceeding. Accordingly, I&E reserves the right to call additional witnesses or withdraw the name of the witnesses listed above.

IV. EVIDENCE

I&E expects to present all written direct, rebuttal, and surrebuttal testimony and accompanying exhibits at the evidentiary hearings. Moreover, I&E intends to rely on the Company's filing, supplemental testimony, answers to data requests and interrogatories, annual reports and other documents submitted to the Commission, other relevant Commission filings, any other relevant Commonwealth agency letters or reports, general financial market information sources, and other public documents and reports. However, there may be issues of law or Commission policy that are not properly the subject of testimony or factual issues that are clear on the record and need not be supported by testimony. I&E thereby reserves the right to dispense with testimony when, in its opinion, an issue can be adequately addressed through briefing.

V. DISCOVERY

Discovery in this matter has begun and is ongoing. I&E supports the discovery modifications as proposed by OCA.

VI. SCHEDULE

As of this date, the parties have not yet finalized a litigation schedule.

I&E supports the following schedule as proposed by CAUSE-PA:

Non-Company Direct Testimony	December 22, 2025
Rebuttal Testimony	January 23, 2026
Surrebuttal Testimony	February 9, 2026
Rejoinder	February 13, 2026
Hearings	Week of February 16, 2026
Main Briefs	March 10, 2026
Reply Briefs	March 20, 2026

I&E proposes that the evidentiary hearings be held in Harrisburg in order to save the Commission the expense of sending the I&E prosecutors and witnesses to out-of-town hearings.

VII. PUBLIC INPUT HEARINGS

I&E proposes the use of telephonic public input hearings to encourage increased participation by ratepayers.

VIII. SERVICE OF DOCUMENTS

I&E requests that all documents in this proceeding be served on:

Adam J. Williams, Esq.
Michael A. Podskoch, Jr., Esq.
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
adawilliam@pa.gov
mpodskoch@pa.gov

For purposes of satisfying in-hand requirements for discovery responses, prepared testimony, briefs, and other documents during this proceeding, and consistent with Commission regulations and policy, I&E proposes to both only serve and accept electronic delivery of documents.

IX. SETTLEMENT

I&E will maintain an open dialogue and is willing to make good faith efforts to successfully resolve this matter through settlement. In the event settlement discussions fail to result in a full and complete resolution of the matter, I&E is prepared to fully or partially litigate this proceeding.

Respectfully submitted,



Michael A. Podskoch, Jr.
Prosecutor
PA Attorney ID No. 330132

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Dated: October 31, 2025

Ria M. Pereira, Esq.
Elizabeth R. Marx, Esq.
John W. Sweet, Esq.
Lauren N. Berman, Esq.
Levi A. Phillips, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org

Joseph L. Vullo, Esq.
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com

Devin McDougall, Esq.
Logan Welde, Esq.
Lauren Otero, Esq.
Earthjustice
1617 John F. Kennedy Boulevard
Suite 2020
Philadelphia, PA 19103
dmcougall@earthjustice.org
lwelde@cleanair.org
lotero@cleanair.org

Michael Zimmerman, Esq.
Environmental Defense Fund
257 Park Ave. S.
New York, NY 10010
mzimmerman@edf.org

Alan M. Seltzer, Esq.
John F. Povilaitis, Esq.
Buchanan Ingersoll & Rooney PC
409 N. Second Street, Suite 500
Harrisburg, PA 17101
alan.seltzer@bipc.com
john.povilaitis@bipc.com

Daniel A. Garcia, Esq.
Sarah M. Rambin, Esq.
Steptoe and Johnson, PLLC
1 PPG Place, Suite 3300
Pittsburgh, PA 15222
Daniel.Garcia@Steptoe-Johnson.com
Sarah.Rambin@Steptoe-Johnson.com

Brian J. Pulito, Esq.
Steptoe and Johnson, PLLC
201 Chestnut Street
Suite 200
Meadville, PA 16335
Brian.Pulito@Steptoe-Johnson.com

Emma H. Bast, Esq.
Jessica R. O'Neill, Esq.
Citizens for Pennsylvania's Future
1429 Walnut Street
Suite 701
Philadelphia, PA 19102
bast@pennfuture.org
oneill@pennfuture.org



Michael A. Podskoch, Jr.
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 330132
(717) 783-6151
mpodskoch@pa.gov