



October 31, 2025

Via E-Mail Only

The Honorable Christopher P. Pell
Deputy Chief Administrative Law Judge
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
cpell@pa.gov

The Honorable Barbara Shadie Nause
Administrative Law Judge
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
bshadienau@pa.gov

Re: Pa. PUC v. PPL Electric Utilities Corporation, Docket Nos. R-2025-3057164; C-2025-3057844; et al.

Prehearing Memorandum of CAUSE-PA

Your Honor:

Please find the attached **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in the above-noted proceeding.

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

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ria M. Pereira".

Ria M. Pereira, Esq.
Counsel for CAUSE-PA

CC: Secretary Matthew L. Homsher (via E-file)
Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission : Docket Nos. R-2025-3057164;
 : C-2025-3057844;
 v. : et al.
 :
 PPL Electric Utilities Corporation :

**PREHEARING MEMORANDUM
OF THE COALITION FOR AFFORDABLE UTILITY SERVICES
AND ENERGY EFFICIENCY IN PENNSYLVANIA**

PENNSYLVANIA UTILITY LAW PROJECT
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On October 23, 2025, a Prehearing Conference Order (October 23rd Order) was issued by the Honorable Deputy Chief Administrative Law Judge Christopher P. Pell and Honorable Administrative Law Judge Barbara Shadie Nause (ALJs). The October 23rd Order set a telephonic prehearing conference for Wednesday, November 5, 2025, at 9:00 a.m., and requires parties to file a Prehearing Memorandum no later than Friday, October 31, 2025. In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Memorandum.

As discussed below, CAUSE-PA requests that its Formal Complaint at Docket No. C-2025-3057844 be consolidated with the rate case docket at Docket No. R-2025-3057164.

I. Background

On September 30, 2025, PPL Electric Utilities Corporation (PPL) submitted a rate filing, PPL Original Tariff Electric – Pa. P.U.C. No. 202 (Tariff No. 202), seeking a general rate increase of approximately \$356 million, or 33.42%, over existing revenues. (PPL St. 1 at 8; see also Rate Filing Cover Letter).

On October 6, 2025, CAUSE-PA filed a Formal Complaint in the above-captioned proceeding, at Docket No. R-2025-3057164, which was docketed at Docket No. C-2025-3057844. No answer was filed by PPL and no objection raised to CAUSE-PA's standing to fully participate in this proceeding as a Complainant and party.

II. Issues to be Presented

In addition to compliance with sound rate making principles, including the requirement that rates be just and reasonable, PPL must also ensure that its rates and tariff comply with universal service requirements. See 66 Pa. C.S. § 2804. In determining whether rates are just and

reasonable, the Commission must examine whether rates are affordable and accessible to those served.

If the Commission approves any electric distribution rate increase, the Commission should condition approval on PPL's agreement to perform such actions which are necessary to ensure compliance with applicable sections of the Public Utility Code, Commission regulations and guidelines, and settlement agreements.

CAUSE-PA has conducted an initial review of PPL's proposed tariff changes and testimony and opposes PPL's request on the grounds that the proposed rate increase and tariff changes may result in unjust and unreasonable rates that would impose severe hardship on low and moderate income residential customers. CAUSE-PA identifies the following specific issues of concern, which must be addressed in this proceeding to determine whether PPL's proposals are just, reasonable, and in the public interest::

- i. The conformity to law and the effect of PPL's rate filing and proposed rate increases on low income households.
- ii. The need for the overall revenue requirement sought and its impact on the ability of low income households to afford electric service.
- iii. The effect of PPL's proposal to increase its fixed residential customer charge for residential customers, including the effect of this proposed increase on low income households, and on the ability to achieve appreciable bill savings through adoption of energy efficiency measures.
- iv. The impact on low income customers of PPL's proposal to continue and expand its Storm Damage Expense Rider.
- v. The effect of PPL's revenue requirement allocation proposal on the ability of low income customers' ability to afford to connect to and maintain PPL electric service.

- vi. The effect of data center and other large load growth on PPL residential bills and the cost of its universal service programs and the need to recover universal service costs from customer classes other than simply residential customers.
- vii. The effects of PPL's proposed rate increase and rate proposals on low income households' access to and participation in PPL's universal service programs and the continued adequacy of those programs in ensuring that low income households can connect to and accord continued service .
- viii. The effect of PPL's proposal to allow submetering of master meter multifamily buildings on the due process rights of tenants in PPL's service territory.
- ix. The effect and impact of PPL's proposal to modify certain rate classifications for certain net metering customers and to change the definition of maximum registered peak load in its tariff.
- x. The impact that PPL's proposed electric vehicle time of use rate will have on the rates paid by other customers, as well as customers who elect to take service under that rate.
- xi. The impact of PPL's proposal to remove certain customer assistance program personnel costs from rates and collect them through its Universal Service Rider, as well as the impact of its proposal to eliminate the CAP Cost Recovery Offset.
- xii. The impact of PPL's proposal to require its ratepayers, including its low income ratepayers, to pay for community economic development projects through its proposed Opportunity Pennsylvania Program.
- xiii. The sufficiency of PPL's proposal to eliminate fees for bill payment for certain transactions and whether there remain transactions that would require PPL's low income customers to pay fees in order to pay their electric bill.
- xiv. Other issues which may arise through CAUSE-PA's review of PPL's new original tariff, its filings, discovery responses, and the testimony of the parties during the course of the proceeding.

III. Witnesses and Testimony

CAUSE-PA intends to present the following witnesses to testify in this matter, but reserves the right to call additional or substitute witnesses as may be warranted upon proper notice to Your Honors and the parties:

Patrick M. Cicero
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bhavumaki@synapse-energy.com

Mr. Cicero and Mr. Havumaki will address the issues identified above, as well as other issues that may arise throughout this proceeding.

IV. Discovery

CAUSE-PA is involved in discussions with the parties regarding mutually agreeable modifications related to discovery in this proceeding. CAUSE-PA supports the discovery modifications proposed by the Office of Consumer Advocates (OCA) in this matter.

In addition, CAUSE-PA requests that any approved discovery modifications in this matter be considered effective as of the date of the prehearing conference, as opposed to the date of a subsequent Prehearing Order.

V. Public Input Hearings

CAUSE-PA supports the scheduling of public input hearings in this matter. CAUSE-PA recommends that the Commission consider the use of telephonic and in-person public input hearings to encourage participation by the ratepayers.

VI. Settlement

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourages the parties to engage in settlement discussions early in the process.

VII. Service on CAUSE-PA

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. All documents should be served on CAUSE-PA as follows:

Ria M. Pereira, Esq.
Elizabeth R. Marx, Esq.
John W. Sweet, Esq.
Levi A. Phillips, Esq.
Lauren N. Berman, Esq.
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CAUSE-PA requests that parties agree to electronic service in this proceeding.

VIII. Representation of CAUSE-PA at Prehearing Conference

At the Prehearing Conference, CAUSE-PA will be represented by Ria M. Pereira, Esq.

IX. Litigation Schedule

CAUSE-PA is currently involved in discussions with the parties to reach a mutually agreeable litigation schedule. In the absence of a mutually agreed upon schedule between parties, CAUSE-PA proposes the following procedural schedule:

Event	Date	
Direct	Monday, December 22, 2025	
Rebuttal	Friday, January 23, 2026	
Surrebuttal	Monday, February 9, 2026	
Written/Oral Rejoinder	Friday, February 13, 2026	
Hearings	Week of February 17, 2026	2-4 days for evidentiary hearing ¹
Main Brief	Tuesday, March 10 2026	
Reply Brief	Friday, March 20, 2026	
Last Public Meeting Date	Thursday, June 18, 2026	
End of Suspension Date:	Wednesday, July 1, 2026	

WHEREFORE, CAUSE-PA respectfully submits this Prehearing Memorandum.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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Elizabeth R. Marx, Esq., PA ID: 309014
John W. Sweet, Esq., PA ID: 320182
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¹ The number of evidentiary hearing dates may be subject to the close of the record. The Prehearing Order indicates a current close of record date of February 18, 2026.

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 : C-2025-3057844;
 v. : et al.
 :
 PPL Electric Utilities Corporation :

Certificate of Service

I hereby certify that I have this day served copies of the **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email

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