

COMMONWEALTH OF PENNSYLVANIA



DARRYL A. LAWRENCE
Interim Acting Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
(800) 684-6560

 @pa_oca
 /pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

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 Nos. R-2025-3057164

Dear Secretary Homsher:

Attached for electronic filing please find the Office of Consumer Advocate's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Christy M. Appleby
Christy M. Appleby, Esq.
Senior Assistant Consumer Advocate
PA Attorney I.D. # 85824
Cappleby@paoca.org

Enclosures

cc: The Honorable Chrisitopher P. Pell (email only: cpell@pa.gov)
The Honorable Barbara Shadie Nause (email only: bshadienau@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

| | | |
|--|---|---------------------------|
| Pennsylvania Public Utility Commission | : | |
| | : | |
| v. | : | Docket No. R-2025-3057164 |
| | : | |
| PPL Electric utilities Corporation | : | |
| | : | |

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s Prehearing Conference Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 31st day of October 2025.

SERVICE BY E-MAIL ONLY

Michael A. Podskoch, Esq.
Adam J. Williams, Esq.
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265
mpodskoch@pa.gov
adawilliam@pa.gov
Counsel for I&E

Rebecca Lyttle, Esq.
Steven C. Gray, Esq.
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st floor
Harrisburg, Pennsylvania 17101
relyttle@pa.gov
sgray@pa.gov
Counsel for OSBA

Kimberly A. Klock, Esq.
Michael J. Shafer, Esq.
PPL Services Corporation
645 Hamilton Street, Suite 700
Allentown, PA 18104
kklock@pplweb.com
mjshafer@pplweb.com
Company

Devin T. Ryan, Esq.
Alice A. Wade, Esq.
Hayley E. Wilburn, Esq.
Post & Schell, P.C.
One Oxford Centre
301 Grant Street, Suite 3010
Pittsburgh, PA 15219
dryan@postschell.com
alice.wade@postschell.com
hwilburn@postschell.com
Counsel for Company

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
Counsel for CAUSE-PA

David B. MacGregor, Esq.
Garrett P. Lent, Esq.
Anthony C. DeCustatis, Esq.
Erin R. Kawa, Esq.
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101
dmacgregor@postschell.com
glent@postschell.com
adecusatis@postschell.com
ekawa@postschell.com
Counsel for Company

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
Counsel for Joint Solar Advocates

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112
epstein@efmr.org

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
Counsel for EDR, NRDC, and PennFuture

Joseph L. Vullo, Esq.
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
Counsel for Commission of Economic Opportunity (CEO)

Daniel A. Garcia, Esq.
Brian Pulito, Esq.
Sarah M. Rambin, Esq.
Steptoe and Johnson, PLLC
1 PPG Place, Suite 3300
Pittsburgh, PA 15222
Daniel.Garcia@Steptoe-Johnson.com
Brian.Pulito@Steptoe-Johnson.com
Sarah.Rambin@Steptoe-Johnson.com
Counsel for Customer-Generation Coalition (CGC)

Devin McDougall, Esq.
Logan Welde, Esq.
Lauren Otero, Esq.
Clean Energy Program
Earthjustice
1617 John F. Kennedy Blvd., Suite 2020
Philadelphia, PA 19103
dmcdougall@earthjustice.org
lwelde@cleanair.org
lotero@cleanair.org
Counsel for Energy Justice Advocates

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

Daniel B. Markind, Esq.
Flaster Greenberg, PC
1717 Arch Street, Suite 3300
Philadelphia, PA 19103
Daniel.markind@flastergreenberg.com
Counsel for Dimension PA I LLC

/s/ Christy M. Appleby
Christy M. Appleby
Senior Assistant Consumer Advocate
PA Attorney I.D. # 85824
CAppleby@paoca.org

Harrison W. Breitman
Assistant Consumer Advocate
PA Attorney I.D. # 320580
HBreitman@paoca.org

Jacob D. Guthrie
Assistant Consumer Advocate
PA Attorney I.D. # 334367
JGuthrie@paoca.org

Josiah B. Harmar
Assistant Consumer Advocate
PA Attorney I.D. # 338426
JHarmar@paoca.org

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: 717-783-5048
Fax: 717-783-7152

Johnathan M. Longhurst
Assistant Consumer Advocate
PA Attorney I.D. #338157
JLonghurst@paoca.org

OCA25PPLBRC@paoca.org

Dated: October 31, 2025

Counsel for:
Darryl A. Lawrence
Consumer Advocate

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

| | | | |
|--|---|-------------|----------------|
| Pennsylvania Public Utility Commission | : | | |
| | : | Docket Nos. | R-2025-3057164 |
| v. | : | | C-2025-3057844 |
| | : | | C-2025-3057889 |
| PPL Electric Utilities Corporation | : | | C-2025-3057946 |

PREHEARING CONFERENCE MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to the Prehearing Conference Order issued on October 23, 2025, in the above-captioned proceeding, by the Honorable Administrative Law Judges (ALJs) Christopher P. Pell and Barbara Shadie Nause, of the Office of Administrative Law Judge (OALJ) of the Pennsylvania Public Utility Commission (Commission), and pursuant to Section 333 of the Public Utility Code (Code), 66 Pa. C.S. Section 333, the Commission’s regulations at 52 Pa. Code Sections 5.221-5.224, the Pennsylvania Office of Consumer Advocate (OCA) submits the following Prehearing Conference Memorandum.

I. INTRODUCTION AND PROCEDURAL HISTORY

On September 30, 2025, PPL Electric Utilities Corporation (PPL or the Company) filed proposed Original Tariff Electric – Pa. P.U.C. No. 202 and Original Tariff Electric – Pa. P.U.C. No. 2S with the Commission. The Company proposes to increase rates to produce additional overall revenues of \$356.3 million per year, a 33.4% increase in overall distribution revenue requirement. PPL provides electric distribution service to approximately 1.49 million residential, commercial, and industrial customers in portions of 29 counties across eastern and central Pennsylvania.

Under the Company's proposal, the monthly bill for distribution charges for a residential customer using 1,000 kWh per month would increase by \$14.80, from \$65.16 to \$79.96, or by approximately 22.7%. The Company has proposed increasing the fixed, monthly residential customer charge from \$15.58 to \$17.00, or by 9%. The Company proposes a return on equity of 11.3% resulting in an overall rate of return of 8.56%, in conjunction with an equity-rich capital structure of 56% equity and 44% debt. Additionally, the filing requests approval of operational improvements regarding storm reliability, vegetation management, and infrastructure improvements. The filing also requests approval of customer service-related improvements as follows: cancelation of payment channel fees, EDI transaction fees will be recovered directly from the suppliers instead of distribution customers, large load interconnection tariff, electric vehicle rebate program, and tariff changes to classify customers based on use of the system.

On October 23, 2025, the OCA filed a Formal Complaint, Public Statement, and Notice of Appearance in this proceeding. The OCA filed to protect the interests of consumers in the Company's service territory and ensure the rates to be implemented by the Company are just and reasonable, not unduly discriminatory, and otherwise in accordance with sound ratemaking principles.

On October 6, 2025, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) filed a Formal Complaint. On October 9, 2025, the Commission's Bureau of Investigation & Enforcement (I&E) filed a Notice of Appearance. Also, on October 9, 2025, the Office of Small Business Advocate (OSBA) filed a Complaint. On October 16, 2025, Aspen Power, 38 Degrees, CVE North America, Syncarpha Capital, LLC, Twilight Renewables, Bollinger Solar, and CEP Renewables, LLC, (collectively, the Customer-Generator Coalition, CGC or the Coalition) filed a Petition to Intervene. On October 27, 2025 the Coalition for

Community Solar Access and the Solare Energy Industries Association (the “Joint Solar Advocates”) filed a Petition to Intervene. On October 28, 2025, Dimension PA 1 LLC filed its Petition to Intervene, and on October 29, 2025, a Petition to Intervene was filed by the Environmental Defense Fund, Natural Resources Defense Counsel, and Citizens for Pennsylvania’s Future.

On October 23, 2025, the Commission issued an Order that initiated an investigation into the lawfulness, justness, and reasonableness of the proposed rate increase in this filing in addition to the Company’s existing rates, rules, and regulations, assigned this matter to the OALJ for further proceedings as appropriate, and suspended the effective date of the tariff until July 1, 2026.

II. ISSUES

Based upon a preliminary analysis of the Company’s general rate increase filing, the OCA has compiled a list of issues and sub-issues which it anticipates will be included in its investigation of the Company’s rate request. It is anticipated that other issues may arise and may be pursued once the answers to all the OCA’s interrogatories have been received and analyzed. The issues and sub-issues set forth below, and others that may develop during discovery, will be analyzed and presented as appropriate by the OCA with the assistance of its expert witnesses:

A. Rate of Return

1. The OCA will perform a detailed analysis of the cost of common equity claimed by the Company as well as the overall rate of return as claimed by the Company. Also, the OCA will carefully examine the Company’s methodologies and supporting data used to develop its final cost of common equity claim.

2. The OCA will examine whether the capital structure proposed by the Company is representative of the period in which rates will be in effect and is otherwise appropriate for ratemaking purposes.

3. The OCA will examine the embedded cost of debt claimed by the Company to determine whether it is reasonable and appropriate for ratemaking purposes.

4. The OCA will examine whether any company-specific adjustments proposed by

the Company are justified.

B. Rate Base/ Measure of Value

1. The OCA will examine the reasonableness and accuracy of Company's projections related to the utility plant in service at the time relevant to this proceeding.
2. The OCA will review the Company's claim for plant additions during the FTY and FPFTY.
3. The OCA will investigate whether the Company's adjustment to rate base for depreciation reserve is appropriate.
4. The OCA will examine the Company's projections of non-investor supplied funds, including but not limited to, customer deposits, customer advances for construction, and contributions in aid of construction.
5. The OCA will examine the Company's proposal to include unamortized balances in rate base.
6. The OCA will examine the Company's claim for materials and supplies.
7. The OCA will examine the Company's calculation and amount of cash working capital.
8. The OCA will examine the reasonableness and lawfulness of rate base claims for amounts paid to affiliates, in accordance with Section 2101 of the Public Utility Code. 66 Pa. C.S. § 2101 *et seq.*
9. The OCA will examine the Company's Accumulated Deferred Income Tax (ADIT) balances and excess ADIT (EADIT) balances.
10. The OCA will examine the reasonableness of the Company's proposed Allowance for Funds Used During Construction (AFUDC) for land held for future use.

C. Revenues and Expenses

1. The OCA will examine the Company's claimed revenues and any adjustments to the level of revenues.
2. The OCA will seek to ascertain whether the Company's claimed expenses are supported, reasonable, and appropriate.
3. The OCA will examine whether the projected number of customers in the FTY and FPFTY are reasonable and accurate.
4. The OCA will examine whether the Company's claims of sales and revenues during the FTY and FPFTY are reasonable and accurate.

5. The OCA will examine whether the Company's projections of revenues in the future periods are reasonable and accurate including, but not limited to, its billed days adjustments, metered sales and the impact of conservation measures, and miscellaneous revenue adjustments.

6. The OCA will examine whether the Company's projections of number of employees, overtime, and incentive pay are reasonable and accurate.

7. The OCA will examine the costs associated with the accrual of retirement benefits other than pensions for the Company's employees or contributions to pension funds.

8. The OCA will examine the justness and reasonableness of the Company's employee healthcare expense.

9. The OCA will examine the appropriateness of the Company's pro forma claim for rate case expense.

10. The OCA will examine the reasonableness of the Company's proposed purchased power expense claims.

11. The OCA will examine the Company's request for depreciation expenses to determine whether it is just and reasonable.

12. The OCA will examine the justness and reasonableness of the Company's claim for insurance costs.

13. The OCA will examine the justness and reasonableness of the Company's proposed expense amortizations.

14. The OCA will examine the justness and reasonableness of the Company's claim for regulatory commission costs.

15. The OCA will examine the justness and reasonableness of the Company's claims for other operations and maintenance expenses.

16. The OCA will examine the justness and reasonableness of the Company's claims for service company expenses, including the allocated expenses of affiliated interests.

17. The OCA will examine the justness and reasonableness of the Company's claimed rate case normalization period.

18. The OCA will examine any cost savings identified in the most recent Management and Operations Audit should be reflected, if relevant, which was conducted since the Company's prior general rate increase request was filed.

19. The OCA will examine the justness and reasonableness of the Company's claimed uncollectibles expense.

20. The OCA will examine the Company's claimed revenues and any adjustments to the level of revenues.

D. Taxes

1. The OCA will examine issues related to the calculation of taxes including, but not limited to, calculation of federal and state income taxes and the amount of those taxes included as expenses for ratemaking purposes and will examine whether the Company is in compliance including with Act 40 of 2016 (66 Pa. C.S. § 1301.1).

2. The OCA will examine the reasonableness of the Company's proposal regarding the tax repairs deductions, and its claims for income taxes, property taxes, and general assessments.

3. The OCA will examine the effect of the Tax Cuts and Jobs Act on the Company's tax expense and its ADIT accounts and the amount, if any, that needs to be returned to ratepayers as a result.

4. The OCA will examine the Company's level of PURTA and property tax expense.

E. Rate Structure/ Cost of Service / Rate Design/ Tariffs

1. The OCA will examine the reasonableness of Company's proposed distribution or allocation of the revenue increase among customer classes to determine whether the proposal meets all legal requirements and sound ratemaking principles.

2. The OCA will examine Company's cost of service studies, including the methodology used and the reasonableness of the allocations.

3. The OCA will examine the reasonableness and appropriateness of the Company's proposed tariff changes, including all proposed surcharges.

4. The OCA will examine all other cost allocation and rate design proposals.

F. Depreciation

1. The OCA will examine the Company's claim for depreciation expense and depreciation study, including the depreciation method, procedure, technique, service lives, net salvage rates, and depreciation rate calculations, to determine if they are reasonable and result in just and reasonable rates.

2. The OCA will analyze the depreciation rates based upon the actuarial analysis to determine if any modifications are necessary.

G. Low-Income Programs

1. The OCA will analyze current and proposed Company operations, practices, procedures and outreach related to serving low-income customers.

2. The OCA will assess the impact of the Company's proposed rate increase on universal service, including the overall costs of customer assistance programs as affected by the Company's rate design.

3. The OCA will examine how Company's proposed rate increase, rate structure and new surcharges will affect low-income and/or low-usage customers.

4. The OCA will review the Company's current bill discount programs, arrearage management programs, or lack thereof, and proposed changes to the programs.

5. The OCA will review the Company's affordability analysis.

6. The OCA will investigate the cost recovery for universal service programs.

7. The OCA will examine the Company's proposal to eliminate the universal service cost offset in base rates.

8. The OCA will also review the current allocation of universal service costs only to residential customers and investigate whether costs should be recovered across all customer classes.

H. Quality of Service

1. The OCA will review the Company's quality of service to ensure that it is providing safe, adequate, and reliable service that is consistent with the requirements of Section 1501 of the Public Utility Code.

2. The OCA will investigate the quality of service complaints by the Company's customers.

I. Customer Service

1. The OCA will review the Company's consumer protection policies and programs to ensure compliance with Chapter 56 of the Commission's regulations.

2. The OCA will examine the Company's customer service, including performance trends, internal training, management oversight, policies, and programs.

3. The OCA will examine the Company's consumer education programs, particularly with regard to changes in billing and collection rights and remedies, and complaint processes.

4. The OCA will examine the Company's compliance and reporting as required in the last rate case concerning service and service quality.

5. The OCA will examine the Company's response to the most recent Commission Management Audit.

J. Reliability

1. The OCA will examine the reliability and integrity of the Company's systems.
2. The OCA will perform a detailed analysis of the proposed addition to vegetation management.
3. The OCA will analyze the Company's proposed steps to increase reliability within its service territory including the proposal to increase its vegetation management expense. PPL requests \$50 million for vegetation management in its FPFTY, up from \$35.6 million in the history test year. PPL proposes that this allows for a more frequent cycle of vegetation inspection and maintenance.
4. The OCA will also analyze PPL's requests for additional rights-of-way (ROWs) to allow the Company to perform vegetation management beyond the existing ROW. The Company proposes to include \$25 million in its capital budget to acquire additional ROW rights and "to record these new easement rights in public land records to preserve them in perpetuity." PPL St. 17 at 15. The OCA will investigate PPL's requests additional ROW rights.

K. Large Load/Data Centers

1. Data centers and other large load customers are increasing in Pennsylvania, especially in PPL's service territory. The current pipeline of new projects in PPL's service territory exceeds the Company's current peak load of 7.8 GW. Because the costs of transmission to interconnect these new large load customers can be put into rate base and passed onto customers, PPL claims that it is "mindful not to create stranded asset risks for other customers." PPL St. 16 at 16. The OCA will carefully review the Company's proposals regarding the impact of large load and data centers on ratepayers.

2. PPL proposes tariff changes to address large loads associated with commercial data centers. PPL's current Electric Service Agreements (ESAs) include "minimum load guarantees (80% of contracted load until service commitment is satisfied), load ramp schedules, and security instruments to ensure that the customer pays enough to cover the cost of rate-based investments. PPL St. 16 at 16. PPL seeks to replace the existing ESA process, by memorializing its large load interconnection terms in Rate Schedule LP-5. PPL St. 16 at 16. This rate structure would require new large load customers to provide financial security in an amount equal to the costs that the new large load would add to rates. *Id.* at 19. If the new customer ceases operations or otherwise terminates the arrangement before paying PPL an amount of revenue equal to the costs that the large load added to the rate base, PPL would apply the security funds to reduce its plant-in-service amount, to reduce the amounts recoverable in rates. *Id.* The OCA will review the Company's proposal, tariff language, and impact of the proposal on ratepayers.

3. PPL requests to classify customers on the Generation Supply Charge (GSC) into Rate GSC-1 (Small Commercial and Industrial (C&I)) and GSC-2 (Large C&I), based on their maximum registered peak load and PPL's revised definition of maximum registered peak load in the proposed tariff. PPL St. 15 at 2. This proposal would affect customer generators by measuring their peak electricity both by amounts *used by* the customer and *sent onto* the distribution system by the customer. Certain customer generator installations use minimal energy from PPL's system

while generating energy that they put into PPL's system. Because these installations currently count as small based only on the amount of energy that they receive from PPL's distribution system, based on a 100 kW peak demand threshold, the Small C&I customer class bears the costs of these projects. However, based on the amount of power they send onto PPL's system, the projects should be classified as Large C&I. Without this change, large customer generators are unfairly benefiting by only being measured by receiving power from PPL's distribution system while only being charged a small fraction of its demand requirements. PPL proposes that net metering installations should be reclassified as large, based on the revised maximum registered peak load definition. PPL St. 15 at 3-9. The OCA will review the Company's proposal.

L. Electric Vehicle (EV) Time-of-Use (TOU) Charging Rebate Program

1. PPL proposes to implement an EV TOU charging rebate program. Under the Company's proposal, EV TOU charging through the program would give customers a flat \$10 rebate per billing period for charging at least 80% during off-peak hours (hours when customer electricity demand on the grid is not at its highest). PPL St. 20 at 5. All registered EV owners in PPL's service territory would be eligible, with participation capped at 2,000 customers. *Id.*

2. PPL also plans to use EV charging data for infrastructure analysis and planning purposes. *Id.* at 7. PPL claims that by encouraging some EV-owning customers to charge during off-peak hours through the pilot program, the system's peak demand would decrease, which requires fewer infrastructure upgrades in the future and somewhat decrease costs for consumers. *Id.* at 6.

3. The OCA will review and investigate PPL's proposed EV TOU charging rebate program and its design, the impact on residential customers of the proposed program design, and review the proposed education for customers.

M. Other Issues

1. The OCA will examine any relevant issues that arise as a result of the Company's operations.

2. The OCA will investigate to ensure that the Company is complying with all prior orders.

3. The OCA reserves the right to examine other issues affecting the Company's revenue requirements, rates, charges, and other tariff provisions as they are identified through discovery.

III. WITNESSES

The OCA intends to present the direct, rebuttal, and surrebuttal testimonies, as may be necessary, of the below witnesses. Each witness will present testimony in written form and will

attach various exhibits, documents, and explanatory information, as may be necessary. To expedite the resolution of this proceeding, the OCA requests that copies of all interrogatories, testimony, and answers to interrogatories be mailed and/or emailed directly to the OCA's group email formed particularly for this proceeding.

Accounting / Regulatory Policy

Lafayette Morgan
10480 Little Patuxent Parkway
Suite 300
Columbia, Maryland 21044
OCA25PPLBRC@paoca.org

Reliability Issues

Rao Konidena
2309 Auerbach Street
Roseville, MN 55113
OCA25PPLBRC@paoca.org

Cost of Service / Rate Structure / Rate Design

Clarence Johnson
3707 Robinson Avenue
Austin, TX 78722
OCA25PPLBRC@paoca.org

Rate of Return / Depreciation

David Garrett
4028 Oakdale Farm Circle
Edmond, OK 73013
OCA25PPLBRC@paoca.org

Affordability of Service / Low-Income
Customers Assistance Programs

Roger Colton
34 Warwick Road
Belmont, MA 02478-2841
OCA25PPLBRC@paoca.org

Customer Service / Tariff / Quality of Service /
EV Rates

Barbara R. Alexander
44 Beech St.
Hallowell, ME 04347
OCA25PPLBRC@paoca.org

Data Centers and Large Loads

Frank Felder
1855 Saint Francis Street, Apt. 1612
Reston, VA 20190
OCA25PPLBRC@paoca.org

Tariff/Public Input Hearing Testimony

LeeAnn Wise
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA. 17101
OCA25PPLBRC@paoca.org

Distributed Energy/Net Metering Issues

Zachary F. Teti
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA. 17101
OCA25PPLBRC@paoca.org

EV Rates / Design

Matthew Hoyt
10480 Little Patuxent Parkway
Suite 300
Columbia, Maryland 21044
OCA25PPLBRC@paoca.org

The OCA specifically reserves the right to call additional witnesses, as necessary, and retains the flexibility to have the witnesses above address other areas of this case as the case proceeds. If the OCA determines that additional witnesses will be necessary for any portion of its case, it will notify all parties of record immediately.

IV. PROPOSED SCHEDULE

The OCA continues to work with the Company and the parties on a procedural schedule that is a reasonable compromise of the parties’ competing interests within the time afforded for litigation of this matter. The OCA proposes the following schedule:

| | |
|--|---|
| Public Input Hearings | Week of December 1st |
| Other Parties’ Direct Testimony | Monday, December 22, 2025 |
| Other Parties’ Supplemental Direct Testimony Regarding Public Input Hearings | May be needed depending on timing of public input hearings and other party direct testimony. If public input hearings are held after the week |

| | |
|--|---|
| | of December 17th, the OCA requests that Supplemental Direct be due 10 days after the last scheduled public input hearing or at the date of Rebuttal Testimony, whichever is sooner. |
| Rebuttal Testimony (all parties and all issues) | Friday, January 23, 2026 |
| Surrebuttal Testimony (all parties and all issues) | Monday, February 9, 2026 |
| Written Rejoinder Outline | Friday, February 13, 2026 |
| Evidentiary Hearings | Week of February 17, 2026 |
| Main Briefs | Tuesday, March 10 2026 |
| Reply Briefs | Friday, March 20, 2026 |

The OCA requests that the dates included in any litigation schedule in this matter be considered “in-hand” dates and that electronic service on the due date will satisfy the “in-hand” requirement.

V. SERVICE ON THE OCA

The OCA respectfully requests that the Presiding Officers permit electronic service without the requirement of a follow-up hard copy. The OCA will be represented in this case by the attorneys listed below.

Christy Appleby, Senior Assistant Consumer Advocate
Harrison Breitman, Assistant Consumer Advocate
Jacob Guthrie, Assistant Consumer Advocate
Johnathan Longhurst, Assistant Consumer Advocate
Josiah Harmor, Assistant Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
E-Mail: OCA25PPLBRC@paoca.org

The OCA has created a group e-mail address provided above. This is the only email address that is required for service on the OCA. The OCA's group email address will provide the emailed materials to all members of the OCA team including the expert witnesses listed above.

The OCA also requests that the ALJs instruct the parties on the record as to whether consumers who have filed formal rate complaints in this proceeding should be included on the official service lists if those complainants have not indicated either at the prehearing conference, or prior to the prehearing conference, that they wish to be active parties to this proceeding.

For the purposes of the Prehearing Conference, Christy Appleby will be the primary attorney speaking on behalf of the OCA.

VI. SETTLEMENT

The OCA will participate in settlement discussions in this matter.

VII. DISCOVERY

In conjunction with its proposed schedule, the OCA proposes the following modifications to the Commission's procedural rules regarding discovery. The OCA requests that the Presiding Officers direct that (1) the modifications will take effect when addressed during the on the record prehearing conference and apply to all future discovery requests served on and after the date of the Prehearing Conference (11/05/2025); and (2) the current eight current outstanding interrogatory sets, or requests for admissions as of the date of the Prehearing Conference (11/05/2025), that the responses be due no later than 10 calendar days after the Prehearing Conference (consistent with Paragraph A below) to the extent such responses would otherwise be due later than such date under the Commission's unmodified procedural rules for discovery (if the responses would be due sooner, then no modification is requested).

- A. Answers to written interrogatories and requests for document production, entry for inspection, or other purposes shall be served in-hand within ten (10) calendar days of service.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within three (3) calendar days of service of the interrogatories; unresolved objections shall be served in writing to the propounding party within five (5) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within five (5) business days of service of written objections.
- D. Answers to motions to dismiss objections and/or answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admissions will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) calendar days of service.
- F. Answers to on-the-record data requests shall be served in-hand within five (5) calendar days of the requests.
- G. Any discovery or discovery-related pleadings (such as objections, motions, and answers to same) served after served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day before a holiday will be deemed to have been served on the next business day for purposes of calculating the due date for any responsive filing.

After rebuttal is served, the OCA proposes that the deadlines should be reduced as follows:

- A. Answers to interrogatories and responses to requests for document production, entry for inspection, or other purposes shall be served within five (5) calendar days of service of the interrogatories or requests for production.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within two (2) calendar days of service; unresolved objections shall be served on the propounding party in writing within three (3) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of written objections.

- D. Answers to motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admission shall be deemed admitted unless answered or objected to within three (3) calendar days of service.
- F. Discovery requests and discovery related pleadings (such as objections, motions, and answers to same) served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day preceding a holiday shall be deemed to have been served on the next business day.

VIII. PREHEARING PROCEDURES

The OCA requests that the ALJs in their Prehearing Conference Order and Evidentiary Hearing Notice clarify that:

A. Evidentiary hearing exhibits need not include all pre-served testimony which is circulated to the ALJs and parties in this proceeding in accordance with the above-referenced procedural schedule. However, such pre-served testimony may be identified for movement into the record at the hearing through an inventory of pre-served testimony which is provided as a hearing exhibit.

B. Evidentiary hearing exhibits may be provided to the ALJs and parties by 10am the day before the start of evidentiary hearings with the exception of hearing exhibits related to rejoinder which may be provided by the end of the day on same day.

IX. PUBLIC INPUT HEARINGS

The OCA will be prepared to discuss public input hearings at the prehearing conference. Given the magnitude of the requested rate increase, the size of the customer base, and the requests for public input hearings and complaints received thus far in this matter, the OCA respectfully requests that six public input hearing be held, four in-person and two telephonic. There have been eight rate protests and one formal complaint filed thus far with more expected as the case proceeds. On October 24, 2025, Representative Nikki Rivera requested in-person public input hearings in or near her home district, in Lancaster County. Also, Mayor Paige Cognetti of Scranton, PA has requested in-person public input hearings in or near the city of Scranton.

The OCA also requests that the date, time, and location be placed on the hearing notice and all advertisements regarding the public input hearings. Regarding publication of the notice of public input hearings, in addition to the Company publishing the notice in a newspaper of general circulate for its service territories, the OCA respectfully requests that the Company post notice of the public input hearings on all of their social media platforms at least twice per week during each week prior to the scheduled dates of the public input hearings. Finally, the OCA requests that the Company be directed to send notice of the public input hearings via a bill insert during a billing cycle to occur shortly after this prehearing conference and prior to the scheduled dates of the public input hearings.

Attached as **Appendix A** is the OCA's proposed draft Notice for the Public Input Hearing (to be completed with details as determined by the presiding ALJs). The OCA requests the following:

A. Given the size of the customer base and service territory, a total of six (6) Public Input Hearings be held, four in-person on two separate days (with one in the afternoon and one in the evening on each day) and two telephonic (one in the afternoon and one in the evening).

B. The in-person public input hearings include a combination of daytime and evening hearings at different locations with accessible and free parking or easy access to public transportation.

C. The telephonic public input hearings include a combination of daytime and evening hearings.

D. Pre-registration be either encouraged or required for telephonic hearings only, and if required, pre-registration be required by 10:00 a.m. on the day of the telephonic Public Input Hearing at which the witness seeks to testify.

E. Hearing exhibits, such as cross examination exhibits and a list of evidence to be moved into the record (i.e., a party's list of pre-served testimony and exhibits), be required to be submitted to the ALJs by 10:00 a.m. the day before the Public Input Hearing at which the witness seeks to testify.

F. The Commission's notice of the Public Input Hearings will include the phone numbers and access codes necessary for participants to use to fully access all telephonic Public Input Hearings.

G. The Company will be required to, at a minimum, generate a notice of the Public Input Hearings that contains relevant information as to date, time, location, and phone numbers and access codes and further be required to advertise the notice: (1) in the general readership section (not legal section) of local newspapers within the service territory; (2) on its website; and (3) in social media posts which the Company utilizes to advertise generally.

H. That the other parties involved in the proceeding, including the OCA, be permitted to review these public input announcements prior to their publication and distribution and have input into which publications the ads are placed.

X. COMMON BRIEFING OUTLINE

The OCA requests that, when the ALJs issue their Instructions for Briefs, the common outline provided by the ALJs will include Roman numeral-level headers for an Overall Position on Rate Increase section following the Summary of Argument section, as well as Customer Service / Quality of Service, Customer Assistance Programs, and Tariff Issues (not otherwise briefed) sections of the brief which follow Rate Structure / Rate Design and precede the Conclusion. The OCA also recommends removing any "Fair Value" heading from the Rate Base section. The OCA's proposals for the common briefing outline are attached as Appendix B to this Prehearing Memorandum.

Respectfully submitted,

/s/ Christy Appleby

Christy Appleby

Senior Assistant Consumer Advocate

PA Bar ID # 85824

CAppleby@paoca.org

Harrison Breitman

Assistant Consumer Advocate

PA Bar ID # 320580

HBreitman@paoca.org

Jacob Guthrie

Assistant Consumer Advocate

PA Bar ID # 334367

JGuthrie@paoca.org

Office of Consumer Advocate

555 Walnut Street

5th Floor, Forum Place

Harrisburg, PA 17101-1923

(717) 783-5048

Johnathan Longhurst

Assistant Consumer Advocate

PA Bar ID # 338157

JLonghurst@paoca.org

DATED: October 31, 2025

Josiah Harmar

Assistant Consumer Advocate

PA Bar ID # 338426

JHarmar@paoca.org

Counsel for:

Darryl Lawrence

Consumer Advocate

OCA APPENDIX A
NOTICE OF IN-PERSON AND TELEPHONIC PUBLIC INPUT HEARINGS

For PPL Rate Increase Requests

Docket Nos.
R-2025-3057164

C-2025-3057844
C-2025-3057889
C-2025-3057946

The Pennsylvania Public Utility Commission (PUC) will conduct [#] Public Input Hearings concerning the general rate increase requests filed by PPL on [date], seeking to increase electric distribution rates by \$356 million per year. The in-person and telephonic hearings will be held at the following times and places:

Presiding Officers: Administrative Law Judges Christopher P. Pell and Barbara S. Nause

IN-PERSON PUBLIC INPUT HEARINGS
Pre-registration is not required.

Date: [Here]
Time: [Here]
Location: [Here]

TELEPHONIC PUBLIC INPUT HEARINGS
Pre-registration is [encouraged/required]. Read below.

Date: [Here]
Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Date: [Here]

Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Toll-free Conference Number: xxx.xxx.xxxx

PIN Number: xxxxxxxx

- You must dial the toll-free Conference number above
- You must enter the PIN number above when instructed
- You must speak your name when prompted, and press #
 - Then, the telephone system will connect you to the hearing

PRE-REGISTRATION FOR TELEPHONIC PUBLIC INPUT HEARINGS: To testify at the telephonic Public Input Hearings, pre-registration is [encouraged/required] by [day of the hearing] at 10AM. Failure to pre-register could result in you not being called to testify by the PUC judge. To pre-register to testify by telephone, please contact the PUC Judge's Legal Assistant, [name], by email at [email address] or by phone at [xxx.xxx.xxxx] and provide the requested information.

NEED ASSISTANCE WITH PRE-REGISTRATION? If you need assistance pre-registering to testify, you may have someone register for you, but they will need to provide the PUC Judge all the information listed above. Additionally, if more than one person in your household would like to testify, one person may pre-register for other individuals in the same household by providing the PUC Judge's Legal Assistant with the above-listed information for each individual.

REQUESTS FOR INTERPRETERS: If you require an interpreter, please pre-register as soon as possible. If you register too close to the hearing date, we may not have enough time to arrange for an interpreter. If you request an interpreter, the PUC will make reasonable efforts to have one present. AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

HEARING EXHIBITS: If you have any hearing exhibits to which you will refer during the hearing, please email them to the PUC Judge's Legal Assistant, [name], at [email address]. The PUC Judge will forward your exhibits to all the parties. Exhibits for the public input hearing must be received by the PUC Judge by [the day before the hearing] at 10AM.

QUESTIONS? The Pennsylvania Office of Consumer Advocate (OCA) represents the interests of utility customers before the PUC. If you have questions about the public input hearings or the Company's requested rate increase, please contact the OCA toll free at 1-800-684-6560 or by email at consumer@paoca.org. Additionally, the OCA can help customers pre-register for the Public Input Hearings.

OTHER WAYS TO BE HEARD: If you want to be heard about the proposed rate increase but do not want or cannot testify at the Public Input Hearings, you may file a formal complaint or comment to the proposed rate increase. Please visit the PUC's website to use the applicable form available at <https://www.puc.pa.gov/complaints/formal-complaints/>

OCA APPENDIX B
OCA's Proposed Common Briefing Outline
For General Rate Increase Proceeding

- I. Introduction
- II. Summary of Argument
- III. Overall Position on Rate Increase
- IV. Rate Base
 - A. Plant in Service
 - B. Depreciation Reserve
 - C. Additions to Rate Base
 - D. Deductions from Rate Base
- V. Revenues
- VI. Expenses
- VII. Taxes
- VIII. Rate of Return
- IX. Rate Structure and Rate Design
 - A. Cost of Service Study
 - B. Revenue Allocation
 - C. Rate Design / Tariff Structure
 - D. Summary and Alternatives
- X. Customer Service / Quality of Service
- XI. Customer Assistance Programs
- XII. Large Load / Data Centers
- XIII. Reliability
- XIV. Tariff Issues (Not Otherwise Briefed)
- XV. Electric Vehicle Program
- XVI. Customer Generator Issues
- XVII. Miscellaneous Issues
- XVIII. Conclusion

Note: Appropriate modifications may be made. For instance, a party might add "Affiliated Interest Expenses" as a major topic heading or might brief only rate structure and not use other topic headings. A summary and alternatives should be provided under "Rate Structure" but the "Rate Base" and "Rate Structure" formats shown may be modified, as appropriate. Additional subheadings should be used, as appropriate.