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October 31, 2025

Via Electronic Filing

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

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

Dear Secretary Homsher:

Enclosed for electronic filing please find the Retail Energy Supply Association's ("RESA") Petition to Intervene with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell.

DMO/lww

Enclosure

cc: Hon. Christopher P. Pell w/enc.
Hon. Barbara Shadie Nause w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of RESA's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

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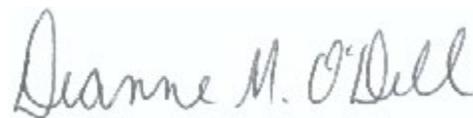
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Deanne M. O'Dell, Esq.

Dated: October 31, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PETITION TO INTERVENE OF
THE RETAIL ENERGY SUPPLY ASSOCIATION**

Pursuant to 52 Pa Code §§ 5.72-5.75, the Retail Energy Supply Association (“RESA”)¹ submits this Petition to Intervene in the above-referenced PPL Electric Utilities Corporation (“PPL” or “Company”) base rate proceeding. In support of this Petition, RESA states as follows:

I. BACKGROUND

1. RESA is a trade association of retail energy suppliers who share the common vision that competitive retail electricity markets deliver a more efficient, customer-oriented outcome than does the monopoly-protected, rate-regulated utility structure. RESA members are licensed to sell electric energy in the markets of Pennsylvania’s major electric distribution companies (“EDCs”), including in PPL’s service territory.

2. RESA’s attorneys in this matter are:

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¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

3. PPL's rate filing includes a number of proposals that, if approved, would have a significant negative effect on RESA and competitive markets more broadly. RESA has preliminarily identified a number of proposals that raise serious concerns. For example, PPL proposes to modify its supplier coordination tariff to begin recovering the costs for EDI transactions on a per transaction basis from electric generation suppliers ("EGSs"). PPL also proposes to assign costs to each EGS of testing a new DUNS system that the Company will set up for each EGS. PPL is also proposing numerous changes to its supplier tariff which RESA intends to carefully review for supplier impacts.

4. If adopted, these proposals will have a significant impact on the ability of EGSs to continue to provide competitive supply service in the PPL service territory given the likely increased costs and additional processes EGSs will have to manage. For these reasons, RESA should be permitted to intervene in this proceeding to be able to fully investigate the potential anticompetitive impact of PPL's various proposals. RESA is continuing to review PPL's filing and reserves its ability to raise additional issues as this matter proceeds.

II. PETITION TO INTERVENE

5. The Commission's regulations allow intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A "person" includes a corporation and an association. 52 Pa. Code § 1.8.

6. RESA meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). RESA members actively serve customers in PPL's service territory. PPL's proposals threaten to significantly increase costs on RESA's members and would serve to undermine competitive

markets in Pennsylvania. As such, RESA has interests that will be directly affected by this proceeding.

7. RESA will be bound by the action of the Commission in this proceeding. The Commission's decision on PPL's proposals will directly impact competitive market offerings and the products and services offered by RESA members.

8. As market leaders in the competitive retail supply industry, RESA has a direct and substantial interest in several issues regarding PPL's proposals, as discussed above. While RESA continues to evaluate PPL's rate filing, it is concerned that the proposed changes may negatively impact their ability to offer competitive products and services in PPL's service territory.

9. RESA's interests in this proceeding are unique from and not adequately represented by other parties that may seek to intervene, including individual EGSs or other organizations interested in electric competition in Pennsylvania in general and in PPL's service territory in particular. This is because RESA represents the interests of a diverse and broad group of EGSs in general and not the interests of any individual member.

10. For all these reasons, RESA possesses an "interest 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)(1).

11. Moreover, RESA's specific experience in PPL's service territory, as well as other service territories in Pennsylvania and across North America, uniquely positions it to review and assess this rate case filing. Accordingly, RESA's participation in this proceeding is clearly in the public interest. *See* 52 Pa. Code § 5.72(a)(3).

III. CONCLUSION

WHEREFORE, RESA respectfully requests that its Petition to Intervene be granted so that RESA may fully participate in this proceeding. RESA has interests in this proceeding that will be directly and substantially affected by the outcome of this proceeding, and its interests are sufficiently different from that of any other party so as to add measurably and constructively to the proceeding.

Respectfully submitted,



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Date: October 31, 2025

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