



October 31, 2025

VIA E-FILE

Secretary Matthew L. Homsher
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
Prehearing Conference Memorandum of Environmental Petitioners

Dear Secretary Homsher:

Enclosed please find the Prehearing Conference Memorandum of Environmental Defense Fund, Natural Resources Defense Council, and Citizens for Pennsylvania's Future in the above noted docket.

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

If there are any questions regarding this filing, please contact me directly at 267.838.9154.

Respectfully submitted,

/s/ Emma H. Bast

Emma H. Bast, Esq.

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

PPL Electric Utilities Corporation

Docket No. R-2025-3057164

**PREHEARING CONFERENCE MEMORANDUM OF ENVIRONMENTAL
DEFENSE FUND, NATURAL RESOURCES DEFENSE COUNCIL, AND
CITIZENS FOR PENNSYLVANIA’S FUTURE**

In response to the October 23, 2025 Prehearing Conference Order issued in the above-captioned matter, Environmental Defense Fund (“EDF”), Natural Resources Defense Counsel (“NRDC”), and Citizens for Pennsylvania’s Future (“PennFuture”) (collectively, “Environmental Petitioners”) provide the following information:

I. Introduction

On September 30, 2025, PPL Electric Utilities Corporation (PPL Electric), Utility Code 110500, filed proposed Original Tariff Electric – Pa. P.U.C. No. 202 and Original Tariff Electric – Pa. P.U.C. No. 2S, containing proposed changes in rates, rules, and programs calculated to produce \$356.3 million (33.4%) in additional annual revenues to become effective December 1, 2025.

On October 23, 2025, an Order (“October 23 Order”) was issued by the Honorable Deputy Chief Administrative Law Judge Christopher P. Pell and Administrative Law Judge Barbara Shadie Nause suspending the filing by operation of law and ordering that an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules, and programs contained in the proposed tariff be undertaken.

On October 29, 2025, Environmental Petitioners filed their Petition to Intervene.

II. Issues

Preliminarily, Environmental Petitioners have identified the following areas that require further consideration:

- a. Whether the cost allocation is just and reasonable.
- b. Whether the rate design, including the proposed electric vehicle time of use rate pilot, is just and reasonable.
- c. Whether PPL’s proposed tariff rules and conditions are just and reasonable.
- d. Whether PPL’s investments and operations related to grid-edge technologies and programs are just and reasonable.
- e. Whether PPL’s proposal with respect to maximum registered peak load is just, reasonable, and in conformity with applicable legal authority.

- f. Whether PPL's proposed rate base is just and reasonable.
- g. Whether PPL's proposed expenses are just and reasonable.
- h. Those issues identified by Vice Chair Kimberly Barrow in her Statement entered October 23, 2025 in this proceeding: PPL Electric's extended stay out; PPL Electric's capital structure; tracking capital from parent company; customer service issues and impact on ROE; cost allocation; and universal service.

Environmental Petitioners reserve the right to pursue additional issues that may arise throughout this proceeding.

III. Witnesses

Environmental Petitioners intend to present direct, rebuttal, and surrebuttal testimony of expert witnesses, as may be necessary. Assisting in the development of Environmental Petitioners' case will be:

Ron Nelson
Current Energy Group
2900 E Broadway Blvd
Ste 100 #780
Tucson, Arizona 85716
rnelson@currentenergy.group

IV. Proposed Hearing and Briefing Schedule

Environmental Petitioners are working with the parties to arrive at a mutually agreeable proposed procedural schedule. Environmental Petitioners support 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

Environmental Petitioners support I&E's proposal to hold the evidentiary hearings in Harrisburg.

V. Discovery

Environmental Petitioners are involved in discussions with parties to arrive at mutually agreeable modifications related to discovery in this proceeding. Environmental Petitioners support the discovery modifications proposed by the Office of Consumer Advocates (OCA) in this matter.

Environmental Petitioners additionally request 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.

VI. Service

Environmental Petitioners will be represented by the attorneys listed below:

Emma H. Bast, Esq.
PA. I.D.: 330854
Jessica R. O'Neill, Esq.
PA. I.D.: 205934
Citizens for Pennsylvania's Future
1429 Walnut St.
Suite 701
Philadelphia, PA 19102
267.838.9154
bast@pennfuture.org
oneill@pennfuture.org

Michael Zimmerman, Esq.
PA. I.D.: 323715
Environmental Defense Fund
257 Park Ave. S.
New York, NY 10010
512.691.3444
mzimmerman@edf.org

In accordance with 52 Pa. Code § 1.54(b)(3)(i), Environmental Petitioners agree to accept electronic mail delivery of documents on the due date as satisfying the in-hand requirement.

In addition to email copies of pleadings, briefs, and exceptions, Environmental Petitioners request email copies of responses to discovery propounded by PPL Electric Corporation or any other party.

A. Representation of Environmental Petitioners at Prehearing Conference

Please be advised that Ms. Emma H. Bast will speak as the lead attorney for Environmental Petitioners for purposes of the prehearing conference. However,

other counsel for Environmental Petitioners will be participating and available during the telephonic prehearing conference as needed.

VII. Settlement

Environmental Petitioners will participate in settlement discussions in this matter.

VIII. Public Input Hearings

Environmental Petitioners are aware of two formal letters requesting public input hearings in Lancaster and Scranton. Environmental Petitioners support the proposal to hold these hearings the week of December 1, 2025.

Environmental Petitioners encourage the Commission to consider the use of both in-person and telephonic public input hearings to encourage participation by ratepayers.

Dated: October 31, 2025

Respectfully submitted,

/s/ Emma H. Bast

Emma H. Bast, Esq.

PA. I.D.: 330854

Jessica R. O'Neill, Esq.

PA. I.D.: 205934

Citizens for Pennsylvania's Future
1429 Walnut St.

Suite 701
Philadelphia, PA 19102
267.838.9154
bast@pennfuture.org
oneill@pennfuture.org
Counsel for EDF, NRDC, and PennFuture

Michael Zimmerman, Esq.
PA. I.D.: 323715
Environmental Defense Fund
257 Park Ave. S.
New York, NY 10010
512.691.3444
mzimmerman@edf.org
Counsel for EDF

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

PPL Electric Utilities Corporation

Docket No. R-2025-3057164

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the following document upon the parties of record to this proceeding, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party) in the manner and upon the persons listed below.

Service By Email Only

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	David B. MacGregor, Esq. Garrett P. Lent, Esq. Post & Schell, P.C. 17 North Second Street 12th Floor Harrisburg, PA 17101-1601 dmacgregor@postschell.com glent@postschell.com
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	Michael A. Podskoch, Jr., Esq. Adam J. Williams, Esq. Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 mpodskoch@pa.gov adawilliam@pa.gov
Rebecca Lyttle, Esq. Steven C. Gray, Esq.	Christy M. Appleby, Esq. Harrison W. Breitman, Esq.

Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101 relyttle@pa.gov sgray@pa.gov	Jacob D. Guthrie, Esq. Darryl A. Lawrence, Esq. Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923 OCA25PPLBRC@paoca.org
Joseph L. Vullo, Esq. Burke Vullo Reilly Roberts 1460 Wyoming Avenue Forty Fort, PA 18704 jlvullo@bvrrlaw.com	Jennifer Woolley 2914 Hodle Ave. Easton, PA 18045-8103 jwoolley4@rcn.com
Daniel A. Garcia, Esq. Brian Pulito, Esq. Steptoe & Johnson, PLLC 1 PPG Place Pittsburgh, PA 15222 Daniel.garcia@Steptoe-Johnson.com Brian.Pulito@Steptoe-Johnson.com	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
Devin McDougall, Esq. Earthjustice 1617 JFK Blvd. Suite 1130 Philadelphia, PA 19103 dmcdougall@earthjustice.org	Ria M. Pereira, Esq. Elizabeth R Marx, Esq. John W. Sweet, Esq. Lauren N. Berman, Esq. PA Utility Law Project 118 Locust Street Harrisburg, PA 17101 PULP@pautilitylawproject.org
Daniel B. Markind, Esq. Flaster Greenberg, PC 1717 Arch Street, Suite 3300 Philadelphia, PA 19103 Daniel.markind@flastergreenberg.com	

Respectfully submitted,

/s/ Emma H. Bast

Emma H. Bast, Esq.

PA. I.D.: 330854

Counsel for EDF, NRDC, and PennFuture