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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; **PETITION TO INTERVENE OF THE
PROFESSIONAL DAIRY MANAGERS OF PENNSYLVANIA**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of the Professional Dairy Managers of Pennsylvania ("PDMP") in the above-captioned dockets. Copies of this Petition have been served as indicated on the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "T. Stewart", is written over a large, loopy blue scribble.

Todd S. Stewart
*Counsel for the Professional Dairy
Managers of Pennsylvania ("PDMP")*

TSS/jld
Enclosure

cc: Administrative Law Judge Christopher P. Pell (via electronic mail – cpell@pa.gov)
Administrative Law Judge Barbara Shadie Nause (via electronic mail – bshadienau@pa.gov)
Per Certificate of Service

CERTIFICATE OF SERVICE

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

VIA ELECTRONIC MAIL

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Todd S. Stewart

DATED: October 31, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos. R-2025-3057164
Coalition for Affordable Utility Services and	:	
Energy Efficiency in Pennsylvania	:	C-2025-3057844
Office of Small Business Advocate	:	C-2025-3057889
Brad and Jennifer Wooley	:	C-2025-3057946
	:	
v.	:	
	:	
PPL Electric Utilities Corporation	:	

**PETITION TO INTERVENE
OF THE PROFESSIONAL DAIRY MANAGERS OF PENNSYLVANIA**

NOW COME the Professional Dairy Managers of Pennsylvania (“PDMP”), by and through their counsel, HMS Legal LLP, and hereby submit this Petition to Intervene pursuant to 52 Pa. Code §5.71. *et. seq.*, in the above captioned proceeding before the Pennsylvania Public Utility Commission (“Commission”). In support of its Petition, PDMP states and avers as follows:

1. On or about September 30, 2025, PPL Electric Utilities, Corporation (“PPL”) filed proposed Original Tariff Electric - Pa. P.U.C. No. 2S, which contained changes in rates, rules and regulations, and which is calculated to produce an additional \$365 million in annual revenue for PPL. The filing included tariffs that will substantially modify the manner in which customer generators are compensated for excess generation.

2. The Alternative Energy Portfolio Standards Act (“AEPS Act”) requires that Customer-Generators receive full retail value for all generation on an annual basis and PPL’s proposed changes will violate that requirement.

3. PDMP is a non-profit membership organization seeking to promote and preserve the efficient and sustainable operation of Pennsylvania's dairy farms. PDMP has a number of members that are Customer-Generators and that operate anaerobic digesters as part of their dairy operations within the PPL service territory.¹ The PDMP members employ the digesters as a means of addressing environmental concerns regarding animal waste and the technology has proven to be a win – win for dairy farmers, which is why the technology is supported by the AEPSA. The changes to PPL's tariff will harm PDMP's members, and because of the technology to generate electricity by its members and the manner in which such technology is integrated into their dairy operations, cannot be adequately represented by any other party. PDMP's members that operate anaerobic digesters to generate electricity that are interconnected with PPL's system will be bound by any decision of the Commission in this proceeding.

4. PDMP is represented in the above-captioned matter by the following counsel:

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5. The Commission's regulations at 52 Pa. Code § 5.72(a)(2) establish the standard for eligibility to participate in a matter before the Commission as having 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." PDMP meets this standard. As a representative of its members, PDMP is authorized to represent those

¹ Reinford Farms of Mifflintown, Brubaker Farms of Mount Joy, and S & A Kreider Farm of Quarryville are three such members.

interests in this proceeding. The Customer-Generator members of PDMP will be substantially harmed by PPL's change in its tariff, and in particular its proposal to change the definition of peak load to include generation. This change will have the effect of causing customer-generators that have made substantial investments in digesters and the associated technology to be deprived of compensation for excess generation to which they are statutorily entitled and will now run the risk of stranded investments in addition to not being compensated as required. Moreover, because of the generation technology they use, the profile of their export of energy is different from that of other customer-generators.

6. Accordingly, PDMP meets the standard of having a substantial interest in the outcome of this proceeding, an interest that is unique and which cannot be represented by any other party and an interest that will be bound by any Commission decision in this matter.

WHEREFORE, the Professional Dairy Managers of Pennsylvania respectfully request that the Presiding Administrative Law Judges and Commission, grant their Petition to Intervene in the above-captioned matter and provide them will full party status in this proceeding.

Respectively submitted,



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*Counsel for the Professional Dairy
Managers of Pennsylvania ("PDMP")*

DATED: October 31, 2025