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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; **PREHEARING CONFERENCE
MEMORANDUM OF THE PROFESSIONAL DAIRY MANAGERS OF
PENNSYLVANIA**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Conference Memorandum of the Professional Dairy Managers of Pennsylvania ("PDMP") in the above-captioned dockets. Copies of this Memorandum 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 "Todd S. Stewart", is written over a horizontal line.

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	:	

**PREHEARING CONFERENCE MEMORANDUM
OF PROFESSIONAL DAIRY MANAGERS OF PENNSYLVANIA**

**TO THE HONORABLE CHRISTOPHER P. PELL:
TO THE HONORABLE BARBARA SHADIE NAUSE:**

Pursuant to the Prehearing Order dated October 23, 2025, in the above-captioned matter and the Commission’s regulations at 52 Pa. Code §5.221, *et seq.*, Professional Dairy Managers of Pennsylvania (“PDMP”) by and through its counsel, HMS Legal LLP, hereby submit its Prehearing Conference Memorandum.

I. PROCEDURAL HISTORY

1. On or about September 30, 2025, PPL Electric Utilities Corporation (“PPL”) filed the above-captioned matter with the Pennsylvania Public Utility Commission (“Commission”).
2. On October 31, 2025 (simultaneously with the filing of this prehearing memo) the PDMP filed a Petition to Intervene in the above-captioned proceeding.

II. EXPECTED ISSUES

3. PDMP presently intends to address the illegal tariff changes that will modify the definition of Peak Demand to include generation as well as consumption of electricity and which will have substantial negative impact on PDMP's members dairy operations in the PPL service territory.

III. PROPOSED WITNESSES

4. PDMP has not yet identified a witness for this matter, but will apprise Your Honors and the other parties as soon as that decision is made.

IV. LITIGATION SCHEDULE

5. PDMP is committed to working with the other parties and Your Honors to develop a schedule that meets all the parties' needs.

V. DISCOVERY

6. PDMP has not submitted discovery as of the date of this Prehearing Memorandum but will endeavor to do so as soon as possible. PDMP will work cooperatively with PPL and all the other parties in order to minimize discovery issues that might require the attention of the Presiding Administrative Law Judges. Moreover, PDMP would not object to the typical discovery modifications proposed by the Office of Consumer Advocate in cases such as this.

VI. SETTLEMENT

7. PDMP is willing to engage in settlement discussion with any and all parties at any time during this proceeding and welcome the opportunity to do so at the earliest possible date.

WHEREFORE, the Professional Dairy Managers of Pennsylvania submit this Prehearing Conference Memorandum in anticipation of the Prehearing Conference currently scheduled to be held telephonically on Wednesday, November 5 at 9:00 am.

Respectively submitted,



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*Counsel for Professional Dairy Managers of
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DATED: October 31, 2025