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October 31, 2025

***By Electronic Filing***

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor (Filing Room)  
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation;  
Docket No. R-2025-3057164, et al.; **SEF PETITION TO INTERVENE**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is The Sustainable Energy Fund's ("SEF") Petition to Intervene in the above-captioned proceeding. A Prehearing Conference Memorandum will be submitted upon approval of SEF's request to intervene.

If you have any questions, please contact me.

Very truly yours,

*/s/ Judith D. Cassel*

Judith D. Cassel  
Micah R. Bucy

*Counsel for The Sustainable Energy Fund*

JDC/das  
Enclosure

Cc: Honorable Christopher P. Pell (by email, [cpell@pa.gov](mailto:cpell@pa.gov))  
Honorable Barbara Shadie Nause (by email, [bshadienau@pa.gov](mailto:bshadienau@pa.gov))  
Per Certificate of Service

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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**PETITION TO INTERVENE OF  
THE SUSTAINABLE ENERGY FUND**

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The Sustainable Energy Fund (“SEF”), by and through its attorneys, HMS Legal, LLP, files this Petition to Intervene in the above-captioned proceeding pursuant to 52 Pa. Code § 5.71, *et seq.* In support of its intervention, SEF avers as follows:

**I. BACKGROUND**

1. On September 30, 2025, Pursuant to Section 1308(8) of the Public Utility Code, 66 Pa. C.S. § 1308(d), PPL Electric Utilities Corporation (“PPL”) filed its Original Tariff Electric Pa. P.U.C. No. 202 (“PPL’s Tariff”) with the Pennsylvania Public Utility Commission (“Commission”).

2. PPL’s Tariff proposes to increase costs to consumers by increasing annual revenues by \$356 million, an increase of approximately 33%.

3. PPL’s Tariff proposes a myriad of other changes that would negatively impact consumers in PPL’s territory.

4. PPL’s Tariff, if approved, would substantially affect SEF’s customers and in turn, SEF.

5. By Order entered on October 24, 2025, the Commission suspended PPL's Tariff for an investigation under 66 Pa.C.S. § 1308(d) and the matter was assigned to the Office of Administrative Law Judge ("OALJ") for hearings on the matter.

## II. SEF's INTEREST IN THIS PROCEEDING

6. SEF is a Pennsylvania corporation established upon the conclusion of PPL's Restructuring Proceeding and pursuant to the terms of the Joint Settlement of that proceeding approved by the Commission's August 27, 1998 Order at Docket No. R-00973954. SEF's mission is to promote and invest in energy efficiency, renewable energy and energy education that provide opportunities and benefits for PPL ratepayers. SEF was previously granted intervention in PPL's petition for approval of its Second Distributed Energy Resources Management Plan at Docket No. P-2024-3049223.

7. SEF's customers, its mission, and its own financial health stand to be adversely impacted by PPL's Tariff, if approved.

8. SEF's address is as follows:

The Sustainable Energy Fund  
4250 Independence Drive  
Suite 100  
Schnecksville, PA 18078

9. The name, address, and telephone number of SEF's attorneys are:

Judith Cassel  
PA Attorney ID. No. 209393  
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### **III. STANDARD FOR INTERVENTION**

10. Eligibility to intervene in Commission proceedings is governed by the Commission's regulations found at 52 Pa. Code § 5.72. The Commission's regulations provide that in order to have the ability to intervene, a party must have "a right or interest" sufficient to warrant intervention, which includes an interest that may be directly affected by the proceeding and which is not being adequately represented by existing participants, and where the petitioner may be bound by the actions of the Commission or where the right or interest is otherwise in the public interest

11. SEF's mission, as noted above, is to promote, invest in, and reduce barriers, including cost barriers, to energy efficiency, renewable energy and energy education that provide opportunities and benefits for PPL ratepayers. In furtherance of its mission, SEF assists its customers in projects that emphasize renewable energy sources, such as solar and wind power development, clean energy technologies, energy conservation and efficiency, as well as energy education.

12. SEF's intervention is necessary to insure the development of a complete record on the reasonableness of PPL's Tariff. SEF is directly impacted by the outcome of these proceedings as its customers, and in turn SEF, would be impacted by increased rates and other barriers to renewable energy projects. SEF is also affected by the outcome of these proceedings as it facilitates renewable energy projects for contractors, businesses, and consumers in the PPL service territory. SEF has a unique perspective, in keeping with its mission to promote and invest in energy efficiency, renewable energy, and energy education that provide opportunities and benefits for PPL ratepayers, that cannot be represented by any other party to this proceeding, which is in the public interest and which should be considered by the Commission.

13. SEF intends to actively participate in this proceeding.

WHEREFORE, the Sustainable Energy Fund's intervention has met the intervention standards of 52 Pa. Code § 5.72 and otherwise is in the public interest, SEF requests that the Pennsylvania Public Utility Commission grants its Petition to Intervene in the above-captioned proceeding and grant it full party status.

Respectfully submitted,

*/s/ Judith D. Cassel* \_\_\_\_\_

Judith D. Cassel

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*Counsel for The Sustainable Energy Fund*

DATED: October 31, 2025

## VERIFICATION

I, John M. Costlow, President and CEO, on behalf of the Sustainable Energy Fund of Central Eastern Pennsylvania, verify that the facts contained in the foregoing document are true and correct to the best of my knowledge, information and belief. This Verification is made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.



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John M. Costlow  
President & CEO  
The Sustainable Energy Fund of Central  
Eastern Pennsylvania

Dated: October 31, 2025

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this filing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

### VIA EMAIL ONLY

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*(Counsel for Aspen Power, 38 Degrees, CVE North America, Syncarpha Capital, LLC, Twilight Renewables, Bollinger Solar, and CEP Renewables, LLC (Collectively, Customer-Generator Coalition))*

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DATE: October 31, 2025

/s/ Judith D. Cassel  
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