

October 31, 2025

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

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

Dear Secretary Homsher:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Petition to Intervene of Walmart Inc. ("Walmart") in the above-referenced matter.

This document was filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the enclosed Certificate of Service.

Please contact me if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By 

Barry A. Naum
Steven W. Lee
Jamie L. Martines

SWL/sds
Enclosures

c: Deputy Chief Administrative Law Judge Christopher P. Pell (via E-mail)
Administrative Law Judge Barbara Shadie Nause (via E-mail)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

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

VIA E-MAIL

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Steven W. Lee

Dated: October 31, 2025

3. On September 30, 2025, PPL Electric Utilities Corporation ("PPL Electric" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") Original Tariff Electric – Pa. P.U.C. No. 202 ("Filing"), representing a request for a general increase in the Company's electric distribution rates of approximately \$356 million with an anticipated effective date of July 1, 2026. The Company is also requesting a return on equity ("ROE") of 11.30 percent. The effective date of new rates was suspended until July 1, 2026, by Order of the Commission issued on October 23, 2025.

4. Walmart has the privilege of providing its retail services in the Commonwealth of Pennsylvania through its 116 Supercenters, 19 Discount Stores, 24 Sam's Clubs, and 11 Supply Chain Facilities.¹ Walmart is also a retail customer of PPL Electric. Walmart has 47 retail units and related facilities served by the Company. Additionally, Walmart purchases more than 163 million kWh annually from PPL Electric, pursuant to Rate Schedules GS1, GS3, LP4, and OP3. The cost of electricity therefore comprises a significant portion of the operating costs of Walmart's various retail and supply chain locations.

5. Walmart is still in the process of evaluating whether it will sponsor testimony in this proceeding. In the event Walmart decides to sponsor testimony, Walmart will likely submit testimony from Matthew T. Lyon, Senior Manager, Utility Partnerships – Regulatory, and will promptly inform the parties and the presiding Administrative Law Judges ("ALJs") if this changes. Regardless, if intervention is granted, Walmart requests the right to participate in this proceeding as an active participant and adduce evidence through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, as necessary.

¹ <https://corporate.walmart.com/about/location-facts/united-states/pennsylvania>

6. The Commission's final determination in this proceeding may directly impact the rates, terms, and conditions of the electric service that Walmart receives from the Company. Walmart therefore has a direct, substantial, and unique interest in the outcome of this proceeding that is not represented by any other party. *See* 52 Pa. Code § 5.72(a)(2).

WHEREFORE, Walmart Inc. requests that the Commission grant this Petition to Intervene and provide Walmart with full party status in this proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By  _____

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Counsel to Walmart Inc.

Dated: October 31, 2025

VERIFICATION

I, Steven W. Lee, Counsel to Walmart Inc., hereby state that the factors set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to 18 Pa.C.S. § 4904 (pertaining to unsworn falsification to authorities).

Date: October 31, 2025



Steven W. Lee