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File #: 209995

October 31, 2025

***VIA ELECTRONIC FILING***

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: PA Public Utility Commission, *et al.* v. PPL Electric Utilities Corporation  
Docket Nos. R-2025-3057164, *et al.***

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Dear Secretary Homsher:

Attached for filing is the Prehearing Conference Memorandum of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DR/bfc  
Enclosures

cc: Honorable Christopher P. Pell (*via email; w/enclosure*)  
Honorable Barbara Shadie Nause (*via email; w/enclosure*)  
Certificate of Service

## 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 E-MAIL

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Dated: October 31, 2025

A handwritten signature in blue ink, consisting of several overlapping, fluid strokes that form a cursive name.

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Devin T. Ryan

**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 Consumer Advocate	:	C-2025-3058130
Office of Small Business Advocate	:	C-2025-3057889
Brad and Jennifer Wooley	:	C-2025-3057946
	:	
v.	:	
	:	
PPL Electric Utilities Corporation	:	

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**PREHEARING CONFERENCE MEMORANDUM OF  
PPL ELECTRIC UTILITIES CORPORATION**

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**TO DEPUTY CHIEF ADMINISTRATIVE LAW JUDGE CHRISTOPHER P. PELL AND  
ADMINISTRATIVE LAW JUDGE BARBARA SHADIE NAUSE:**

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Prehearing Conference Memorandum in the above-captioned proceedings in accordance with the Prehearing Conference Order issued by Deputy Chief Administrative Law Judge Christopher P. Pell and Administrative Law Judge Barbara Shadie Nause (“ALJs”) on October 23, 2025, and states as follows:

**I. INTRODUCTION**

On September 30, 2025, PPL Electric filed with the Pennsylvania Public Utility Commission (“Commission”) Original Tariff Electric – Pa. P.U.C. No. 202 (“Tariff No. 202”) and Original Tariff Electric – Pa. P.U.C. No. 2S (“Tariff No. 2S”), along with supporting information required by 52 Pa. Code §§ 53.52 and 53.53, to become effective December 1, 2025. In Tariff No. 202, PPL Electric proposes a general increase in annual base electric distribution revenue of \$356,271,443.

The principal reasons for the filing are: (1) accelerated capital investment to maintain and improve system reliability and to reduce service outages, especially during major storms; (2) investments in our customer service offerings to meet or exceed customer expectations including improved payment options, easier customer service interactions, and increased service levels; (3) upgrading the Company’s aging IT infrastructure to improve cybersecurity, customer interactions, and employee facing systems; (4) flat residential and commercial sales as a result of a slow economic growth and increased levels of distributed generation from alternative energy systems/net metering; and (5) setting rates based on cost of service. Although the Company has been able to avoid filing a rate case for a decade by leveraging operating efficiencies and smart investments, this base rate increase is necessary for the Company to continue to provide high-quality electric service and to meet and exceed customer and Commission expectations as to reliability and service.

On October 2, 2025, the Office of Small Business Advocate (“OSBA”) filed a Notice of Appearance.

On October 6, 2025, the Commission on Economic Opportunity (“CEO”) filed a Petition to Intervene.

Also on October 6, 2025, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) filed a Complaint. CAUSE-PA’s Complaint was assigned Docket No. C-2025-3057844.

On October 9, 2025, OSBA filed a Complaint, Public Statement, and Verification. OSBA’s Complaint was assigned Docket No. C-2025-3057889.

Also on October 9, 2025, the Commission’s Bureau of Investigation and Enforcement (“I&E”) filed a Notice of Appearance.

On October 14, 2025, PPL Electric was served with a Complaint filed by Brad and Jennifer Woolley at Docket No. C-2025-3057946 regarding the Company's proposed electric rate increase at Docket No. R-2025-3057164.

On October 16, 2025, CAUSE-PA filed a Notice of Appearance.

Also on October 16, 2025, Aspen Power, 38 Degrees, CVE North America, Syncarpha Capital, LLC, Twilight Renewables, Bollinger Solar, and CEP Renewables, LLC (collectively, the "Customer-Generator Coalition" or the "CGC") filed a Petition to Intervene.

On October 17, 2025, Eric Joseph Epstein filed a Petition to Intervene.

On October 22, 2025, PPL Electric filed a letter with the Commission indicating that it will not be filing an Answer to the Complaint of Brad and Jennifer Woolley at Docket No. C-2025-3057946, because the Complaint is associated with a base rate proceeding.

On October 23, 2025, the Commission entered an Order suspending Tariff Nos. 202 and 2S by operation of law until July 1, 2026, unless otherwise directed by Order of the Commission. Vice Chair Barrow also issued a Statement regarding the proceeding.

Also on October 23, 2025, an Initial Telephonic Prehearing Conference Notice was issued, which scheduled a prehearing conference in the above-captioned matter for Wednesday, November 5, 2025, at 9:00 AM before the ALJs. The ALJs also issued a Prehearing Conference Order which, among other things, directed the parties to file Prehearing Conference Memoranda on or before Friday, October 31, 2025.

Further, on October 23, 2025, the Office of Consumer Advocate ("OCA") filed a Complaint, Public Statement, and Notice of Appearance. OCA's Complaint was assigned Docket No. C-2025-3058130.

On October 27, 2025, the Coalition for Community Solar Access (“CCSA”) and the Solar Energy Industries Association (“SEIA”) (collectively, the “Joint Solar Advocates”) filed a Petition to Intervene. Also on October 27, 2025, CGC filed a Notice of Appearance. Further, on October 27, 2025, the Commission served a copy of a letter submitted by the City of Lancaster requesting a public input hearing to be held in Lancaster, Pennsylvania.

On October 28, 2025, the Clean Air Council, Vote Solar, and the Union of Concerned Scientists (collectively, the “Energy Justice Advocates” or “EJA”) filed a Petition to Intervene and Protest. Also on October 28, 2025, Dimension PA 1 LLC filed a Petition to Intervene. Further, on October 28, 2025, CAUSE-PA filed a Notice of Appearance.

On October 29, 2025, Environmental Defense Fund (“EDF”), Natural Resources Defense Council (“NRDC”), and Citizens for Pennsylvania’s Future (“PennFuture”) (collectively, “Environmental Petitioners”) filed a Petition to Intervene.

On October 31, 2025, PPL Electric filed a Notice of Entry of Appearance, the Joint Solar Advocates filed a Complaint, the Retail Energy Supply Association (“RESA”) filed a Petition to Intervene, the Professional Dairy Managers of Pennsylvania (“PDMP”) filed a Petition to Intervene, and Walmart Inc. (“Walmart”) filed a Petition to Intervene. Additionally, various parties filed Prehearing Memoranda in the proceeding.

Various comments have been filed by individuals in the proceeding regarding the proposed base rate increase as well.

## **II. SERVICE OF DOCUMENTS**

PPL Electric’s attorneys in this proceeding are Kimberly A. Klock, Esquire, Michael J. Shafer, Esquire, David B. MacGregor, Esquire, Devin T. Ryan, Esquire, Garrett P. Lent, Esquire, Anthony C. DeCusatis, Esquire, Erin R. Kawa, Esquire, Alice A. Wade, Esquire, and Hayley E. Wilburn, Esquire. Please list Devin T. Ryan on the service list on behalf of PPL Electric. The lead

representative on behalf of PPL Electric for purposes of the prehearing conference will be Mr. Ryan. Mr. Ryan's contact information is as follows:

Devin T. Ryan, Esquire  
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PPL Electric also requests that Ms. Klock (kklock@pplweb.com), Mr. Shafer (mjshafer@pplweb.com), Mr. MacGregor (dmacgregor@postschell.com), Mr. Lent (glent@postschell.com), Mr. DeCusatis (adecusatis@postschell.com), Ms. Kawa (ekawa@postschell.com), Ms. Wade (alice.wade@postschell.com), and Ms. Wilburn (hwilburn@postschell.com) be included on all electronic mail sent in this proceeding, along with Michelle L. Bartolomei (mlbartolomei@pplweb.com), Thomas Connolly (tconnolly@postschell.com), Danielle M. Caley (dcaley@postschell.com), and Brittney Corey (bcorey@postschell.com).

PPL Electric's attorneys are authorized to accept service on behalf of PPL Electric in this proceeding. PPL Electric requests that the Commission and all parties of record serve copies of all discovery requests and answers, correspondence, Commission Orders, and any other documents issued in this proceeding on its attorneys.

### **III. WITNESSES AND ISSUES**

Below is a list of the witnesses and the areas of their testimony comprising PPL Electric's initial direct case in this proceeding. The subject matters listed below as further detailed in the Company's testimony represent as complete a statement of issues that PPL Electric can provide at this stage of the proceeding. Further definition of the issues will be developed during the course of the proceeding.

<b>Stmnt No.</b>	<b>Witness</b>	<b>Summary of Issues Addressed</b>
1	Christine M. Martin President PPL Electric Utilities Corporation 827 Hausman Road Allentown, PA 18104	Overview of Rate Case Filing; and Principal Reasons for Rate Case Filing
2	Dennis A. Urban Senior Director, Finance Transformation PPL Electric Utilities Corporation 645 Hamilton Street, Suite 9 Allentown, PA 18101	Current Financial Condition; July 1, 2024, through June 30, 2025 Actual Results of Operations; and July 2025-June 2026 & July 2026-June 2027 Capital and Operating Budgets Act 40 of 2016
3	Christopher Garrett Vice President – Financial Strategy and Chief Risk Officer PPL Services Corporation 2701 Eastpoint Parkway Louisville, KY 40223	Support Group Costs; Employee Benefit Costs; and Capitalization of Certain IT Costs
4	Charles R. Schram Vice President, Energy Supply and Analysis LG&E and KU Services Company 2701 Eastpoint Parkway Louisville, KY 40223	Sales Forecast; Load Forecast; and Annualization of Sales and Revenue
5	Bethany L. Johnson Senior Director of Regulatory PPL Services Corporation 827 Hausman Road Allentown, PA 18104	Overview of Revenue Requirement, Cost of Service, and Rate Design

6	<p>Daniel S. Dane  President  Concentric Energy Advisors,  Inc.  293 Boston Post Road West,  Suite 500  Marlborough, MA 01752</p>	<p>Revenue Adjustments;  Rate Base Adjustments;  Expense Adjustments; and  Revenue Requirement</p>
7	<p>Bickey Rimal  Vice President  Concentric Energy Advisors,  Inc.  1300 19<sup>th</sup> Street, Suite 620  Washington, DC 20036</p>	<p>Class Revenue Allocation; and  Cost Allocation Studies</p>
8	<p>Steven W. Wishart  Assistant Vice President  Concentric Energy Advisors,  Inc.  293 Boston Post Road West,  Suite 500  Marlborough, MA 01752</p>	<p>Rate Design;  Standby Service Tariff (Rule 6 and 6A);  Proof of Revenues;  Proposed Rates; and  Bill Impacts</p>
9	<p>Julissa Burgos  Assistant Treasurer  PPL Services Corporation  and PPL Electric Utilities  Corporation  Two City Center  645 Hamilton Street, Suite 9  Allentown, PA 18101</p>	<p>Capital Structure; and  Embedded Cost of Capital</p>
10	<p>Jennifer E. Nelson  Vice President  Concentric Energy Advisors,  Inc.  293 Boston Post Road West,  Suite 500  Marlborough, MA 01752</p>	<p>Return on Equity; and  Capital Structure</p>

11	<p>John J. Spanos  President  Gannett Fleming Valuation  and Rate Consultants, LLC  300 Sterling Parkway  Mechanicsburg, PA 17050</p>	<p>Depreciation Service Lives</p>
12	<p>Andrew W. Elmore  Vice President – Tax  PPL Corporation  645 Hamilton Street  Allentown, PA 18101</p>	<p>Taxes</p>
13	<p>Katelyn Arnold  Manager – Regulatory  Strategy &amp; Rates  PPL Services Corporation  827 Hausman Road  Allentown, PA 18104</p>	<p>Cash Working Capital;  Roll-in of Riders;  CER Elimination;  Uncollectible Accounts, Purchase of  Receivables, and Merchant Function  Charge;  SDER; and  Revenue Forecast</p>
14	<p>Gregory Olsen  Supervisor – Distribution  Interconnections &amp; Tariff  Rules  PPL Services Corporation  827 Hausman Road  Allentown, PA 18104</p>	<p>Retail Tariff; and  Street Light Replacement Program</p>
15	<p>Andrew Castanaro  Energy Procurement  Manager  PPL Services Corporation  827 Hausman Road  Allentown, PA 18104</p>	<p>Maximum Registered Peak Load</p>
16	<p>Joseph Lookup  Vice President –  Transmission and  Distribution Planning and  Asset Management  PPL Services Corporation  827 Hausman Road  Allentown, PA 18104</p>	<p>Reliability Performance;  Storm Restoration and Planning; and  Large Load Interconnection</p>

17	<p>Nicole Howell  Manager – Vegetation Management &amp; Program Management  PPL Electric Utilities Corporation  827 Hausman Road  Allentown, PA 18104</p>	Vegetation Management
18	<p>Lisa Norden  Vice President – Customer Services  PPL Electric Utilities Corporation  827 Hausman Road  Allentown, PA 18104</p>	Customer Service Performance; Customer Benefits of IT Upgrades; Payment Transaction Fees; Universal Services Program Salaries; Universal Services CAP Cost Recovery Offset; and Supplier Tariff
19	<p>Daniel Johnson  Senior Vice President, Chief Information Officer  PPL Services Corporation  280 Melrose Street  Providence, RI 02907</p>	IT Upgrades
20	<p>James Conrad  Senior Director of T&amp;D Smart Grid &amp; Automation  PPL Services Corporation  827 Hausman Road  Allentown, PA 18104</p>	Electric Vehicles
21	<p>Jason Hunt  Manager of Business and Economic Development  PPL Services Corporation  320 Market Street, 4<sup>th</sup> Floor  Strawberry Square,  Harrisburg 17101</p>	Economic Development
22	<p>Sharon Leskowsky  Assistant Controller  PPL Corporation  645 Hamilton Street, Suite 9  Allentown, PA 18101</p>	Filing Requirements and Exhibits

The testimony and exhibits fully support PPL Electric’s proposed rate increase as well as the allocation of revenue and design of rates to recover that increase from customers. The Company reserves the right to present testimony on additional issues and subject matters that may arise during the course of the proceeding.

**IV. DISCOVERY**

To date, the Company has received multiple sets of interrogatories from the parties and has been responding to them. PPL Electric also encourages the use of informal discovery processes as the proceeding progresses. The Company is not aware of any discovery issues and does not propose any special orders regarding discovery.

**V. PROTECTION OF CONFIDENTIAL INFORMATION**

PPL Electric will submit a Motion for Protective Order for consideration by the ALJ. The Company will seek the concurrence of the other parties as to the form of the Protective Order before submitting the Motion.

**VI. LITIGATION SCHEDULE**

PPL Electric has consulted with counsel for the other parties about a proposed procedural schedule. Based on those discussions, the Company proposes the following schedule:

Prehearing Conference	November 5, 2025
Other Parties’ Direct Testimony	December 22, 2025
Rebuttal Testimony	January 23, 2026
Surrebuttal Testimony	February 9, 2026
Rejoinder Testimony	February 13, 2026
Hearings	February 17-20, 2026
Main Briefs	March 10, 2026
Reply Briefs	March 20, 2026

PPL Electric also proposes incorporating the following settlement conference dates into the litigation schedule: (1) January 6, 2026; (2) January 27, 2026; and (3) February 3, 2026.

PPL Electric also will work with parties and the ALJs to develop dates and times for public input hearings to be held in this proceeding. The Company supports holding the public input hearings in advance of the due date for other parties' direct testimony, so that the testimony provided at the public input hearings can be reflected in other parties' direct testimony.

## **VII. SETTLEMENT DISCUSSIONS**

PPL Electric is available for settlement discussions with the other parties. The Company expects to undertake settlement negotiations at the earliest time available. PPL Electric also supports incorporating settlement conferences into the litigation schedule adopted in this proceeding, as noted above.

Respectfully submitted,



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Date: October 31, 2025

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