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October 31, 2025

VIA ELECTRONIC FILING

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

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

Dear Secretary Homsher:

Attached for filing with the Pennsylvania Public Utility Commission is the Prehearing Memorandum on behalf of the PP&L Industrial Customer Alliance (“PPLICA”), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', written over a horizontal line.

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

Counsel to the PP&L Industrial Customer Alliance

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing documents upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

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Adeolu A. Bakare

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Dated this 31st day of October 2025, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING MEMORANDUM
OF THE PP&L INDUSTRIAL CUSTOMER ALLIANCE**

As requested by Deputy Chief Administrative Law Judge ("DCALJ") Christopher P. Pell and Administrative Law Judge ("ALJ") Barbara Shadie Nause in the Prehearing Conference Order dated October 23, 2025, the PP&L Industrial Customer Alliance ("PPLICA") hereby submits this Prehearing Memorandum.

I. HISTORY OF THE PROCEEDING

On September 30, 2025, PPL Electric Utilities Corporation ("PPL" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") Tariff Electric – Pa. P.U.C. No. 202 ("Tariff No. 202"), proposed to become effective on December 1, 2025. Through the filing, PPL requested an increase in its annual distribution revenue of approximately \$356.3 million, or 33.42% as well as certain modifications to its tariff.

Concurrently with the filing of this Prehearing Memorandum, PPLICA is filing a Complaint in this proceeding. A description of PPLICA is set forth in Paragraph 7 of PPLICA's Complaint.

On October 23, 2025, the Commission suspended PPL's proposed filing by operation of law until July 1, 2026, and instituted an investigation into the Company's proposed Tariff No. 202.

A Prehearing Conference has been scheduled in this proceeding for November 5, 2025.

II. IDENTIFICATION OF LEAD ATTORNEY

For purposes of the Prehearing Conference, Adeolu A. Bakare will speak as the lead attorney on behalf of PPLICA.

III. ANTICIPATED ISSUES AND SUB-ISSUES

PPLICA's preliminary review of the Company's filing indicates a need for Commission investigation into at least the following issues:

- a) Whether the size of the requested rate increase is appropriate;
- b) Whether the expenses claimed by PPL were prudently incurred;
- c) Whether the allocation of the proposed distribution rate increase between and among customer classes is just, reasonable and non-discriminatory;
- d) Whether PPL's proposed rate structure and rate design are appropriate, just, reasonable, and not unduly discriminatory, specifically including the proposed rate design changes for customers on Rate Schedules LP-4 and LP-5;
- e) Whether PPL's proposed tariff changes are just and reasonable;
- f) Whether the 11.30% Return on Equity ("ROE") proposed by PPL results in a fair Rate of Return ("ROR"); and
- g) Whether PPL's claimed Cost of Service Study ("COSS") is accurate, legitimate and appropriately allocated.

PPLICA anticipates pursuing these issues during this proceeding and reserves the right to raise further issues and to respond to all issues raised by other parties.

IV. PROPOSED WITNESSES

PPLICA expects to sponsor testimony in this proceeding regarding the aforementioned issues and will immediately inform the parties and the ALJs of its intended witnesses and topics of testimony. PPLICA also intends to participate in this proceeding through the submission of

discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

V. PROPOSED SCHEDULE AND DISCOVERY RULES

PPLICA does not oppose the partial procedural schedule contained in the October 23, 2025, Prehearing Conference Order and will cooperate with the ALJs and the parties at the Prehearing Conference to finalize an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any directives issued by the ALJs. Additionally, PPLICA will defer to the other parties at the Prehearing Conference regarding the amount of hearing time needed and the need for public input hearings.

VI. POSSIBILITY OF SETTLEMENT

PPLICA is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Dated: October 31, 2025