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October 31, 2025

VIA ELECTRONIC FILING

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

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

Dear Secretary Homsher:

Enclosed for filing please find the Prehearing Conference Memorandum of the Coalition for Community Solar Access and the Solar Energy Industries Association (the "Joint Solar Advocates") in the above-captioned proceeding.

Copies are being served in accordance with the attached Certificate of Service. Please contact me with any questions or concerns.

Very truly yours,



Alan M. Seltzer

AMS/psm
Enclosure
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

PPL Electric Utilities Corporation

Docket Nos.

R-2025-3057164

C-2025-3057844

C-2025-3057889

C-2025-3057946

**PREHEARING CONFERENCE MEMORANDUM OF
SOLAR ENERGY INDUSTRIES ASSOCIATION AND THE COALITION FOR
COMMUNITY SOLAR ACCESS**

**TO THE HONORABLE DEPUTY CHIEF ADMINISTRATIVE LAW CHRISTOPER P.
PELL AND THE HONORABLE ADMINISTRATIVE LAW BARBARA SHADIE
NAUSE:**

The Solar Energy Industries Association and the Coalition for Community Solar Access (“SEIA and CCSA”, together the “Joint Solar Advocates”) hereby submit this Prehearing Conference Memorandum in accordance with 52 Pa. Code § 5.222 of the regulations of the Pennsylvania Public Utility Commission (“PaPUC” or “Commission”) and the October 23, 2025 Prehearing Order of Deputy Chief Administrative Law Judge Christoper P. Pell (“ALJ”) and ALJ Barbara Shadie Nause (together, the “ALJs”) in connection with the telephonic Prehearing Conference to be held on November 5, 2025 at 9:00 a.m.

I. PROCEDURAL HISTORY

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” or the “Company”) filed Original Tariff Electric – Pa. P.U.C. No. 202 (“Tariff No. 202”) with the Commission.

Among other things, PPL's Tariff No. 202 proposes to increase the Company's annual distribution revenue by approximately \$356 million, or approximately 33.42%. In addition, the Company is proposing to assign default supply customers on the Generation Supply Charge ("GSC") to Rate GSC-1 and Rate GSC-2 based on their maximum registered peak load, as defined by the Company's proposed tariff filed in this proceeding. This new approach is discussed by Company witness Andrew Castanaro PPL Statement No. 15.

On October 6, 2025, the Commission on Economic Opportunity ("CEO") filed a Petition to Intervene in this proceeding. Also on October 6, 2025, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") filed a Formal Complaint, which has been docketed at C-2025-3057844.

On October 9, 2025, the Office of Small Business Advocate ("OSBA") filed a Formal Complaint, Public Statement, and Verification. The OSBA Complaint was docketed at C-2025-3057889. Also on October 9, 2025, Michael A. Podskoch, Jr. and Adam J. Williams entered a Notice of Appearance on behalf of the Commission's Bureau of Investigation and Enforcement ("I&E").

On October 12, 2025, Brad and Jennifer Wooley filed a Formal Complaint against the proposed rate increase, which was docketed at C-2025-305794.

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 "CGC") filed a Petition to Intervene in this proceeding.

On October 23, 2025, the Commission directed that, pursuant to Section 1308(d) of the Public Utility Code, 66 Pa. C.S. §1308(d), PPL's Tariff No. 202 be suspended and set for investigation.

On October 27, 2025, the Joint Solar Advocates filed with the Commission a Petition to Intervene ("Petition") in this proceeding. Action on the Petition is pending before the ALJs assigned to the proceedings. The Joint Solar Advocates anticipate filing a Formal Complaint against the PPL's Tariff No. 202 prior to the scheduled prehearing conference.

On October 28, 2025, Clean Air Council, Vote Solar, and the Union of Concerned Scientists (collectively, the "Energy Justice Advocates") filed a Petition to Intervene and Protest in this proceeding. Also on October 28, 2025, Dimension PA 1 LLC filed a Petition to Intervene in this proceeding.

On October 29, 2025, the Environmental Defense Fund, Natural Resources Defense Council, and Citizens for Pennsylvania's Future (collectively, the "Environmental Petitioners") filed a Petition to Intervene. Also on October 29, 2025, the CGC filed a Motion to Amend Petition to Intervene to update the list of participating entities in the CGC.

II. Counsel

The Joint Solar Advocates are represented in this proceeding by the following counsel:

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III. PROCEDURAL SCHEDULE, ISSUES AND WITNESSES

Schedule: The Joint Solar Advocates do not object to the procedural schedule proposed by the Public Advocates and CAUSE-PA.

Issues: Recognizing that the Joint Solar Advocates' evaluation of PPL's rate filing is ongoing, they have preliminarily identified the following issues, which will be refined during the course of their review and this proceeding:

1) Whether PPL's base rate filing, which proposes tariff revisions, among other things, designed to change the rate classification of a targeted category of customers, *i.e.*, customer-generators, is just, reasonable, lawful, non-discriminatory and fair.

2) Whether what PPL characterizes as "no load" net-metering customers and installations that have substantial generation output and negligible demand should be treated like large commercial and industrial customers due to their impacts on infrastructure, financial investment and the grid.

¹ Mr. Seltzer will speak on behalf of the Joint Solar Advocates at the November 5, 2025, Prehearing Conference.

3) Whether PPL’s proposed revision to the definition of “maximum registered peak load” in its tariff to account for not only peak demand, but also peak export, is just, reasonable, lawful, non-discriminatory and fair.

4) Whether PPL’s proposed tariff may increase the demand charges for electric service paid by customer-generators and whether such a proposal is just, reasonable, lawful, non-discriminatory and fair.

5) Whether the proposed transfer of Alternative Energy Credit ownership to PPL in certain circumstances violates the provisions of the Alternative Energy Portfolio Standards (“AEPS”) Act, *see* 73 P.S. §§ 1648.1 – 1648.8 AEPS Act, and is otherwise unfair, unreasonable, and discriminatory.

6) Whether certain of PPL’s proposed tariff and rate classification changes with respect to customer-generators (a) violate the AEPS Act and 66 Pa.C.S. § 2814 and related caselaw; (b) violate certain requirements of the Public Utility Code and the Commission’s regulations; and (c) are unjust, unreasonable and not in the public interest.

Witnesses: At this time the Joint Solar Advocates expect to present Kevin Lucas, Vice President of Policy Analysis for SEIA. As the list of witnesses to be presented is refined and finalized, the ALJs and counsel for other active parties will be advised.

IV. SETTLEMENT

The Joint Solar Advocates will participate in any settlement discussions aimed toward eliminating or reducing the issues in dispute.

V. PUBLIC INPUT HEARINGS

The Joint Solar Advocates have no objection to the Public Advocates' position regarding Public Input hearings.

VI. DISCOVERY RULE MODIFICATIONS

The Joint Solar Advocates do not object to the shortening of discovery due dates proposed by the Public Advocates. Consistent with that position, the Joint Solar Advocates request that (i) the twenty (20) day notice provision provided in 52 Pa. Code § 5.343(a) regarding notice of deposition to active parties and the presiding officer be reduced to ten (10) days and (ii) the ten (10) day period provided in 52 Pa. Code § 5.343(f) for objections to a notice of deposition be shortened to five (5) days. Regardless of these requested modifications, which would expedite the completion of discovery, the Parties would retain their ability to mutually agree to different time frames associated with the deposition process in accordance with 52 Pa. Code § 5.322 (Informal agreement regarding discovery or deposition procedure).

Respectfully submitted,



Date: October 31, 2025

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*Counsel for Solar Energy Industries Association
and the Coalition for Community Solar Access*

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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Dated: October 31, 2025

Alan M. Seltzer