



October 31, 2025

**VIA E-FILING**

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

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

Dear Secretary Homsher,

Please find enclosed the Prehearing Conference Memorandum of the Energy Justice Advocates. As indicated on the attached Certificate of Service, service on the parties was accomplished by email only. Should you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,

*/s/ Devin McDougall*

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Supervising Senior Attorney  
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(267) 690-5595

*Counsel for the Energy Justice Advocates*

cc.

The Honorable Christopher P. Pell  
The Honorable Barbara Shadie Nause  
Service List

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et al.

v.

PPL Electric Utilities Corporation

R-2025-3057164  
C-2025-3057844  
C-2025-3057889  
C-2025-3057946

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the following document upon the parties of record to this proceeding, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party) in the manner and upon the persons listed below.

Service By Email Only

<p>Kimberly A. Klock, Esq. Michael J. Shafer, Esq. PPL Services Corporation 645 Hamilton Street, Suite 700 Allentown, PA 18104 <a href="mailto:kklock@pplweb.com">kklock@pplweb.com</a> <a href="mailto:mjshafer@pplweb.com">mjshafer@pplweb.com</a></p>	<p>David B. MacGregor, Esq. Garrett P. Lent, Esq. Post &amp; Schell, P.C. 17 North Second Street 12th Floor Harrisburg, PA 17101-1601 <a href="mailto:dmacgregor@postschell.com">dmacgregor@postschell.com</a> <a href="mailto:glent@postschell.com">glent@postschell.com</a></p>
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<p>Rebecca Lyttle, Esq. Steven C. Gray, Esq. Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101 <a href="mailto:relyttle@pa.gov">relyttle@pa.gov</a> <a href="mailto:sgray@pa.gov">sgray@pa.gov</a></p>	<p>Christy M. Appleby, Esq. Harrison W. Breitman, Esq. Jacob D. Guthrie, Esq. Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923 <a href="mailto:OCA25PPLBRC@paoca.org">OCA25PPLBRC@paoca.org</a></p>

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Dated: October 31, 2025

*/s/ Devin McDougall*  
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*Counsel for the Energy Justice Advocates*

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**PREHEARING CONFERENCE MEMORANDUM  
OF THE ENERGY JUSTICE ADVOCATES**

**October 31, 2025**

## **I. Introduction and Procedural History**

On September 30, 2025, PPL Electric Utilities Corporation (“PPL”) submitted a rate filing, PPL Original Tariff Electric – Pa. P.U.C. No. 202, to the Pennsylvania Public Utility Commission (“Commission”) seeking a general rate increase of approximately \$356 million, or 33.42%, over existing revenues (the “2025 Rate Filing”).

On October 22, 2025, the Commission initiated this proceeding (“Proceeding”) to investigate the justness and reasonableness of the rate increase and other changes proposed in PPL’s 2025 Rate Filing at the above-captioned docket number.<sup>1</sup>

On October 23, 2025, Administrative Law Judges (“ALJs”) Christopher P. Pell and Barbara Shadie Nause issued a Prehearing Conference Order setting the date of a prehearing conference in the above-captioned proceeding for 9:00 am on November 5, 2025 and directing parties to file a prehearing conference memorandum by October 31, 2025.<sup>2</sup>

On October 28, 2025, Clean Air Council, Vote Solar, and the Union of Concerned Scientists (collectively, the “Energy Justice Advocates” or “EJA”) submitted a Protest and Petition to Intervene in this Proceeding.

Pursuant to the Prehearing Conference Order, the Energy Justice Advocates respectfully submit this memorandum.

## **II. Proposed Plan and Schedule for Discovery**

The Energy Justice Advocates support the discovery modifications proposed by the Office of the Consumer Advocate (“OCA”). EJA also join OCA’s requests that (1) OCA’s

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<sup>1</sup> Order, *Pennsylvania Pub. Util. Comm’n, et al. v. PPL Electric Utilities Corporation*, PA PUC Docket Nos. R-2025-3057164 et al. (Oct. 23, 2025).

<sup>2</sup> Prehearing Conference Order, *Pennsylvania Pub. Util. Comm’n, et al. v. PPL Electric Utilities Corporation*, PA PUC Docket Nos. R-2025-3057164 et al. (Oct. 23, 2025).

requested discovery modifications take effect when addressed during the prehearing conference on November 5, 2025; and (2) any discovery requests pending as of the time of the prehearing conference be due no later than 10 calendar days following the prehearing conference if they would otherwise be due later than that under the Commission's default discovery regulations.

### **III. Possibility of Settlement**

The Energy Justice Advocates are ready to engage in settlement discussions with any party to resolve or narrow the issues in this Proceeding.

### **IV. Issues**

The Energy Justice Advocates are continuing to review PPL's 2025 Rate Filing and anticipate investigating its basis through discovery in this Proceeding.

On preliminary review of PPL's 2025 Rate Filing, EJA object to its approval on the grounds that PPL has not sufficiently demonstrated that approval of its 2025 Rate Filing would be just and reasonable, consistent with the Commonwealth's laws and policies, and consistent with sound ratemaking principles.

EJA are concerned that PPL's 2025 Rate Filing could result in unjust and unreasonable rates, may be inconsistent with the law and policies of the Commonwealth, and may be contrary to sound ratemaking principles. If PPL's rate increase is approved in its entirety, the monthly bill of a typical PPL residential customer receiving default service and using 1,000 kilowatt-hours (kWh) per month would increase from \$191.49 to \$204.86, or by 6.98%, which raises concerns about affordability. Additionally, it has been over 10 years since PPL's last rate increase request, which raises concerns about rate shock.

EJA are concerned that PPL's 2025 Rate Filing may not:

- reflect best practices to control capital and operating costs, minimize the need for rate increases, and protect affordability for all customer classes in the long-term;
- reflect adequate measures to ensure that any rate increase resulting from this Proceeding is no larger than necessary and is equitably distributed among customer classes; and
- reflect best practices for planning, building out, and operating its distribution infrastructure in a manner consistent with ensuring equitable and affordable access for all customer classes to the benefits of clean energy.

EJA reserves the right to raise and address such additional issues relating to PPL's 2025 Rate Filing as may arise on further review, analysis, and discovery.

#### **V. Amount of Hearing Time Needed**

In the event that PPL, the Energy Justice Advocates, and other parties to this Proceeding are unable to resolve issues through settlement, EJA respectfully submit that the outstanding issues should be adequately analyzed and addressed on the record during hearings. EJA anticipates that the amount of hearing time needed will be shaped by the issues remaining for adjudication.

#### **VI. Witnesses**

The Energy Justice Advocates intend to present the following expert technical witness to address the issues identified above, as well as any other issues that may arise in the course of the Proceeding:

Karl R. Rábago  
Rábago Energy  
1350 Gaylord St.  
Denver, CO 80206  
(512) 968-7543  
[karl@rabagoenergy.com](mailto:karl@rabagoenergy.com)

EJA intend to serve direct testimony from Mr. Rábago, and may serve rebuttal and surrebuttal testimony as warranted.

## VII. Procedural Schedule

EJA are currently engaged in discussions with other parties to this Proceeding concerning a mutually-agreeable procedural schedule. EJA are agreeable to the below procedural schedule as proposed by CAUSE-PA, provided that EJA's technical expert, Mr. Rábago, be permitted to participate in the evidentiary hearing by teleconference. Due to prior travel plans, Mr. Rábago will be in Mexico from February 16, 2026 to February 28, 2026.

Direct	Monday, December 22, 2025
Rebuttal	Friday, January 23, 2026
Surrebuttal	Monday, February 9, 2026
Written/Oral Rejoinder	Friday, February 13, 2026
Hearings	Week of February 17, 2026
Main Brief	Tuesday, March 10 2026
Reply Brief	Friday, March 20, 2026
Last Public Meeting Date	Thursday, June 18, 2026
End of Suspension Date:	Wednesday, July 1, 2026

## **VIII. Public Input Hearings**

The Energy Justice Advocates will be prepared to discuss public input hearings at the prehearing conference. In light of the amount of the requested rate increase, the size of the service territory, and the numerous complex issues involved in this Proceeding, EJA supports the convening of at least six public input hearings, including both in-person and telephonic hearings, to increase accessibility to the public.

## **IX. Counsel and Service**

The Energy Justice Advocates are represented in this matter by:

Devin McDougall, Esq.  
PA Attorney ID No. 329855  
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Philadelphia, PA 19103  
[dmcDougall@earthjustice.org](mailto:dmcDougall@earthjustice.org)

EJA consent to receive service of documents in this Proceeding by electronic mail as provided in 52 Pa. Code § 1.54(b)(3).

Pursuant to 52 Pa. Code § 1.55(b), service on EJA may be made on the following individual, who will also serve as lead for EJA during the Prehearing Conference:

Devin McDougall, Esq.  
PA Attorney ID No. 329855  
Supervising Senior Attorney  
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Philadelphia, PA 19103  
[dmcDougall@earthjustice.org](mailto:dmcDougall@earthjustice.org)

As a courtesy, EJA respectfully request that any documents they are served by electronic mail be served upon the following additional individuals at the email addresses indicated:

Logan Welde, Esq.

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[karl@rabagoenergy.com](mailto:karl@rabagoenergy.com)

## X. Conclusion

Pursuant to the Prehearing Conference Order, the Energy Justice Advocates respectfully submit this Prehearing Conference Memorandum.<sup>3</sup>

Dated: October 31, 2025

Respectfully submitted,

/s/ Devin McDougall

PA Attorney ID No. 329855

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<sup>3</sup> Prehearing Conference Order, *Pennsylvania Pub. Util. Comm'n, et al. v. PPL Electric Utilities Corporation*, PA PUC Docket Nos. R-2025-3057164 et al. (Oct. 23, 2025).