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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 (“Commission” or “PUC”) is the Prehearing Memorandum on behalf of Convergent Energy and Power LP (“Convergent”), 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 that reads 'Susan E. Bruce'.

Susan E. Bruce
MCNEES WALLACE & NURICK LLC

Counsel to Convergent Energy and Power LP

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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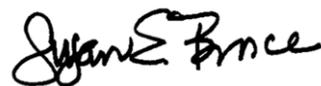
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Susan E. Bruce

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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 CONVERGENT ENERGY AND POWER LP**

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, Convergent Energy and Power LP (“Convergent”) 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%, and certain modifications to its Tariff, including extensive changes to Rules 6 and 12, which pertain to standby service for non-utility generating facilities [and distributed energy resource interconnection service, respectively.

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.

Concurrently with the filing of this Prehearing Memorandum, Convergent is filing a Complaint in this proceeding. A description of Convergent is set forth in Paragraph 4 of Convergent's Complaint.

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

II. IDENTIFICATION OF LEAD ATTORNEY

For purposes of the Prehearing Conference, Susan E. Bruce will speak as the lead attorney on behalf of Convergent.

III. ANTICIPATED ISSUES AND SUB-ISSUES

Convergent's preliminary review of the Company's filing indicates a need for Commission investigation into whether PPL's tariff rules facilitate customer-side development of behind-the-meter non-exporting battery energy storage systems ("Non-exporting Battery Storage") and are just, reasonable, and non-discriminatory. Convergent anticipates pursuing these issues during this proceeding and reserves the right to raise additional issues and to respond to all issues raised by other parties.

IV. PROPOSED WITNESSES

Convergent expects to sponsor testimony in this proceeding regarding the aforementioned issues and will immediately inform the ALJs and the parties of its intended witnesses and topics of testimony. Convergent 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

Convergent 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

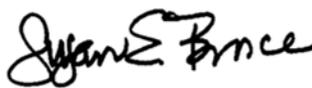
Prehearing Conference to finalize an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any directives issued by the ALJs. Additionally, Convergent will defer to the other parties at the Prehearing Conference regarding the amount of hearing time needed and the need for public input hearings.

VI. POSSIBILITY OF SETTLEMENT

Convergent 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