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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 Complaint 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

Counsel to the PP&L Industrial Customer
Alliance

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PP&L INDUSTRIAL CUSTOMER ALLIANCE :
 :
 v. : DOCKET NOS. R-2025-3057164
 : C-2025-_____
PPL ELECTRIC UTILITIES CORPORATION :

COMPLAINT

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Section 701 of the Pennsylvania Public Utility Code, 66 Pa. C.S. § 701, and Sections 5.21 and 5.22 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") regulations, 52 Pa. Code §§ 5.21 & 5.22, the PP&L Industrial Customer Alliance ("PPLICA") hereby submits the following Complaint against PPL Electric Utilities Corporation's ("PPL" or "Company") proposed Original Tariff Electric Pa. P.U.C. No. 202 ("Tariff No. 202") and proposed Original Tariff Electric – Pa. P.U.C. No. 2S ("Tariff No. 2S). In support thereof, PPLICA states the following:

1. The Complainant is PPLICA, the membership of which is listed in Appendix A attached hereto. PPLICA will update Appendix A throughout the course of this proceeding, as necessary.

2. The names and address of Complainants' attorneys are:

Adeolu A. Bakare (I.D. No. 208541)
Victoria A. Geddis (I.D. No. 335500)
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PPLICA requests that the names and address of its attorneys be added to the Commission's official service list, and that all correspondence in this proceeding from the Commission be directed to the attention of Adeolu A. Bakare at the address listed above.

3. The Respondent utility is:

PPL Electric Utilities Corporation
Two North Ninth Street
Allentown, PA 18101-1179

4. On September 30, 2025, PPL filed with the Commission Original Tariff Electric – Pa. P.U.C. No. 202 proposed to become effective on December 1, 2025. By this filing, PPL requested a distribution rate increase of approximately \$356.3 million, or 33.42% over the Company's present annual distribution revenues, and a proposed Return on Equity ("ROE") of 11.30%. If approved, the Company's distribution rate increase request would produce a rate increase for Large General Service at 12,470 Volts ("LP-4") while producing a slight rate decrease for Large General Service at 69,000 Volts or Higher ("LP-5") customers. In addition to the proposed rates, PPL's Tariff No. 202 proposes numerous changes to the terms and conditions in PPL's current tariff. Additionally, PPL filed proposed Original Tariff Electric – Pa. P.U.C. No. 2S, which is the Company's proposed Electric Generation Supplier Coordination Tariff and sets forth the Company's rules, regulations, charges, and riders for its provision of coordination services to electric generation suppliers ("EGSs"). In support of Tariff No. 202 and Tariff No. 2S, PPL filed and served supporting testimony that purports to validate the Company's claim for a \$356.3 million distribution rate increase and the other elements of its proposal.

5. 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 and Tariff No. 2S.

6. This Complaint is filed in general opposition to the rates, terms and provisions contained in PPL's Tariff No. 202.

7. PPLICA is an *ad hoc* association of energy-intensive industrial customers receiving electric service in PPL's service territory. PPLICA members purchase service from PPL primarily under Rate Schedules LP-4 and LP-5, as well as available riders. PPLICA members collectively consume over 971 million kWh of electricity annually in manufacturing and other operational processes, and electric costs comprise a significant portion of their production costs. PPLICA was an active Party in PPL's Restructuring Proceeding pursuant to the Competition Act, during which the Company's initial unbundled distribution and transmission rates were established, as well as PPL's 2004, 2007, 2010, 2012, and 2015 Distribution Base Rate proceedings. As PPL's largest retail customers, the Commission's disposition of PPL's distribution base rate filing will change the distribution rates paid by PPLICA members.

8. Complainant alleges that the information and data filed in support of the proposed rates and tariff revisions in PPL's Tariff No. 202 are insufficient to establish that the proposed rates are just, reasonable and nondiscriminatory, as required by Sections 1301 and 1304 of the Public Utility Code, 66 Pa. C.S. §§ 1301 & 1304.

9. Pursuant to Section 315(a) of the Public Utility Code, 66 Pa. C.S. § 315(a), PPL has the burden of proving that its proposed rates are just and reasonable and otherwise in accord with Section 1301 of the Public Utility Code, 66 Pa. C.S. § 1301.

10. PPLICA's preliminary review of the Company's filing indicates the 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% ROE proposed by PPL results in a fair Rate of Return ("ROR");
- g) Whether PPL's claimed Cost of Service Study ("COSS") is accurate, legitimate and appropriately allocated;

11. PPLICA reserves the right to raise and address other issues of concern upon further examination of PPL's filing and to respond to issues raised by other parties during the course of the proceeding.

12. PPLICA respectfully requests that the Commission provide the following relief:

- a) Allow PPLICA to participate in this proceeding with full party status;
- b) Consolidate PPLICA's Complaint with the Commission's investigation into PPL's Tariff No. 202 and Tariff No. 2S;
- c) Require PPL at hearings to adduce substantial evidence to justify and substantiate its proposed rate changes and tariff revisions, and provide PPLICA with full opportunity to cross-examine PPL's witnesses, present evidence and offer argument on its own behalf.

WHEREFORE, the PP&L Industrial Customer Alliance respectfully requests that PPL Electric Utilities Corporation be required to answer this Complaint and that, upon a final hearing, the Pennsylvania Public Utility Commission make such order as it deems necessary and appropriate.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Counsel to the PP&L Industrial Customer Alliance

Dated: October 31, 2025

APPENDIX A

**MEMBERSHIP OF THE
PP&L INDUSTRIAL CUSTOMER ALLIANCE**

Air Products and Chemicals, Inc.

Benton Foundry

Hercules Cement Company

Hydro Extrusions, Inc.

Messer LLC

TIMET North America