



November 3, 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 Petition to Intervene and Protest of POWER Interfaith and Physicians for Social Responsibility Pennsylvania (“PSR PA”), who intend to join the Energy Justice Advocates (“EJA”) client group represented in the above-captioned proceeding by Earthjustice.

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

PA Attorney ID No. 329855

Supervising Senior Attorney

Earthjustice

1617 John F. Kennedy Blvd., Suite 2020

Philadelphia, PA 19103

dmcDougall@earthjustice.org

(267) 690-5595

Counsel for POWER Interfaith and PSR PA

cc:

The Honorable Christopher P. Pell
The Honorable Barbara Shadie Nause
Certificate of Service

**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 kklock@pplweb.com mjshafer@pplweb.com</p>	<p>David B. MacGregor, Esq. Garrett P. Lent, Esq. Post & Schell, P.C. 17 North Second Street 12th Floor Harrisburg, PA 17101-1601 dmacgregor@postschell.com glent@postschell.com</p>
<p>Devin T. Ryan, Esq. Alice A. Wade, Esq. Hayley E. Wilburn, Esq. Post & Schell, P.C. One Oxford Centre 301 Grant Street, Suite 3010 Pittsburgh, PA 15219 dryan@postschell.com</p>	<p>Michael A. Podskoch, Jr., Esq. Adam J. Williams, Esq. Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 mpodskoch@pa.gov adawilliam@pa.gov</p>
<p>Rebecca Lyttle, Esq. Steven C. Gray, Esq. Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101 relyttle@pa.gov sgray@pa.gov</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 OCA25PPLBRC@paoca.org</p>

Joseph L. Vullo, Esq. Burke Vullo Reilly Roberts 1460 Wyoming Avenue Forty Fort, PA 18704 jlvullo@bvrrlaw.com	Jennifer Woolley 2914 Hodle Ave. Easton, PA 18045-8103 jwoolley4@rcn.com
Daniel A. Garcia, Esq. Brian Pulito, Esq. Steptoe & Johnson, PLLC 1 PPG Place Pittsburgh, PA 15222 Daniel.garcia@Steptoe-Johnson.com Brian.Pulito@Steptoe-Johnson.com	Alan M. Seltzer, Esq. John F. Povilaitis, Esq. Buchanan Ingersoll & Rooney PC 409 N. Second Street, Suite 500 Harrisburg, PA 17101 alan.seltzer@bipc.com john.povilaitis@bipc.com
Ria M. Pereira, Esq. Elizabeth R Marx, Esq. John W. Sweet, Esq. Lauren N. Berman, Esq. Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 PULP@pautilitylawproject.org	Daniel B. Markind, Esq. Flaster Greenberg, PC 1717 Arch Street, Suite 3300 Philadelphia, PA 19103 Daniel.markind@flastergreenberg.com

Dated: November 3, 2025

/s/ Devin McDougall

PA Attorney ID No. 329855

Supervising Senior Attorney

Earthjustice

1617 John F. Kennedy Blvd., Suite 2020

Philadelphia, PA 19103

(267) 690-5595

dmcDougall@earthjustice.org

Counsel for POWER Interfaith and PSR PA

**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

**PETITION TO INTERVENE AND PROTEST OF
POWER INTERFAITH AND
PHYSICIANS FOR SOCIAL RESPONSIBILITY PENNSYLVANIA**

November 3, 2025

Pursuant to 52 Pa. Code §§ 5.72-5.75 and §§ 5.51-5.53, POWER Interfaith and Physicians for Social Responsibility Pennsylvania (“PSR PA”), who intend to join the Energy Justice Advocates client group represented in the above-captioned proceeding (the “Proceeding”) by Earthjustice, hereby respectfully submit this Petition to Intervene and Protest. In support thereof, POWER Interfaith and PSR PA state as follows:

I. Background

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

2. On October 22, 2025, the Commission initiated this 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.

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

4. If the Petition to Intervene of POWER Interfaith and PSR PA is granted, they intend to join the EJA client group represented by Earthjustice, participating in the presentation of a single set of testimony and briefing from EJA.

II. Eligibility to Intervene and Standing

5. The Commission's regulations provide that "[a] petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought."¹ A "person" includes a corporation and an association.²

6. Under 52 Pa. Code § 5.72(a)(2), a person meets eligibility criteria for intervention if it has "[a]n interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding."³

7. Under 52 Pa. Code § 5.72(a)(3), a person can also meet eligibility criteria for intervention if it has "another interest of such nature that participation of the petitioner may be in the public interest."⁴

A. POWER Interfaith

8. POWER Interfaith meets the eligibility criteria of 52 Pa. Code § 5.72(a)(2), since it will be directly affected by the Proceeding, its interests are not adequately represented by existing parties in the Proceeding, and its participation in the Proceeding would be in the public interest.

¹ 52 Pa. Code § 5.72(a).

² 52 Pa. Code § 1.8(a); *See also Energy Conservation Council of Pennsylvania v. Pub. Util. Comm'n*, 995 A.2d 465, 476 (Pa. Commw. Ct. 2010) ("An association may have standing as a representative of its members...Thus, as long as an organization 'has at least one member who has or will suffer a direct, immediate, and substantial injury to an interest as a result of the challenged action[, i.e., is aggrieved, the organization] has standing.") (internal citation omitted).

³ 52 Pa. Code § 5.72(a)(2).

⁴ 52 Pa. Code § 5.72(a)(3).

9. POWER Interfaith, founded in 2010, is a Pennsylvania not-for-profit network of faith communities in Pennsylvania that is committed to racial and economic justice on a livable planet. POWER Interfaith represents over 50 unique congregations in Southeastern and Central Pennsylvania.

10. POWER Interfaith uses its faith and moral grounding to organize and empower Pennsylvanians to live and work together so that the presence of the Divine is known on every block, that people work together to transform the conditions of their neighborhood, and that life flourishes for all.

11. Members of POWER Interfaith will be directly impacted by this proceeding and bound by the Commission's action in it. Members of POWER Interfaith live within PPL's service territory, are customers of PPL, and will be subject to the outcome of this proceeding, including through impacts to their electric bills and the reliability, quality, and safety of their electric service.

12. POWER Interfaith has an interest in ensuring that PPL's rates are just and reasonable, including with respect to affordability, sustainability, and the emerging issues relating to costs associated with large load customers. POWER Interfaith's interests in these areas would not be adequately represented by existing parties in this proceeding.

13. Additionally, POWER Interfaith also meets the eligibility criteria of 52 Pa. Code § 5.72(a)(3) because it would serve the public interest for POWER Interfaith to participate in this Proceeding. As the Commission has recognized, active participation by public interest

organizations aids the Commission in protecting the public’s welfare and advancing the public interest.⁵

14. POWER Interfaith is a long-standing 501(c)(3) nonprofit public interest organization with expertise on energy issues. POWER Interfaith has also participated as a party in numerous recent Commission proceedings, in which it helped develop the record through submitting expert testimony and contributed to the development of settlement agreements approved as in the public interest by the Commission.⁶

B. Physicians for Social Responsibility Pennsylvania

15. PSR PA meets the eligibility criteria of 52 Pa. Code § 5.72(a)(2), since it will be directly affected by the Proceeding, its interests are not adequately represented by existing parties in the Proceeding, and its participation in the Proceeding would be in the public interest.

16. PSR PA is a public health nonprofit advancing its mission through programs focused on health, environmental justice, and youth empowerment. Supported by health professionals who advocate for and confront the root causes of environmental and health inequities, PSR PA is committed to protecting communities across our region.

17. Members of PSR PA will be directly impacted by this proceeding and bound by the Commission’s action in it. Members of PSR PA live within PPL’s service territory, are

⁵ As the Commission has noted, “In the context of a general rate increase case such as this one, the Commission is aided by the active participation of entities representing various subgroups of the entire public. A number of these active participants have a statutorily imposed obligation to provide this representation, while others are self-created entities choosing to represent a delineated subgroup. Taken as a whole, these active participants cover the entire spectrum of the public whose welfare is to be protected.” Opinion and Order, *Pennsylvania Pub. Util. Comm’n, et al. v. UGI Utils., Inc. – Elec. Div.*, PA PUC Docket Nos. C-2021-3024200 et al., at *20–21 (Oct. 28, 2021).

⁶ See, e.g., Opinion and Order, *Pennsylvania Pub. Util. Comm’n, et al. v. Philadelphia Gas Works*, PA PUC Docket Nos. R-2025-3053112 et al. (Oct. 9, 2025) (approving settlement, to which POWER Interfaith was a party, of PGW rate case); Opinion and Order, *Petition of PECO Energy Company for Approval of Its Default Service Program for the Period From June 1, 2025, Through May 31, 2029*, PA PUC Docket No. P-2024-3046008 et al. (Nov. 7, 2024) (approving settlement, to which POWER Interfaith was a party, of PECO default service program case).

customers of PPL, and will be subject to the outcome of this proceeding, including through impacts to their electric bills and the reliability, quality, and safety of their electric service.

18. PSR PA has an interest in ensuring that PPL's rates are just and reasonable, including with respect to affordability, sustainability, and the emerging issues relating to costs associated with large load customers. PSR PA's interests in these areas would not be adequately represented by existing parties in this proceeding.

19. Additionally, PSR PA also meets the eligibility criteria of 52 Pa. Code § 5.72(a)(3) because it would serve the public interest for PSR PA to participate in this Proceeding. As the Commission has recognized, active participation by public interest organizations aids the Commission in protecting the public's welfare and advancing the public interest.⁷

20. PSR PA is a long-standing 501(c)(3) nonprofit public interest organization with expertise on energy issues. PSR PA has also participated as a party in numerous recent Commission proceedings, in which it helped develop the record through submitting expert testimony and contributed to the development of settlement agreements approved as in the public interest by the Commission.⁸

⁷ As the Commission has noted, "In the context of a general rate increase case such as this one, the Commission is aided by the active participation of entities representing various subgroups of the entire public. A number of these active participants have a statutorily imposed obligation to provide this representation, while others are self-created entities choosing to represent a delineated subgroup. Taken as a whole, these active participants cover the entire spectrum of the public whose welfare is to be protected." Opinion and Order, *Pennsylvania Pub. Util. Comm'n, et al. v. UGI Utils., Inc. – Elec. Div.*, PA PUC Docket Nos. C-2021-3024200 et al., at *20–21 (Oct. 28, 2021).

⁸ See, e.g., Opinion and Order, *Pennsylvania Pub. Util. Comm'n, et al. v. Philadelphia Gas Works*, PA PUC Docket Nos. R-2025-3053112 et al. (Oct. 9, 2025) (approving settlement, to which PSR PA was a party, of PGW rate case); Opinion and Order, *Petition of PECO Energy Company for Approval of Its Default Service Program for the Period From June 1, 2025, Through May 31, 2029*, PA PUC Docket No. P-2024-3046008 et al. (Nov. 7, 2024) (approving settlement, to which PSR PA was a party, of PECO default service program case).

III. Positions Regarding the Issues in the Proceeding

21. POWER Interfaith and PSR PA adopt, and incorporate by reference as if fully set forth herein, the positions regarding the issues of the Energy Justice Advocates in their Petition to Intervene and Protest filed in this Proceeding on October 28, 2025.⁹

22. For purposes of the Prehearing Conference, POWER Interfaith and PSR PA adopt the positions of the Energy Justice Advocates in their Prehearing Conference Memorandum filed in this Proceeding on October 31, 2025.¹⁰

IV. Counsel

23. POWER Interfaith and PSR PA are represented in this matter by:

Devin McDougall, Esq.
PA Attorney ID No. 329855
Supervising Senior Attorney
Clean Energy Program
Earthjustice
1617 John F. Kennedy Blvd., Suite 2020
Philadelphia, PA 19103
(267) 690-5595
dmcdougall@earthjustice.org

24. POWER Interfaith and PSR PA consent to receive electronic service of documents as provided in 52 Pa. Code § 1.54(b)(3).

⁹ Petition to Intervene and Protest of the Energy Justice Advocates, *Pennsylvania Pub. Util. Comm'n, et al. v. PPL Electric Utilities Corporation*, PA PUC Docket Nos. R-2025-3057164 et al. (Oct. 28, 2025).

¹⁰ Prehearing Conference Memorandum of the Energy Justice Advocates, *Pennsylvania Pub. Util. Comm'n, et al. v. PPL Electric Utilities Corporation*, PA PUC Docket Nos. R-2025-3057164 et al. (Oct. 31, 2025).

V. Conclusion

WHEREFORE, POWER Interfaith and PSR PA respectfully submit this Petition to Intervene and Protest and respectfully request that the Commission grant them status as full parties to this Proceeding and such other relief as may be just and reasonable.

Dated: November 3, 2025

Respectfully submitted,

/s/ Devin McDougall

PA Attorney ID No. 329855

Supervising Senior Attorney

Earthjustice

1617 John F. Kennedy Blvd., Suite 2020

Philadelphia, PA 19103

dmcDougall@earthjustice.org

(267) 690-5595

Counsel for POWER Interfaith and PSR PA

VERIFICATION

I hereby verify that the facts contained in the foregoing Petition to Intervene and Protest are true and accurate to the best of my knowledge, information, and belief, that I am duly authorized to make this verification, and that I expect to be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: November 3, 2025

/s/ Devin McDougall
PA Attorney ID No. 329855
Supervising Senior Attorney
Earthjustice
1617 John F. Kennedy Blvd., Suite 2020
Philadelphia, PA 19103
dmcDougall@earthjustice.org
(267) 690-5595

Counsel for POWER Interfaith and PSR PA