



DEPARTMENT OF THE ARMY
UNITED STATES ARMY LEGAL SERVICES AGENCY
9275 GUNSTON ROAD
FORT BELVOIR, VIRGINIA 22060-5546

REPLY TO
ATTENTION OF
Lt. Colonel Carlos S. Ramirez

November 4, 2025

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

via Electronic Filing/e-Mail

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

Secretary Homsher:

Attached for filing with the Pennsylvania Public Utility Commission (Commission) in Docket No. R-2025-3057164 is the *Petition to Intervene of the United States Department of Defense and all other Federal Executive Agencies* (DOD/FEA). This document is being filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the attached Certificate of Service.

Please contact me or my colleague, US Army regulatory law attorney John Joseph McNutt, if you have any questions concerning this filing.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Ramirez-Vazquez", is written over a horizontal line.

Lt. Colonel Carlos S. Ramirez-Vazquez
Attorney, United States Army
US Army Legal Services Agency
Office of The Judge Advocate General
9275 Gunston Road (JALS-TCAP)
Fort Belvoir, Virginia 22060
carlos.s.ramirezvazquez.mil@army.mil

Cc: Deputy Chief Administrative Law Judge Christopher P. Pell (via E-mail)
Administrative Law Judge Barbara Shadie Nause (via E-mail)
Army attorney John Joseph McNutt, john.j.mcnutt.civ@army.mil | (m) (619) 302-9642

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PETITION TO INTERVENE BY UNITED STATES DEPARTMENT OF DEFENSE
AND ALL OTHER FEDERAL EXECUTIVE AGENCIES**

In accordance with 52 Pa. Code §§ 5.72-5.75, the United States Department of Defense and all other Federal Executive Agencies (DOD/FEA) file this Petition to Intervene in Docket No. D-R-20125-3057164 as a full intervening party. In support of this Petition, DOD/FEA states as follows:

1. DOD/FEA consists of certain agencies of the United States Government which have offices, facilities, or installations in the service area of PPL Electric Utilities Corporation (PPL). PPL's rate case would (if approved in full) substantially increase the annual costs to DOD/FEA for electricity services in Pennsylvania. The General Services Administration has delegated to the Department of Defense and to the U.S. Army authority to intervene in this proceeding to represent and to protect the consumer interests of DOD/FEA.

2. DOD/FEA's installations in PPL's service territory include Tobyhanna Army Depot, Carlisle Barracks/Army War College, Scranton Army Ammunition Plant, Naval Support Activity Mechanicsburg, Defense Logistics Agency Distribution Susquehanna (Eastern Distribution Center), and other federal facilities. These military installations employ thousands

of full-time personnel and are substantial consumers of electricity. Because of DOD/FEA's unique load and reliability requirements, DOD/FEA's interests in this rate case cannot be adequately represented by any other party. DOD/FEA's interests will be substantially and specifically affected by the proceeding and DOD/FEA's participation in this matter is not only appropriate but is necessary to protect its interests. DOD/FEA will act in a timely manner to meet any deadlines established by the Commission or the ALJ and DOD/FEA's participation in this proceeding will not broaden any issue or delay the proceeding in any way.

3. DOD/FEA meets the standards for intervention in this proceeding set forth in 52 Pa. Code § 5.72(a). As a direct customer of PPL and consumer of PPL's services, DOD/FEA possesses interests which may be directly affected and which are not adequately represented by existing participants, and as to which petitioner may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(1). PPL is proposing to modify the rates and terms of service for various customer classes, including classes in which DOD/FEA is a member. DOD/FEA has unique interests because of the size of the load at its installations and because of DOD/FEA's interest in ensuring reliability of electric service in support of ongoing military operations and related activities. Intervention is also permitted where participation of the person or entity may be in the public interest. As one of the largest employers in PPL's service territory, DOD/FEA's participation in this proceeding is in the public interest.

4. DOD/FEA is also seeking to intervene in this proceeding to ensure that all of PPL's existing rates, rules, and regulations are just, reasonable and non-discriminatory related to DOD/FEA's interest as a major consumer of electricity on PPL's system. DOD/FEA's position regarding the issues in this proceeding is that the proposed rate increases are unreasonable and

discriminatory against DOD/FEA's rate classes. The Commission should deny the proposed increases.

5. Counsel filing this petition is a duly authorized representative of DOD/FEA.

DOD/FEA's counsel's name, title, agency, address, e-mail, and telephone number are:

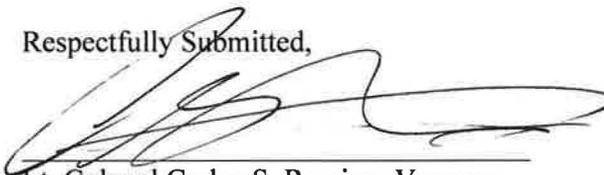
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6. Counsel for DOD/FEA consents to the service of documents in this proceeding by electronic mail to carlos.s.ramirezvazquez.mil@army.mil (cc to john.j.mcنutt.civ@army.mil) as authorized by 52 Pa. Code § 1.54(b)(3).

WHEREFORE, DOD/FEA respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene and provide DOD/FEA with full party status in this proceeding.

Dated: November 4, 2025

Respectfully Submitted,



Lt. Colonel Carlos S. Ramirez-Vazquez
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*Counsel for the United States Department of
Defense and all other Federal Executive Agencies*

Verification

I, John J. McNutt, am a United States Army attorney and authorized to verify this petition on behalf of the United States Department of Defense and all other Federal Executive Agencies (DOD/FEA). I hereby state that the facts set forth in the foregoing *Petition to Intervene* are true and correct to the best of my knowledge, information, and belief and that I expect DOD/FEA to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to sworn falsification to authorities).

Dated: November 4, 2025



John J. McNutt

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

Via Electronic Mail

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Dated this 4th day of November 2025



John J. McNutt