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November 5, 2025

**Via Electronic Filing**

Matthew Homsher, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

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

Dear Secretary Homsher:

Enclosed for electronic filing please find IGS Solar's ("IGS") Petition to Intervene with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

*Renardo L. Hicks*

Renardo L. Hicks

RLH/jls

Enclosure

cc: Hon. Christopher P. Pell w/enc.  
Hon. Barbara Shadie Nause w/enc.  
Cert. of Service w/enc.

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of IGS Solar's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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Dated: November 5, 2025

*/s/ Renardo L. Hicks*

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Renardo L. Hicks, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**PETITION TO INTERVENE OF  
IGS SOLAR**

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Pursuant to 52 Pa Code §§ 5.72-5.75, IGS Solar (“IGS”) submits this Petition to Intervene in the above-referenced PPL Electric Utilities Corporation (“PPL” or “Company”) base rate proceeding. In support of this Petition, IGS states as follows:

**I. BACKGROUND**

1. IGS is licensed by the Pennsylvania Public Utility Commission. (“PUC” or “Commission”) to sell electric energy to homes and businesses in several of the markets of Pennsylvania’s major electric distribution companies (“EDCs”), including in PPL’s service territory.<sup>1</sup> IGS provides solar PV sited behind a residential or commercial customer's meter.

2. IGS’s attorneys in this matter are:

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<sup>1</sup> IGS Solar is registered in Pennsylvania as a Foreign Limited Liability Company, and operates under the license granted by the PA PUC in Docket No A-2011-2228643 to Interstate Gas Supply, LLC to begin to offer, render, furnish, or supply electric generation services as a supplier to residential, small commercial (25 kW and under demand), large commercial (over 25 kW demand), industrial, and governmental customers in the electric distribution company service territories of Duquesne Light Company, Metropolitan Edison Company, PECO Energy Company, Pennsylvania Electric Company, Pennsylvania Power Company, PPL Electric Utilities Corporation, and West Penn Power Company in the Commonwealth of Pennsylvania.

3. PPL's rate filing includes a number of proposals that, if approved, would have a significant negative effect on IGS and competitive markets more broadly. IGS has preliminarily identified proposals that raise serious concerns. For example, PPL proposes the automatic and mandatory transfer of all Alternative Energy Credits (AECs) from all net metering customer-generators to PPL. This proposal presents a fundamental change from the current process, which under the AEPS Act, customer-generators own their AECs, which they may sell to others. PPL is also proposing other changes to its tariff which IGS intends to carefully review for customer-generator impacts.

4. If adopted, these proposals will have a significant impact on the ability of IGS to continue to provide competitive solar energy service to residents and businesses in the PPL service territory given the likely reduced revenue and increased costs and additional processes IGS will be required to manage. For these reasons, IGS should be permitted to intervene in this proceeding to be able to fully investigate the potential anticompetitive impact of PPL's various proposals. IGS is continuing to review PPL's filing and reserves its ability to raise additional issues as this matter proceeds.

## **II. PETITION TO INTERVENE**

5. The Commission's regulations allow intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A "person" includes a corporation and an association. 52 Pa. Code § 1.8.

6. IGS meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). IGS actively serves residential and business customers in PPL's service territory. PPL's proposals

threaten to significantly increase costs on IGS and the residential and business customers it serves and would undermine competitive markets in Pennsylvania. As such, IGS has interests that will be directly affected by this proceeding.

7. IGS will be bound by the action of the Commission in this proceeding. The Commission's decision on PPL's proposals will directly impact competitive market offerings and the products and services offered by IGS.

8. IGS' interest in this proceeding are distinctly different from merchant-generators, where a developer places a small load co-located with a large (3MW) generating system and exports the vast majority of their generation. IGS' interest in solar PV sited behind a residential or commercial customer's meter is distinctly different from that of a merchant-generator. IGS is genuinely concerned about proposals and initiatives which advance changes regarding customer-generator sited solar where the PV system is sized to meet annual load (or some % above annual load, such as 125% above annual load).

9. IGS' interests in this proceeding are unique from and not adequately represented by other parties that may seek to intervene, including individual merchant-generators and other organizations interested in electric competition in Pennsylvania in general and in PPL's service territory in particular. This is because IGS' primary business interest is solar PV sited behind a residential or commercial customer's meter.

10. For all these reasons, IGS possesses an "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." 52 Pa. Code § 5.72(a)(1).

11. Moreover, IGS' specific experience in PPL's service territory, as well as other service territories in Pennsylvania and other states uniquely positions it to review and assess this

rate case filing. Accordingly, IGA' participation in this proceeding is clearly in the public interest. *See* 52 Pa. Code § 5.72(a)(3).

### III. CONCLUSION

**WHEREFORE**, IGS respectfully requests that its Petition to Intervene be granted so that IGS may fully participate in this proceeding. IGS has interests in this proceeding that will be directly and substantially affected by the outcome of this proceeding, and its interests are sufficiently different from that of any other party so as to add measurably and constructively to the proceeding.

Respectfully submitted,

*/s/ Renardo L. Hicks*

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Date: November 5, 2025

*Counsel for the IGS Solar*

**VERIFICATION**

I, Katie B. Rever hereby state that I am the Director of Legislative and Regulatory Affairs for IGS Solar. I affirm that the facts set forth in the forgoing Petition to Intervene are true and correct (or are true and correct to the best of my knowledge, information and belief); and I expect 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 unsworn falsification to authorities).

11/5/2025

*/s/ Katie B Rever*

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Dated

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Katie B. Rever, Director  
Legislative and Regulatory Affairs  
IGS Solar