

Before the Pennsylvania Public Utility Commission

**PPL Electric Utilities :
Corporation Distribution : Docket No. Rate Increase
Request : R 2025-3057164**

October 31, 2025

**Prehearing Memorandum of
Eric Joseph Epstein, Pro se**

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O Box 3265
400 North Street, Second Floor
Harrisburg, PA 17120

DATE OF DEPOSIT

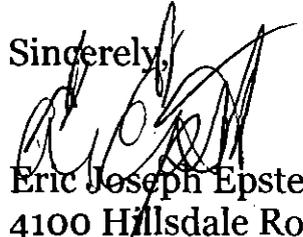
OCT 31 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dear Secretary Matthew Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission are the original and three (3) copies of Eric Joseph Epstein's Prehearing Memorandum in the above-referenced proceeding. Pursuant to Section 701 of the Pennsylvania Public Utility Commission of the Code 66 Pa. C.S.A. §701; Sections 5.21 & 5.22, Eric Joseph Epstein, Pro se hereby files a Prehearing Memorandum.

Sincerely,



Eric Joseph Epstein, Pro se
4100 Hillsdale Road
Harrisburg, PA 17112
cc: Certificate of Service

**Pre-Hearing Memorandum
of Eric Joseph Epstein, Pro se**

The name and address of the Petitioner:

Eric Joseph Epstein, Pro se
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Harrisburg, PA 17112
(717)-635-8615
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DATE OF DEPOSIT

OCT 31 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

The name and address of the Respondent:

PPL Electric Utility Corporation
Two North 9th Street
Allentown, PA 18101-1179

I. Introduction.

1. On September 30, 2025, PPL filed a request with the Pennsylvania Public Utility Commission (“PUC”) for a distribution base rate adjustment.
2. The official docket number for this rate case is R-2025-3057164.
3. PPL stated the rate increase is purported to be needed to fund necessary investments to modernize and strengthen the electric grid.
4. The rate case is under review by the PUC, which plans to hold public hearings. Any approved rate change would not take effect until the review process is complete, potentially around July 1, 2026.
5. The Commission voted 5-0 to investigate PPL’s proposed rate increase, which was filed on September 30, 2025, and seeks an annual increase in revenues of \$356.3 million (33.4%). As proposed, the total monthly bill for a residential customer using 918 kWh per month would increase from \$177.01 to \$189.40 (7%).

II. Mr. Epstein's Interest in the Proceeding.

6. Mr. Epstein receives generation, distribution and transmission service from the PPL Electric Utilities (or "PPL" or "the Company"), and he is been a PPL shareholder for 30 years. (Please refer to Epstein's Petition to Intervene.)

III. Statement of Issues.

7. Eric Joseph Epstein is analyzing the assumptions, methodology, and presumed outcomes associated with PPL's Filing and Direct Testimony.

8. Mr. Epstein's preliminary review of the Company's filing indicates the need for Commission investigation into at least the following issues:

- a. The expenses claimed by PPL may not be prudently incurred;
- b. PPL's proposed rate structure and rate design may be inappropriate;
- c. The allocation of the proposed rate increases between and among customer classes must be reasonable and nondiscriminatory;
- d. The rate of return on equity proposed by PPL and other aspects of the Company's proposal may not result in an excessive rate of return;
- e. PPL's cost and quality of service must be accurate, legitimate and appropriately allocated;
- f. PPL must implement a program for senior citizens on fixed incomes who will be forced into a "hardship class" as a result of PPL's Plan;
- g. PPL must implement a program to decrease the dramatic number of customer shutoffs;

h. PPL must outline expenses related to this filing including but not limited to fees and charges for advertising, consulting, legal, lodging, marketing and travel as well as other expenses billed to rate payers; and,

i. Distribution and resiliency for the generation of AI will require more resilient transmission capacity. Data centers connect at much higher transmission voltages, and they require heavier duty wires than typical electric users. This may create distribution rate shock, and spikes in Distribution System Improvement Charges (1).

8. Eric Joseph Epstein anticipates pursuing these issues during this proceeding, and reserves the right to raise and address other issues of concern, and to respond to issues raised by other parties.

IV. Proposed Witnesses.

9. Mr. Epstein respectfully reserves the right to modify or supplement his witness list during the course of this proceeding. In the event that Eric Joseph Epstein decides to modify or supplement his witness list, Epstein will inform the parties and the Administrative Law Judge ("ALJ").

IV. Proposed Schedule & Discovery Rules.

10. Mr. Epstein will fully cooperate with the Court and the Parties at the Prehearing Conference to develop an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any ALJ directives; including, the schedule and timing of aggressive afternoon and evening Public Input Hearings in Allentown, Harrisburg, Lancaster, Scranton, and Williamsport.

11. Eric Joseph Epstein is willing to participate in Settlement discussions and negotiations with the other parties to resolve all outstanding issues in this proceeding.

¹ The DSIC is designed to provide for "the timely recovery of the reasonable and prudent costs incurred to repair, improve or replace eligible property in order to ensure and maintain adequate, efficient, safe, reliable and reasonable services. (66 Pa.C.S. § 1353)

V. Settlement Discussions.

11. Eric Joseph Epstein is willing to participate in Settlement discussions and negotiations with the other parties to resolve all outstanding issues in this proceeding.

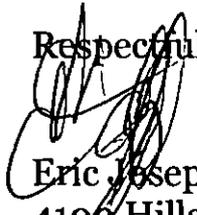
Conclusion.

12. The Company's Testimony and documentation to support their rate requests are insufficient to establish that the proposed rates are just, reasonable and nondiscriminatory, as required by Sections 1301 & 1304 of the Code, 66 Pa. C.S.A. § 1301 & 1304.

13. The Respondent has the full burden of proof [Section 315 (a) of the Public Utility Code, 66 Pa. C.S.A. § 315 (a)] to establish, and prove that the proposed rate increases are just and reasonable and consistent with Section 1301 of the Code, 66 Pa. C.S.A. § 1301.

- i) Conduct an investigation into the rates, terms, and provisions contained in PPL's proposed annual increase in full evidentiary hearings;
- ii) Grant Eric Joseph Epstein's Petition to Intervene;
- iii) Allow Mr. Epstein to fully participate in the evidentiary proceeding, cross examine PPL witnesses as well as witnesses presented by Active Parties; present his own evidence; prepare direct, rebuttal and sur- rebuttal testimony; and, offer arguments on his own behalf.

Respectfully submitted,



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(717)-541-1101 Phone
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Dated: October 31, 2025

Certification of Service

I hereby certify that a true and correct copy of this filing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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OCT 31 2025

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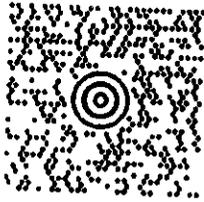
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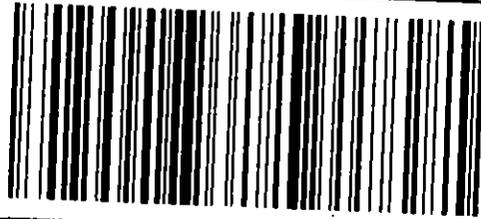


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