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December 2, 2025

**Via Electronic Filing**

Matthew Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission, Coalition For Affordable Utility Services and Energy Efficiency in Pennsylvania, Office of Small Business Advocate, Office of Consumer Advocate, Brad and Jennifer Wooley, PP&L Industrial Customer Alliance, Convergent Energy and Power LP, Solar Energy Industries Association and the Coalition for Community Solar Access, Rik Bhattacharyya v. PPL Electric Utilities Corporation

Docket Nos. R-2025-3057164, C-2025-3057844, C-2025-3057889, C-2025-3058130, C-2025-3057946, C-2025-3058271, C-2025-3058300, C-2025-3058251, C-2025-3058846

Dear Secretary Homsher:

Please find enclosed for filing with the Pennsylvania Public Utility Commission the Second Motion for Leave to Amend Petition to Intervene of the Customer-Generator Coalition, ("CGC") in the above captioned proceeding.

As shown by the attached Certificate of Service, all parties to these proceedings are being duly served.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Daniel Garcia', written over a horizontal line.

Daniel Garcia, Of Counsel  
STEPTOE & JOHNSON PLLC

CC: Hon. Christopher P. Pell, (email only)  
Hon. Barbara Shadie Nause, (email only)  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2025-3057164
Coalition For Affordable Utility Services	:	
and Energy Efficiency in Pennsylvania	:	C-2025-3057844
Office of Small Business Advocate	:	C-2025-3057889
Office of Consumer Advocate	:	C-2025-3058130
Brad and Jennifer Wooley	:	C-2025-3057946
PP&L Industrial Customer Alliance	:	C-2025-3058271
Convergent Energy and Power LP	:	C-2025-3058300
Solar Energy Industries Association and	:	C-2025-3058251
The Coalition for Community Solar Access	:	C-2025-3058846
Rik Bhattacharyya	:	
	:	
	:	
v.	:	
	:	
PPL Electric Utilities Corporation	:	

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**NOTICE TO PLEAD**

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YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.103(c), ANSWERS TO MOTIONS ARE DUE WITHIN TWENTY (20) DAYS AFTER THE DATE OF SERVICE. YOUR ANSWERS SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P. O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.



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Date: December 2, 2025

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CVE North America, Syncarpha Capital,

LLC, Twilight Renewables, Bollinger Solar,  
and CEP Renewables, LLC

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2025-3057164
Coalition For Affordable Utility Services	:	
and Energy Efficiency in Pennsylvania	:	C-2025-3057844
Office of Small Business Advocate	:	C-2025-3057889
Office of Consumer Advocate	:	C-2025-3058130
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Solar Energy Industries Association and	:	C-2025-3058251
The Coalition for Community Solar Access	:	C-2025-3058846
Rik Bhattacharyya	:	
	:	
	:	
v.	:	
	:	
PPL Electric Utilities Corporation	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system the foregoing Second Motion to Amend Petition to Intervene and that I have served a true and correct copy of the same upon the following parties of record in accordance with 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

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Dated: December 2, 2025



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Counsel for Customer-Generator Coalition

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2025-3057164
Coalition For Affordable Utility Services	:	
and Energy Efficiency in Pennsylvania	:	C-2025-3057844
Office of Small Business Advocate	:	C-2025-3057889
Office of Consumer Advocate	:	C-2025-3058130
Brad and Jennifer Wooley	:	C-2025-3057946
PP&L Industrial Customer Alliance	:	C-2025-3058271
Convergent Energy and Power LP	:	C-2025-3058300
Solar Energy Industries Association and	:	C-2025-3058251
The Coalition for Community Solar Access	:	C-2025-3058846
Rik Bhattacharyya	:	
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	:	
v.	:	
	:	
	:	
PPL Electric Utilities Corporation	:	

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**SECOND MOTION TO AMEND PETITION TO INTERVENE OF  
ASPEN POWER, 38 DEGREES, CVE NORTH AMERICA, SYNCARPHA CAPITAL,  
LLC, TWILIGHT RENEWABLES, BOLLINGER SOLAR, AND CEP RENEWABLES**

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Pursuant to Sections 1.81, 5.103(a)-(b) and 5.91 of Pennsylvania Public Utility Commission’s (“Commission”) Regulations, 52 Pa. Code §§ 1.81, 5.103(a)-(b), 5.91(c), Aspen Power, 38 Degrees, CVE North America, Syncarpha Capital, LLC, Twilight Renewables, Bollinger Solar, and CEP Renewables, LLC, collectively as the Customer-Generator Coalition (“CGC” or “Coalition”), by and through its undersigned counsel, Steptoe & Johnson PLLC, respectfully submits this Second Motion to Amend Petition to Intervene<sup>1</sup> in the above-captioned proceeding.

The Coalition respectfully states that this Second Motion to Amend and the accompanying Second Amended Petition to Intervene are filed solely for the limited purpose of updating the list

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<sup>1</sup> The Coalition filed a Motion to Amend Petition to Intervene on October 30, 2025. As no ruling has been made on that motion, the Coalition party members filing this motion are those listed in the original Petition to Intervene.

of participating entities. The Coalition does not intend, and this filing shall not be construed, to supersede, withdraw, or replace its original Petition to Intervene and its Amended Petition to Intervene filed in this proceeding. All factual averments, legal arguments, and requests for relief contained in the original Petition and Amended Petition are hereby expressly preserved and incorporated by reference as though fully set forth herein. The Second Amended Petition<sup>2</sup> merely supplements the prior filing to reflect the addition of new parties (Dynamic Energy Solutions, LLC and Encore Renewable Energy) and the removal of a party (Twilight Renewables) and shall not constitute a waiver or modification of any prior statements or claims.

In support of this Motion, the Coalition states as follows:

**I. BACKGROUND**

1. On September 30, 2025, PPL filed Original Tariff Electric, Pa. P.U.C. No. 202 (“Tariff No. 202”), seeking a general rate increase pursuant to 66 Pa. C.S. § 1308(d) of the Public Utility Code and Original Tariff Electric, Pa. P.U.C. No. 2S (“Tariff No. 2S”), which is PPL’s proposed Electric Generation Supplier Coordination Tariff and sets forth PPL’s rules, regulations, charges, and riders for its provision of coordination services to electric generation suppliers (“EGSs”).

2. On October 15, 2025, the Coalition filed its Petition to Intervene in this docket. The Petition was accepted and the Coalition was granted party status in the proceeding.

3. The Commission, by Order entered October 24, 2025, suspended PPL’s proposed Tariff Electric Pa. P.U.C. Nos. 202 and 2S for investigation pursuant to 66 Pa.C.S. § 1308(d) and

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<sup>2</sup> The Second Amended Petition to Intervene includes the same updates to participating entities that were requested in the Coalition’s first Motion to Amend Petition to Intervene filed on October 30, 2025. Although the Administrative Law Judges have not yet ruled on that motion, the Coalition incorporates those revisions here to maintain a single, consolidated pleading. This amendment is made solely for administrative clarity and is not intended to presume or prejudge the ALJs’ ruling on the prior motion.

assigned this matter to the Office of Administrative Law Judge (“OALJ”) for hearings and the issuance of a Recommended Decision.

4. Since filing its initial Petition, the Coalition has experienced strong interest from additional entities seeking to join and participate formally as members. These entities have direct, substantial, and legally protectable interests in the outcome of this proceeding because they currently operate, or have pending interconnection applications for renewable generation facilities within PPL’s service territory that would be materially affected by the proposed tariff changes.

5. On October 30, 2025, the Coalition filed a Motion to Amend Petition to Intervene to add several additional parties to this proceeding. That motion has not been ruled on yet.

6. Since the filing of that motion, several additional entities have expressed their desire to join and participate in this proceeding.

7. The addition of these additional entities will ensure that the Commission has a full and representative record of the potential impacts of the proposed tariff revisions across Pennsylvania’s renewable-energy sector.

8. Additionally, one Coalition member has decided to be removed from this proceeding.

9. The Coalition therefore seeks leave to amend its Petition to Intervene pursuant to 52 Pa. Code §§ 1.81 and 5.91 to (1) add additional entities as parties to the proceeding and (2) remove an entity as a party to the proceeding. This amendment is intended solely to ensure administrative accuracy and completeness of the record and is not intended to supersede or replace the Coalition’s original Petition to Intervene. All prior averments, arguments, and requests for relief set forth therein are hereby preserved and incorporated by reference as though fully set forth at length herein.

## **II. LEGAL STANDARD**

10. Section 5.91 of the Commission's regulations allow for the "modification of or supplement to an application, complaint, petition or other pleading." 52 Pa. Code § 5.91(a). Further, Section 1.81 of the Commission's regulations states, "[a]n amendment to a submittal or pleading may be tendered for filing at any time and will be deemed filed in accordance with § 1.11 (relating to date of filing) unless the Commission otherwise orders." 52 Pa. Code § 1.81(a); *see also* 1 Pa. Code § 33.41. Under these regulations, the Coalition's right to amend its Petition at this time is indisputable.

11. The requested amendment does not alter the substantive issues raised in the Coalition's original Petition, nor does it change the scope or posture of the Coalition's participation. Rather, it ensures that all affected customer-generators are represented under a unified procedural umbrella, avoiding duplicative filings and unnecessary procedural complexity.

## **III. GOOD CAUSE EXISTS TO GRANT THIS MOTION**

12. Each of the additional entities identified in Exhibit A has a direct and immediate financial and operational interest in the subject matter of this proceeding. Their projects either hold Commission-approved net-metering certifications or are in advanced stages of interconnection within PPL's distribution system.

13. PPL's proposed tariff revisions would, if approved, substantially affect these entities' existing and planned operations by altering rate classifications, export crediting mechanisms, and AEC ownership rights. Their participation will contribute valuable factual and technical evidence regarding the potential impacts of the proposed tariff.

14. Additionally, Twilight Renewables desires to be removed from this proceeding.

15. Granting this Motion will not delay the proceeding, prejudice any party, or impose additional procedural burdens. The Coalition continues to be represented by the same counsel of record, ensuring continuity and efficiency.

16. The requested amendment is thus consistent with the Commission's policy favoring broad and inclusive participation by affected stakeholders in rate proceedings involving statewide policy implications.

**WHEREFORE**, Aspen Power, 38 Degrees, CVE North America, Syncarpha Capital, LLC, Twilight Renewables, Bollinger Solar, and CEP Renewables, LLC, collectively as the Customer-Generator Coalition, respectfully requests that the Pennsylvania Public Utility Commission (i) grant this Second Motion for Leave to Amend its Petition to Intervene for the limited purpose of updating the list of participating entities; (ii) deem the Second Amended Petition to Intervene, attached as Exhibit A, as supplementing, not superseding, the Coalition's original Petition to Intervene; and (iii) confirm that all factual averments, legal arguments, and requests for relief set forth in the original Petition remain preserved and incorporated by reference herein.

Respectfully submitted,



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—  
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Date: December 2, 2025

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Twilight Renewables, Bollinger Solar, and  
CEP Renewables, LLC

# Exhibit A

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2025-3057164
Coalition For Affordable Utility and Energy Efficiency in Pennsylvania	:	C-2025-3057844
Office of Small Business Advocate	:	C-2025-3057889
Office of Consumer Advocate	:	C-2025-3058130
Brad and Jennifer Wooley	:	C-2025-3057946
PP&L Industrial Customer Alliance	:	C-2025-3058271
Convergent Energy and Power LP	:	C-2025-3058300
Solar Energy Industries Association	:	C-2025-3058251
The Coalition for Community Solar	:	C-2025-3058846
Rik Bhattacharyya	:	
	:	
v.	:	
	:	
PPL Electric Utilities Corporation	:	

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**SECOND<sup>1</sup> AMENDED PETITION TO INTERVENE OF  
ASPEN POWER PARTNERS LLC, 38 DEGREES NORTH, BOLLINGER SOLAR, CEP  
RENEWABLES, LLC, CVE NORTH AMERICA, EDPR NA DISTRIBUTED  
GENERATION LLC, GS POWER PARTNERS, PROSPECT14 LLC, RADIAL POWER  
LLC, SCALE MICROGRIDS, SOLAR RENEWABLE ENERGY, LLC, SR1 CAPTURA  
SAGE HOLDCO I, LLC, SYNCARPHA CAPITAL, LLC, DYNAMIC ENERGY, AND  
ENCORE RENEWABLES**

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Pursuant to 52 Pa. Code §§ 1.81, and 5.71–5.75 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) Regulations, Aspen Power Partners LLC, 38 Degrees North, Bollinger Solar, CEP Renewables, LLC, CVE North America, EDPR NA Distributed Generation LLC, GS Power Partners, Prospect14 LLC, Radial Power LLC, Scale Microgrids, Solar Renewable Energy, LLC, SR1 Captura Sage Holdco I, LLC, Syncarpha Capital, LLC,

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<sup>1</sup> The Coalition filed a Motion to Amend Petition to Intervene on October 30, 2025. This Second Amended Petition to Intervene includes the same updates to participating entities that were requested in the Coalition’s first Motion to Amend Petition to Intervene filed on October 30, 2025. Although the Administrative Law Judges have not yet ruled on that motion, the Coalition incorporates those revisions here to maintain a single, consolidated pleading. This amendment is made solely for administrative clarity and is not intended to presume or prejudge the ALJs’ ruling on the prior motion..

Dynamic Energy Solutions, LLC, and Encore Renewable Energy, collectively as the Customer-Generator Coalition (“CGC” or “Coalition”), by and through its undersigned counsel, Steptoe & Johnson PLLC, respectfully submits this Second Amended Petition to Intervene in the above-captioned proceeding initiated by PPL Electric Utilities Corporation (“PPL” or “the Company”).

This second amendment updates the membership of the Coalition to (1) include additional entities with a direct and substantial interest in the outcome of this proceeding, and (2) remove an entity as a party to the proceeding. This second amendment is intended solely to ensure administrative accuracy and completeness of the record and is not intended to supersede or replace the Coalition’s Original Petition to Intervene. All prior averments, arguments, and requests for relief set forth therein are hereby preserved and incorporated by reference as though fully set forth at length herein. The Coalition’s legal position and requested relief remain unchanged from its Original Petition to Intervene, filed October 15, 2025.

## **I. BACKGROUND**

1. On September 30, 2025, PPL filed Original Tariff Electric, Pa. P.U.C. No. 202 (“Tariff No. 202”) seeking a general rate increase pursuant to 66 Pa. C.S. § 1308(d) of the Public Utility Code and Original Tariff Electric, Pa. P.U.C. No. 2S (“Tariff 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”).

2. On October 15, 2025, the Coalition filed its Petition to Intervene in this docket (“Original Petition to Intervene” or “Petition”). The Petition was accepted and the Coalition was granted party status in the proceeding.

3. By Order entered October 24, 2025, the Commission suspended PPL's proposed Tariff Electric Pa. P.U.C. Nos. 202 and 2S pursuant to 66 Pa.C.S. § 1308(d) and referred the matter to the Office of Administrative Law Judge ("OALJ") for hearings and a Recommended Decision.

4. Since the filing of the Original Petition to Intervene, several additional renewable-energy developers and customer-generators have requested to join the Coalition, recognizing that the issues raised in this proceeding, specifically, PPL's proposed Maximum Registered Peak Load (MRPL) reclassification and Alternative Energy Credit (AEC) ownership provisions, directly affect their projects, financial interests, and interconnection rights.

5. The addition of these additional entities will ensure that the Commission has a full and representative record of the potential impacts of the proposed tariff revisions across Pennsylvania's renewable-energy sector.

6. Additionally, one Coalition member has decided to be removed from this proceeding.

## **II. PROPOSED INTERVENORS**

7. CGC is an *ad hoc* group of various customer-generators engaged in the development, ownership, and operation of solar photovoltaic power generation throughout the Commonwealth, including within PPL's service territory.

8. Each member of the Coalition owns, operates, or develops renewable-energy generation facilities within PPL's service territory that either:

(a) are interconnected under the Commission's Alternative Energy Portfolio Standards ("AEPS") Regulations, 52 Pa. Code §§ 75.21 - 75.51, or

(b) are actively pursuing interconnection under PPL's tariff.

9. The attorneys for Customer-Generators Coalition in this matter are:

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Counsel consents to electronic service pursuant to 52 Pa. Code § 1.54(b)(3).

10. Dynamic Energy Solutions, LLC and Encore Renewable Energy are hereby added as members of the Customer-Generator Coalition and join in all representations and requests for relief set forth in the Original Petition to Intervene.

11. Twilight Renewables is hereby removed as a member of the Customer-Generator Coalition.

12. A complete and current list of all participating Coalition members is attached as Appendix A to this Second Amended Petition.

### **III. LEGAL STANDARD**

13. Under 52 Pa. Code § 1.81, the Commission or the Presiding Officer may grant leave to amend a pleading at any time to ensure a complete and accurate record. The Commission routinely allows amendments that do not alter the substantive issues or prejudice other parties. See also 52 Pa. Code § 5.91.

14. Section 5.72(a) provides that a person may intervene if that person “has an interest which may be directly affected and which is not adequately represented by existing participants.” The additional members identified herein plainly meet this standard.

15. This amendment does not expand the scope of the Coalition's participation, introduce new issues, or modify the relief requested. Rather, it consolidates representation of affected stakeholders under one coordinated party, promoting administrative efficiency and avoiding duplicative filings.

16. Granting this amendment will ensure a full and fair record on the implications of PPL's proposed MRPL and AEC tariff provisions while maintaining procedural economy.

**WHEREFORE**, Aspen Power Partners LLC, 38 Degrees North, Bollinger Solar, CEP Renewables, LLC, CVE North America, EDPR NA Distributed Generation LLC, GS Power Partners, Prospect14 LLC, Radial Power LLC, Scale Microgrids, Solar Renewable Energy, LLC, SR1 Captura Sage Holdco I, LLC, Syncarpha Capital, LLC, Dynamic Energy Solutions, LLC, and Encore Renewable Energy, respectfully request that the Pennsylvania Public Utility Commission (i) grant its Second Amended Petition to Intervene; (ii) accept the additional entities identified in Section II, above, (iii) remove Twilight Renewables as a member of the Coalition, and (iv) grant any other relief as it deems necessary.

Respectfully submitted,



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Date: December 2, 2025

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**APPENDIX A – CUSTOMER-GENERATOR COALITION MEMBERSHIP LIST**

<b>Entity Name</b>
38 Degrees North
Aspen Power Partners LLC
Bollinger Solar
CEP Renewables,LLC
CVE North America
EDPR NA Distributed Generation LLC
GS Power Partners
Prospect14 LLC
Radial Power LLC
Scale Microgrids
Solar Renewable Energy, LLC
SR1 Captura Sage Holdco I, LLC
Syncarpha Capital, LLC
Dynamic Energy Solutions, LLC
Encore Renewable Energy

## VERIFICATION

I, DANIEL GARCIA, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that 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).

Dated: December 2, 2025



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Daniel A. Garcia  
Counsel for Customer-Generator Coalition