



Regulation is a maze. We can show you the way!

Judith D. Cassel  
717.703.0804  
[jdcassel@hmslegal.com](mailto:jdcassel@hmslegal.com)

Micah R. Bucy  
717.703.0813  
[mrbcy@hmslegal.com](mailto:mrbcy@hmslegal.com)

Whitney E. Snyder  
717.703.0807  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)

Kathryn C. Read-Fisher  
717.703.0808  
[kcr@hmslegal.com](mailto:kcr@hmslegal.com)

---

501 Corporate Circle, Suite 302, Harrisburg, PA 17110 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

December 5, 2025

**VIA ELECTRONIC MAIL**

Devin T. Ryan, Esquire  
Alice A. Wade, Esquire  
Hayley E. Wilburn, Esquire  
Post & Schell, P.C.  
One Oxford Centre  
301 Grant Street, Suite 3010  
Pittsburgh, PA 15219

David B. MacGregor, Esquire  
Garrett P. Lent, Esquire  
Anthony C. DeCusatis, Esquire  
Erin R. Kawa, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601

Re: Pennsylvania Public Utility Commission, et al. v. PPL Electric Utilities Corporation;  
Docket No. R-2025-3057164, et al.; **THE SUSTAINABLE ENERGY FUND  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS, SET III, DIRECTED TO PPL ELECTRIC UTILITIES  
CORPORATION**

Dear Counsel:

Please find enclosed The Sustainable Energy Fund (“SEF”) Interrogatories and Requests for Production of Documents, Set III, Directed to PPL Electric Utilities Corporation in the above-captioned docket. Copies have been served in accordance with the attached Certificate of Service.

If you have any questions, please do not hesitate to contact my office.

Very truly yours,

*/s/ Whitney E. Snyder*

Judith D. Cassel  
Whitney E. Snyder  
Micah R. Bucy  
Kathryn C. Read-Fisher

*Counsel for The Sustainable Energy Fund*

WES/das  
Enclosure

cc: Matthew L. Homsher, Secretary (via electronic filing Letter and COS only)  
Per Certificate of Service

**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 52 Pa. Code § 1.54 (relating to service by a party).

**VIA ELECTRONIC MAIL**

David B. MacGregor, Esquire  
Garrett P. Lent, Esquire  
Anthony C. DeCusatis, Esquire  
Erin R. Kawa, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)  
[adecusatis@postschell.com](mailto:adecusatis@postschell.com)  
[ekawa@postschell.com](mailto:ekawa@postschell.com)  
*Counsel for PPL Electric Utilities Corporation*

Devin T. Ryan, Esquire  
Alice A. Wade, Esquire  
Hayley E. Wilburn, Esquire  
Post & Schell, P.C.  
One Oxford Centre  
301 Grant Street, Suite 3010  
Pittsburgh, PA 15219  
[dryan@postschell.com](mailto:dryan@postschell.com)  
[alice.wade@postschell.com](mailto:alice.wade@postschell.com)  
[hwilburn@postschell.com](mailto:hwilburn@postschell.com)  
*Counsel for PPL Electric Utilities Corporation*

Kimberly A. Klock, Esquire  
Michael J. Shafer, Esquire  
PPL Services Corporation  
645 Hamilton Street, Suite 700  
Allentown, PA 18104  
[kklock@pplweb.com](mailto:kklock@pplweb.com)  
[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)  
*Counsel for PPL Electric Utilities Corporation*

Eric Joseph Epstein, Pro Se  
4100 Hillsdale Road  
Harrisburg, PA 17112  
[epstein@efmr.org](mailto:epstein@efmr.org)

Steven C. Gray, Esquire  
Rebecca Lyttle, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

Michael A. Podskoch, Jr., Esquire  
Adam J. Williams, Esquire  
Pennsylvania Public Utility Commission  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)  
[adawilliam@pa.gov](mailto:adawilliam@pa.gov)

Christy M. Appleby  
Harrison W. Breitman  
Jacob D. Guthrie  
Johnathan Longhurst  
Josiah Harman  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[OCA25PPLBRC@paoca.org](mailto:OCA25PPLBRC@paoca.org)

Karl R. Rabago  
Rabago Energy  
1350 Gaylord Street  
Denver, CO 80206  
[karl@rabagoenergy.com](mailto:karl@rabagoenergy.com)

Ria M. Pereira, Esquire  
John W. Sweet, Esquire  
Elizabeth R. Marx, Esquire  
Lauren N. Berman, Esquire  
Levin A. Phillips, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)  
*Counsel for CAUSE-PA*

Joseph L. Vullo, Esquire  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
*Counsel for Commission on Economic Opportunity*

Alan Michael Seltzer, Esquire  
John F. Povilaitis, Esquire  
Buchanan Ingersoll & Rooney PC  
409 N. Second Street, Suite 500  
Harrisburg, PA 17101-1357  
[Alan.seltzer@bipc.com](mailto:Alan.seltzer@bipc.com)  
[John.povilaitis@bipc.com](mailto:John.povilaitis@bipc.com)  
*Counsel for Joint Solar Advocates*

Emma H. Bast, Esquire  
Jessica R. O'Neill, Esquire  
Citizens for Pennsylvania's Future  
1429 Walnut Street, Suite 701  
Philadelphia, PA 19102  
[bast@pennfuture.org](mailto:bast@pennfuture.org)  
[oneill@pennfuture.org](mailto:oneill@pennfuture.org)  
*Counsel for Environmental Petitioners*

Michael Zimmerman, Esquire  
Environmental Defense Fund  
257 Park Avenue S.  
New York, NY 10010  
[mzimmerman@edf.org](mailto:mzimmerman@edf.org)  
*Counsel for Environmental Petitioners*

Daniel A. Garcia, Esquire  
Brian Pulito, Esquire  
Sarah M. Rambin, Esquire  
Steptoe & Johnson, PLLC  
1 PPG Place  
Pittsburgh, PA 15222  
[Daniel.garcia@Steptoe-Johnson.com](mailto:Daniel.garcia@Steptoe-Johnson.com)  
[Brian.Pulito@Steptoe-Johnson.com](mailto:Brian.Pulito@Steptoe-Johnson.com)  
[Sarah.Rambin@Steptoe-Johnson.com](mailto:Sarah.Rambin@Steptoe-Johnson.com)  
*Counsel for Aspen Power, 38 Degrees, CVE North America, Syncarpha Capital, LLC, Twilight Renewables, Bollinger Solar, and CEP Renewables, LLC*

Daniel B. Markind, Esquire  
Flaster Greenberg, PC  
1717 Arch Street, Suite 3300  
Philadelphia, PA 19103  
[Daniel.markind@flastergreenberg.com](mailto:Daniel.markind@flastergreenberg.com)  
*Counsel for Dimension PA I LLC*

Devin McDougall, Esquire  
Earthjustice  
1617 John F. Kennedy Blvd., Suite 2020  
Philadelphia, PA 19103  
[dmcDougall@earthjustice.org](mailto:dmcDougall@earthjustice.org)  
*Counsel for Energy Justice Advocates*

Logan Welde, Esquire  
Lauren Otero, Esquire  
Clean Air Council  
1617 John F. Kennedy Blvd., Suite 1130  
Philadelphia, PA 19103  
[lwelde@cleanair.org](mailto:lwelde@cleanair.org)  
[lotero@cleanair.org](mailto:lotero@cleanair.org)  
*Counsel for Energy Justice Advocates*

Brad and Jennifer Woolley  
2914 Hodle Avenue  
Easton, PA 18045-8103  
[Jwoolley4@rcn.com](mailto:Jwoolley4@rcn.com)

Jamie L. Martines, Esquire  
Spilman Thomas & Battle, PLLC  
301 Grant Street, Suite 3440  
Pittsburgh, PA 15219  
[jmartines@spilmanlaw.com](mailto:jmartines@spilmanlaw.com)  
*Counsel for Walmart Inc.*

Todd S. Stewart  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)  
*Counsel for the Professional Dairy Managers  
of Pennsylvania*

Renardo L. Hicks, Esquire  
Bryce R. Beard, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[rhicks@eckertseamans.com](mailto:rhicks@eckertseamans.com)  
[bbeard@eckertseamans.com](mailto:bbeard@eckertseamans.com)  
*Counsel for the IGS Solar*

Adeolu A. Bakare  
Victoria A. Geddis  
McNees Wallace & Nurick, LLC  
100 Pine Street, PO Box 1166  
Harrisburg, PA 17108-1166  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[vgeddis@mcneeslaw.com](mailto:vgeddis@mcneeslaw.com)  
*Counsel for PP&L Industrial Customer  
Alliance*

Deanne M. O'Dell, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
*Counsel for the Retail Energy Supply  
Association*

Lauren M. Burge, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
600 Grant Street, 44<sup>th</sup> Floor  
Pittsburgh, PA 15219  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)  
*Counsel for the Retail Energy Supply  
Association*

Barry A. Naum, Esquire  
Steven W. Lee, Esquire  
Spilman Thomas & Battle, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
[bnaum@spilmanlaw.com](mailto:bnaum@spilmanlaw.com)  
[slee@spilmanlaw.com](mailto:slee@spilmanlaw.com)  
*Counsel for Walmart Inc.*

Lt. Colonel Carlos S. Ramirez-Vazquez  
U.S. Army Legal Services Agency  
Office of the Judge Advocate General  
9275 Gunston Road (JALS-TCAP)  
Fort Belvoir, VI 22060  
[Carlos.s.ramirezvazquez.mil@army.mil](mailto:Carlos.s.ramirezvazquez.mil@army.mil)  
[John.j.mcnutt.civ@army.mil](mailto:John.j.mcnutt.civ@army.mil)  
*Counsel for the United States Department of  
Defense and all other Federal Executive  
Agencies*

Susan E. Bruce, Esquire  
Rebecca Kimmel, Esquire  
McNees Wallace & Nurick, LLC  
100 Pine Street, PO Box 1166  
Harrisburg, PA 17108-1166  
[sbruce@mcneeslaw.com](mailto:sbruce@mcneeslaw.com)  
[rkimmel@mcneeslaw.com](mailto:rkimmel@mcneeslaw.com)  
*Counsel for Convergent Energy and Power LP*

DATE: December 5, 2025

/s/ Whitney E. Snyder  
Judith D. Cassel  
Whitney E. Snyder  
Micah R. Bucy  
Kathryn C. Read-Fisher