

---

Devin Ryan

dryan@postschell.com  
717-612-6052 Direct  
717-731-1985 Direct Fax  
File #: 209995

December 7, 2025

**VIA E-MAIL**

Emma H. Bast, Esquire  
Jessica R. O'Neill, Esquire  
Citizens for Pennsylvania's Future  
1429 Walnut Street, Suite 701  
Philadelphia, PA 19102

Michael Zimmerman, Esquire  
Environmental Defense Fund  
257 Park Avenue S.  
New York, NY 10010

**Re: PA Public Utility Commission, et al. v. PPL Electric Utilities Corporation**  
**Docket Nos. R-2025-3057164, et al.**

Dear Counsel:

PPL Electric Utilities Corporation ("PPL Electric" or the "Company") has posted the following responses to the Interrogatories and Requests for Production of Documents of the Environmental Defense Fund, Natural Resources Defense Council, and Citizens for Pennsylvania's Future (collectively, "Environmental Intervenors" or "EI") on the OneDrive site established for filesharing in this case:

- EI Set III, Nos. 1-4 and 6-13 (Public)

Any **CONFIDENTIAL** or **HIGHLY CONFIDENTIAL** responses or attachments will only be provided to parties subject to the terms of a Stipulated Protective Agreement or a Protective Order entered in this proceeding. To the extent you require access to OneDrive, please contact Brittney Corey via email at bcorey@postschell.com or Danielle Caley via email at dcaley@postschell.com.

Copies will be provided as indicated on the Certificate of Service.

Emma H. Bast, Esquire  
December 7, 2025  
Page 2

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Devin Ryan", with a stylized, sweeping flourish extending to the right.

Devin Ryan

DTR/bfc  
Enclosure

cc: Matthew L. Homsher, Secretary (*Letter and Certificate of Service Only*)  
Certificate of Service

## CERTIFICATE 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).

### VIA E-MAIL

Michael Podskoch, Esquire  
Adam Williams, Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265  
E-mail: [mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)  
E-mail: [adawilliam@pa.gov](mailto:adawilliam@pa.gov)

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

Christy M. Appleby, Esquire  
Harrison W. Breitman, Esquire  
Jacob D. Guthrie, Esquire  
Josiah B. Harmar, Esquire  
Johnathan M. Longhurst, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923  
E-mail: [cappleby@paoca.org](mailto:cappleby@paoca.org)  
E-mail: [hbreitman@paoca.org](mailto:hbreitman@paoca.org)  
E-mail: [jguthrie@paoca.org](mailto:jguthrie@paoca.org)  
E-mail: [jharmar@paoca.org](mailto:jharmar@paoca.org)  
E-mail: [jlonghurst@paoca.org](mailto:jlonghurst@paoca.org)  
E-mail: [OCA25PPLBRC@paoca.org](mailto:OCA25PPLBRC@paoca.org)

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

Elizabeth Marx, Esquire  
Ria M. Pereira, Esquire  
John W. Street, Esquire  
Lauren N. Berman, Esquire  
Levi A. Phillips, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
E-mail: [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  
E-mail: [jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
*Counsel for CEO*

Daniel A. Garcia, Esquire  
Brian Pulito, Esquire  
Sarah M. Rambin, Esq  
Steptoe and Johnson, PLLC  
1 PPG Place, Suite 3300  
Pittsburgh, PA 15222  
E-mail: [daniel.garcia@steptoe-johnson.com](mailto:daniel.garcia@steptoe-johnson.com)  
E-mail: [brian.pulito@steptoe-johnson.com](mailto:brian.pulito@steptoe-johnson.com)  
E-mail: [Sarah.Rambin@Steptoe-johnson.com](mailto:Sarah.Rambin@Steptoe-johnson.com)  
*Counsel for Customer-Generator Coalition*

Brad & Jennifer Woolley  
2914 Hodle Ave  
Easton, PA 18045  
E-mail: [jwoolley4@rcn.com](mailto:jwoolley4@rcn.com)

Devin McDougall, Esquire  
Logan Welde, Esquire  
Lauren Otero, Esquire  
Earthjustice  
1617 John F. Kennedy Blvd., Suite 2020  
Philadelphia, PA 19103  
E-mail: [dmcDougall@earthjustice.org](mailto:dmcDougall@earthjustice.org)  
E-mail: [lwelde@cleanair.org](mailto:lwelde@cleanair.org)  
E-mail: [lotero@cleanair.org](mailto:lotero@cleanair.org)  
*Counsel for Energy Justice Advocates*

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

Daniel B. Markind, Esquire  
Mitchell H. Kizner, Esquire (*Pro Hac Vice*)  
Flaster Greenberg, PC  
1717 Arch Street, Suite 3300  
Philadelphia, PA 19103  
E-mail: [Daniel.markind@flastergreenberg.com](mailto:Daniel.markind@flastergreenberg.com)  
E-mail: [Mitchell.Kizner@flastergreenberg.com](mailto:Mitchell.Kizner@flastergreenberg.com)  
*Counsel for Dimension PA 1 LLC*

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

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

Deanne M. O'Dell, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
E-mail: [dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)

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

Todd S. Stewart, Esquire  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
E-mail: [tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)  
*Counsel for Professional Dairy Managers of Pennsylvania*

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

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

Judith D. Cassel, Esquire  
Whitney E. Snyder, Esquire  
Micah R. Bucy, Esquire  
Kathryn C. Read-Fisher, Esquire  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
E-mail: [jdcassel@hmslegal.com](mailto:jdcassel@hmslegal.com)  
E-mail: [wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)  
E-mail: [mrbcy@hmslegal.com](mailto:mrbcy@hmslegal.com)  
E-mail: [kcr@hmslegal.com](mailto:kcr@hmslegal.com)  
*Counsel for SEF*

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

Adeolu A. Bakare, Esquire  
Victoria A. Geddis, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street P.O. Box 1166  
Harrisburg, PA 17108-1166  
E-mail: [abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
E-mail: [vgeddis@mcneeslaw.com](mailto:vgeddis@mcneeslaw.com)  
*Counsel for PPLICA*

Rik Bhattacharyya  
310 Crest Dr.  
Clarks Green, PA 18411  
E-mail: [rik.bt.66@gmail.com](mailto:rik.bt.66@gmail.com)

**VIA FIRST-CLASS MAIL**

Safiyah Junaid  
216 Magic Mountain Rd.  
Henryville, PA 18332

Dated: December 7, 2025



---

Devin T. Ryan