

December 29, 2025

**Via E-Filing**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Re: Petition of PPL Electric Utilities Corporation for Approval of its Second Distributed Energy Resources Management Plan, Docket No. P-2024-3049223; **Joint Solar Parties' Answer to Emergency Petition**

Dear Secretary Homsher:

Please find attached for filing in the above-captioned matter the Joint Solar Parties' Answer to the Emergency Petition for Clarification filed by PPL Electric Utilities on December 26, 2025 in the above captioned matter.

Please do not hesitate to contact me at (202) 213-1672 if I can provide anything further, and thank you for your assistance.

Respectfully submitted,



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cc: Service List  
The Honorable John M. Coogan  
Office of Special Assistants

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for	:	
Approval of its Second	:	Docket No. P-2024-3049223
Distributed Energy Resources	:	
Management Plan	:	

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**ANSWER TO EMERGENCY PETITION FOR CLARIFICATION**

Pursuant to 52 Pa. Code §§ 5.61 and 5.572, the American Home Contractors, Inc. (“AHC”), the Solar Energy Industries Association (“SEIA”), SolarEdge Technologies, Inc. (“SolarEdge”), Sun Directed, Tesla, Inc. (“Tesla”) and Trinity Solar, LLC (“Trinity Solar”) (referred to collectively as the Joint Solar Parties, or “JSPs”),<sup>1</sup> by and through their Counsel, hereby respectfully submit their Answer to the Emergency Petition for Clarification filed by PPL Electric Utilities (“PPL” or the “Company”) on December 26, 2025.

On December 18, 2025, the Office of Consumer Advocate (“OCA”) filed a Petition for Reconsideration and/or Clarification (“OCA Petition”) of the Commission’s Opinion and Order entered on December 3, 2025 (“December 3<sup>rd</sup> Order”). The JSPs also filed a Petition on December 18<sup>th</sup> for Clarification and Stay/Supersedeas of the Commission’s December 3<sup>rd</sup> Order (“JSPs’ Clarification/Stay Petition”) “pending resolution of any appellate proceedings and any required proceedings on remand.”<sup>2</sup> Per the JSPs’ Petition, the Commission’s issuance of a stay preserves the status quo – which in the context of this case means at a minimum that PPL has ceased installing PPL-owned management and control devices in customer and third-party-owned inverters, and ceased conditioning interconnection of such inverters on the inverters’ meeting PPL’s testing for

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<sup>1</sup> The composition of the JSPs is subject to change.

<sup>2</sup> See e.g., JSPs’ Petition for Clarification and Stay/Supersedeas, p. 21.

compatibility with its devices.<sup>3</sup>

On December 24, 2025, the Commission issued an Opinion and Order (“December 24<sup>th</sup> Order”) which held:

[W]e shall grant reconsideration of [OCA’s] Petition and the [JSPs’] Clarification/Stay Petition, within the meaning of Pa.R.A.P. 1701(b)(3), pending review of, and consideration on, the merits of the Petitions.<sup>4</sup>

December 24<sup>th</sup> Order, p. 2.

The Commission’s Ordering Paragraph stated:

**IT IS ORDERED:** That the Petition for Reconsideration and/or Clarification, filed by the Office of Consumer Advocate, and the Petition for Clarification and Stay/Supersedeas, filed by [the JSPs] on December 18, 2025, are hereby granted, pending further review of, and consideration on, the merits.

*Id.*, p. 3 (emphasis added).

In its December 26<sup>th</sup> Emergency Petition, PPL now asks the Commission to “clarify” that the Commission’s December 24<sup>th</sup> grant of the JSPs’ Petition for Stay/Supersedeas “pending further review of, and consideration on, the merits,”<sup>5</sup> “did not grant a stay or supersedeas pending review and consideration of the merits...”<sup>6</sup>

PPL’s Emergency Petition is nonsensical and should be denied.

PPL attempts to argue that the Commission’s use of the phrase “within the meaning of Pa.R.A.P. 1701(b)(3)” means that the Commission intended only to grant OCA’s Petition for Reconsideration and/or Clarification and did not intend to grant the JSPs’ Petition for Stay or Supersedeas. PPL errs.

The Commission properly referred to Pa.R.A.P. 1701(b)(3) to make clear that by granting

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<sup>3</sup> *Id.*, p. 18.

<sup>4</sup> December 24<sup>th</sup> Order, p. 2.

<sup>5</sup> *Id.*, p. 3.

<sup>6</sup> December 26<sup>th</sup> Letter from Devin T. Ryan, Counsel to PPL, to Secretary Homsher.

a petition for reconsideration, it was timely suspending the Commonwealth Court’s jurisdiction to review the Commission’s December 3<sup>rd</sup> Order on the merits,<sup>7</sup> which jurisdiction the JSPs invoked by their having timely filed a Petition for Review with the Commonwealth Court.<sup>8</sup> Pa.R.A.P. 1701(b)(3) provides that a timely order by the Commission granting reconsideration of its order tolls the thirty-day period for filing a petition for appellate review, and renders inoperative a petition for such review; and that the thirty-day period for filing for appellate review begins to run anew after the entry of the Commission’s decision on reconsideration.

Further, the JSPs understand the Commission’s discussion concerning the JSPs’ Petition for a Stay and its reference to Pa.R.A.P. 1781 to be making clear that a Commission grant of reconsideration and tolling of the thirty-day time period for filing a petition for appellate review would not by itself stay the Commission’s December 3<sup>rd</sup> Order; and further, that a Court is generally not empowered to stay or supersede a Commission Order unless and until the Commission first declines to do so itself. Pa.R.A.P. 1781(a). Rather, as the Commission notes on page 2 of its December 24<sup>th</sup> Order, a party must timely file a petition seeking a stay or supersedeas, and the Commission must grant such request, for a stay to occur. The JSPs timely filed their Petition for Stay/Supersedeas and Clarification, and the Commission granted the JSPs request in its December 3<sup>rd</sup> Order.

Thus, nothing in the Commission’s December 24<sup>th</sup> Order undermines or conflicts with the Commission’s carefully crafted Ordering Paragraph stating that, simultaneously with its timely granting OCA’s Petition for Reconsideration and/or Clarification, it was also granting the JSPs’ Petition for Clarification and Stay/Supersedeas “pending further review of, and consideration on

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<sup>7</sup> Pa.R.A.P. 1701(b)(3) provides that the Commission’s timely order granting reconsideration renders inoperative the JSPs’ petition for judicial review; and begins to run anew after the entry of the Commission’s decision on reconsideration.

<sup>8</sup> *American Home Contractors, et al. v. PUC* (1667 CD 2025).

the merits.”<sup>9</sup> Indeed, the JSPs understand the Commission’s distinction between “review” and “consideration” as meant to underscore that its stay of its December 3<sup>rd</sup> Order will remain intact until conclusion of both the Commonwealth Court’s further review of the Commission’s Order and the Commission’s reconsideration of its own Order.

Any other outcome -- that would permit PPL to resume installing its devices on January 1, 2026, or to launch its Second DER Management Program on January 3, 2026 per a tariff supplement it may file on or before January 2, 2026, which Program either or both the Commission and/or the Commonwealth Court could alter or strike -- would fail to conserve the tribunals’, the parties’, or the public’s resources.

Based on the foregoing, PPL’s Emergency Petition should be denied.

Respectfully submitted,



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Date: December 29, 2025

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<sup>9</sup> December 24<sup>th</sup> Order, p. 3.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing upon the parties listed below via electronic mail and/or hand-delivery, in accordance with the requirements of 52 Pa. Code § 154 (relating to service by a party):

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Dated this 29<sup>th</sup> day of December, 2025

/s/ Bernice I. Corman