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December 31, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RE: Petition of PPL Electric Utilities Corporation For Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan; Docket No. M-2025-3057329

Dear Secretary Homsher:

Attached for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of the PP&L Industrial Customer Alliance (“PPLICA”), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', written over a horizontal line.

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

Counsel to the PP&L Industrial Customer Alliance

c: Administrative Law Judge Steven K. Haas (via e-mail)
Administrative Law Judge Emily A. Farren (via e-mail)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing documents upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA EMAIL

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Adeolu A. Bakare

Counsel to the PP&L Industrial Customer
Alliance

Dated this 31st day of December 2025, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
For Approval of its Act 129 Phase V Energy : Docket No. M-2025-3057329
Efficiency and Conservation Plan :

**PETITION TO INTERVENE
OF THE PP&L INDUSTRIAL CUSTOMER ALLIANCE**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Sections 5.71 through 5.74 and Section 5.61(a) of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71-5.74 and 52 Pa. Code § 5.61(a), the PP&L Industrial Customer Alliance hereby files this Petition to Intervene in response to the above-captioned filing of PPL Electric Utilities Corporation ("PPL" or "Company").

On December 1, 2025, PPL petitioned the Commission for approval of the Company's Phase V Energy Efficiency & Conservation ("EE&C") Plan ("Phase V Plan"). PPL's Petition for Approval of its Phase V Plan ("Petition") outlines PPL's proposal to address the requirements of Act 129, the PUC's Phase V Implementation Order entered on June 18, 2025, at Docket No. M-2025-3052826 ("Implementation Order"), through programs designed to achieve an overall 828,231 MWh consumption reduction, and a 151 MW peak demand reduction. *See* Petition, p. 8.

The proposed Phase V Plan portfolio includes Residential, Resource Constrained (Low-Income), and Business (Non-Residential) programs. The Business (Non-Residential) program includes separate Efficient Energy and Custom components for Small Commercial and Industrial ("C&I") and Large C&I customers, respectively. *See id.* at 11-12.

As with the Phase IV EE&C Plan, PPL proposes to recover all costs through a fully reconcilable, non-bypassable charge under Section 1307 of the Public Utility Code. *See id.* at 19. The total proposed charges for the Large C&I customer class are \$68,612,328, or approximately 22% of total costs for PPL's Phase V Plan. *See* Petition, Exhibit 1, p. 19.

For the proposed non-bypassable charge, or Phase V Act 129 Compliance Rider ("ACR V"), PPL intends to establish separate recovery charges for each customer class in proportion to the cost of the programs targeting that class. *See* Petition, p. 18. For multi-class programs, PPL proposes to allocate costs using an allocation factor (*i.e.*, a percentage equal to the actual EE&C costs directly assigned to each customer class divided by the actual EE&C costs assigned to all customer classes). *See id.*

As a result, PPL's Phase V Plan costs and program measures may impact the rates and services of PPL's largest customers. It is therefore imperative that PPL implement its Phase V EE&C Plan in a just and reasonable manner, consistent with Act 129, the Implementation Order, and all applicable statutes and regulations.

In support of its Petition to Intervene, PPLICA asserts the following:

1. PPLICA is an ad hoc association of energy-intensive commercial and industrial customers receiving electric service in PPL's service territory, primarily under Rate Schedules LP-4 and LP-5, as well as available riders. PPLICA members collectively consume over 971 million kWh of electricity each year in manufacturing and other operational processes, and these electric costs are a significant element of their respective costs of operation. Any modification to PPL's electric rates may impact PPLICA members' cost of operations.

2. The names and address of PPLICA's attorneys are:

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3. For purposes of this proceeding, PPLICA includes the members listed in Appendix A hereto. As necessary, PPLICA will update Appendix A during the course of this proceeding to reflect any changes in its membership.

4. PPLICA members are concerned with issues regarding the terms and conditions of their electricity service, and, as a result, have been actively involved in numerous PPL proceedings, including fully participating in the adjudication of PPL's Phase I Phase II, Phase III, and Phase IV EE&C Plans and regularly attending PPL's EE&C Plan stakeholder meetings. The Commission's final disposition of PPL's Phase V Plan may also directly affect the rates that the Company imposes on PPLICA members for service.

5. PPLICA members thus have an interest in this proceeding that is not represented by any other party of record; consequently, PPLICA satisfies the standards for intervention under Section 5.72 of the Commission's Regulations, 52 Pa. Code § 5.72.

WHEREFORE, the PP&L Industrial Customer Alliance respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene, provide PPLICA with full-party status in this proceeding, and grant such other relief as it deems necessary.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Counsel to the PP&L Industrial Customer
Alliance

Dated: December 31, 2025

APPENDIX A

PP&L INDUSTRIAL CUSTOMER ALLIANCE

Air Products and Chemicals, Inc.

Benton Foundry

Hercules Cement Company

Hydro Extrusions, Inc.

Messer LLC

TIMET North America

