

January 5, 2026

**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

Dear Secretary Homsher:

Please find attached for filing in the above-captioned matter the Joint Solar Parties' Motion to Strike the compliance tariff supplement filed by PPL Electric Utilities Corporation on January 2, 2026.

Please contact me at (202) 213-1672 if I can provide anything further.

Respectfully submitted,



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

## 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 5<sup>th</sup> day of January, 2026

/s/ Bernice I. Corman

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**NOTICE TO PLEAD**

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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Dated: January 5, 2026

**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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**JOINT SOLAR PARTIES’ MOTION TO STRIKE THE GENERAL TARIFF FILED BY  
PPL ELECTRIC UTILITIES CORPORATION ON JANUARY 2, 2026**

AND NOW, come the American Home Contractors, Inc. (“AHC”), Enphase Electric, Inc. (“Enphase”), 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”), by and through their Counsel, and file, pursuant to the Pennsylvania Public Utility Commission’s (“Commission’s”) regulations at 52 Pa. Code § 5.103, this Motion to Strike the General Tariff filed by PPL Electric on January 2, 2026 that claims an effective date of January 3, 2026.

In support of the foregoing, the JSPs state as follows:

**I. BACKGROUND**

- a. PPL Electric is a public utility that provides electric distribution service and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission. PPL Emergency Petition, Introduction, ¶ 1.
- b. The JSPs are an ad hoc group of entities, all of whom are in the business of installing solar energy and battery storage equipment, manufacturing said equipment, or providing grid services via aggregation of said equipment, or are a trade association representing same. JSPs’ Main Brief, p. 1.

- c. On May 20, 2024, PPL Electric filed a Petition requesting the Commission’s approval of tariff modifications and other authorizations that are needed to implement PPL Electric’s Second DER Management Plan, pursuant to Paragraph 62 of the Joint Petition for Settlement of All Issues approved by the Commission at Docket No. P-2019-3010128.
- d. On August 12, 2024, PPL Electric, OCA, OSBA, SEF and the JSPs filed a Joint Petition for an Extension of PPL Electric’s DER Management Pilot Program Period at Docket No. P-2019-3010128 pursuant to 52 Pa. Code § 5.41 and Paragraph 62 of the Joint Petition for Settlement of All Issues approved in said docket (“Settlement ¶ 62”), requesting an extension of the Company’s currently effective Pilot Program period beyond its scheduled sunset date of March 21, 2025, until 30 days after the Commission’s Final Order is entered in the instant proceeding.<sup>1</sup> The Commission granted the Joint Petition.<sup>2</sup>
- e. On June 30, 2025, Administrative Law Judge John M. Coogan issued a recommended decision (“R.D.”) recommending that the Petition filed by PPL Electric Utilities Corporation for Approval of its Second Distributed Energy Resources Management Plan be denied. R.D. Ordering Section, ¶ 1.
- f. On December 3, 2025, the Commission issued its Final Order, which granted the Company’s DER Management Petition subject to two modifications not material to this Motion (“December 3<sup>rd</sup> Order”).

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<sup>1</sup> Joint Petition for an Extension of PPL Electric Utilities Corporation’s Distributed Energy Resources Management Pilot Program Period, filed August 12, 2024 in Docket No. P-2019-3010128, *Petition of PPL Electric Utilities Corporation for Approval of Tariff Modifications and Waivers of Regulations Necessary to Implement its Distributed Energy Resources Management Plan*.

<sup>2</sup> Opinion and Order entered September 12, 2024 at Docket No. P-2019-3010128.

- g. On December 18, 2025, the Office of Consumer Advocate (“OCA”) filed a Petition for Reconsideration and/or Clarification (“OCA Petition”), and the JSPs filed a Petition for Clarification and Stay/Supersedeas (“JSP Clarification/Stay Petition), of the Commission’s December 3<sup>rd</sup> Order.
- h. On December 24, 2025, the Commission issued an Opinion and Order granting the OCA and JSP petitions “pending further review of, and consideration on, the merits” (“December 24<sup>th</sup> Order”).
- i. On Friday, December 26, 2025 at 4:07 P.M., PPL filed an Emergency Petition for Clarification of the Commission’ December 24<sup>th</sup> Order (“Emergency Petition”) that requested that the Commission shorten the deadline for OCA and the JSPs to answer PPL’s Emergency Petition from 10 calendar days of service to Monday, December 29, 2025; and that the Commission issue an Order no later than Wednesday December 31, 2025 to clarify that its December 24<sup>th</sup> Order “did not grant a stay or supersedeas pending review and consideration of the merits of the Office of Consumer Advocate’s Petition for Reconsideration and/or Clarification and the Joint Solar Parties’ Petition for Clarification and Stay/Supersedeas.” PPL’s December 26, 2025 Cover Letter to its Emergency Petition (emphasis theirs).
- j. In its Emergency Petition, PPL argued that because the Commission held that the OCA Petition and JSP Clarification/Stay Petition were granted pending further review of, and consideration on, the merits within the meaning of Pa. R.A.P. 1701(b)(3), and because Rule 1701(b)(3) deals only with the granting of reconsideration, the Commission’s December 24<sup>th</sup> Order did not grant a stay. PPL Emergency Petition, ¶¶ 22 – 24.

- k. Despite the Commission’s stay of its December 3<sup>rd</sup> Order approving PPL’s Petition and associated tariff modifications, PPL stated in its Emergency Petition that it was “currently ... set to launch its Second DER Management Plan on January 3, 2026,”<sup>3</sup> and that it intended to file its Rule 12 compliance tariff supplement on January 2, 2026, to become effective on one day’s notice, as PPL had requested in its Second DER Management Petition. PPL Emergency Petition, p. 3.
- l. The Commission did not establish a deadline of December 29, 2025 for the OCA and the JSPs Answers;<sup>4</sup> nor did the Commission issue an Order on or before December 31<sup>st</sup> as requested by PPL suspending, modifying, or otherwise addressing the stay ordered in its December 25<sup>th</sup> Opinion and Order.
- m. On January 2, 2026, PPL provided notice of its issuance of its January 2, 2026 tariff, that contained a purported effective date of Saturday, January 3, 2026, also a date on which the Commission is closed for business.

## **II. ARGUMENT**

- a. The Commission’s December 24<sup>th</sup> Order stayed its December 3<sup>rd</sup> Order, which approved PPL’s Second DER Management Plan and associated tariff, pending further review of, and consideration on, the merits.
- b. PPL’s January 2<sup>nd</sup> tariff filing and purported effective date of January 3<sup>rd</sup> are therefore unauthorized and should be struck, as approval of PPL’s Second DER Management Plan and its associated tariff were stayed by the Commission’s December 24<sup>th</sup> Order.

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<sup>3</sup> PPL Emergency Petition, p. 2.

<sup>4</sup> OCA and the JSPs voluntarily filed Answers on December 29, 2025, both of which, among other things, stated that the plain language of the Commission’s December 24<sup>th</sup> Order granted a stay/supersedes of its December 3<sup>rd</sup> Order.

- c. PPL's January 2<sup>nd</sup> tariff should also be struck as the filing package accompanying it, which includes PPL's January 2<sup>nd</sup> Cover Letter ("PPL's January 2<sup>nd</sup> Cover Letter" or "Cover Letter"), improperly contains legal argument:
- i. PPL's Cover Letter reiterates its legal argument that the Commission's stay or supersedeas was unlawful, an argument that has no place in a tariff filing required by 52 Pa. Code § 75.13.
  - ii. PPL's Cover Letter also erroneously, argues that "the Commission has not yet ruled on PPL Electric's Emergency Petition for Clarification, in which the Company requested that the Commission issue an order by December 31, 2025, affirmatively declaring that no stay or supersedeas was granted by its Tolling Order," an argument that also has no place in a tariff filing required by 52 Pa. Code § 75.13.
  - iii. PPL's Cover Letter also inappropriately argues that "the Commission did not and could not have lawfully granted a stay or supersedeas through its [so-called] Tolling Order entered December 24, 2025" because it "did not engage in any analysis of the *Process Gas* standards with supporting findings of fact and conclusions of law, which would be required to grant any stay or supersedeas of the Final Order."
- d. PPL's Tariff and accompanying Cover Letter should be struck because the filing package contains argument that does not conform with 52 Pa. Code §§ 5.501 and 5.502 (pertaining to form and contents of briefs, and filing procedures), is unauthorized, and has been waived, *See, e.g., Hess v. Pa. PUC*, 107 A. 3d 246, 266 (Pa. Cmwlth. 2014); because the Commission unquestionably has full power and

authority pursuant to 66 Pa.C.S. § 501 to manage proceedings before it as it requires; and because PPL has not justified the need for it to “proceed smoothly and without interference or disruption”<sup>5</sup> – that is, to immediately commence implementation of its Second DER Management Program upon termination of its Pilot Program despite the Commission’s issuance of a stay on its authorization of said Program.<sup>6</sup>

### **III. CONCLUSION**

WHEREFORE, the JSPs respectfully request that the Commission strike the tariff package filed by PPL Electric Utilities Corporation on January 2, 2026, and disregard the legal argument contained in the Cover Letter included in the tariff package, as described in this Motion; and that the Commission make clear that the tariff supplement filed by PPL on January 2, 2026 with a claimed effective date of January 3, 2026, has no binding legal effect.

Respectfully submitted,

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<sup>5</sup> PPL Emergency Petition, p. 3.

<sup>6</sup> In their Clarification/Stay Petition, the JSPs’ stated that in this period in which PPL’s authorization to proceed with implementing its Second DER Management Plan is stayed, “status quo,” or continued implementation of PPL’s Pilot/First DER Management Plan, means PPL has ceased testing inverters, has ceased installing its Devices in customers’ or third party-owned inverters, and has ceased testing for compatibility with PPL’s monitoring and management device. JSPs’ Clarification/Stay Petition, ¶ 24.b. In their Reply to PPL’s Answer to the JSPs’ Clarification/Stay Petition, the JSPs stated “[i]t is fair to interpret the parties’ agreed-upon extension of the Pilot as permitting PPL to extend the last year of its Pilot, which would include continuing to install its Devices until it hit its last authorized installation cap.” On further reflection, the JSPs state: Pursuant to Settlement ¶ 62, the mechanism under which the parties jointly moved simply to extend PPL’s Pilot beyond its scheduled sunset date of March 21, 2025, PPL expressly reserved the right only to “... request that Commission continue the existing remote active management program until litigation over a petition filed pursuant to Paragraph 62 concludes.” (emphasis added.) Thus, to be clear, Settlement ¶ 62, and the parties’ joint petition to extend the Pilot period thereunder, spoke only to PPL’s continuing to actively manage customers’ and third-party-owned inverters beyond March 31 2025. Neither Settlement ¶ 62, nor the parties’ agreed-upon extension, nor the Commission’s Order approving the parties’ joint petition to extend, said anything about PPL’s continuing to install additional Devices, or to the Pilot’s annual installation cap re-setting, or to anything other than PPL’s continuing active management under its existing program.



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