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February 15, 2026

VIA ELECTRONIC FILING

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

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

Dear Secretary Homsher:

Enclosed for filing please find the Solar Energy Industries Association and the Coalition for Community Solar Access (the "Joint Solar Advocates") Answer in Support of PPL's Motion to Sever the Maximum Registered Peak Load Proposal from the Base Rate Case in the above-captioned proceeding.

Copies are being served in accordance with the attached Certificate of Service. Please contact me with any questions or concerns.

Very truly yours,



Alan M. Seltzer

AMS/psm
Enclosure
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

Docket Nos. R-2025-3057164

v.

PPL Electric Utilities Corporation

**SOLAR ENERGY INDUSTRIES ASSOCIATION AND THE COALITION FOR
COMMUNITY SOLAR ACCESS ANSWER IN SUPPORT OF PPL ELECTRIC
UTILITIES CORPORATION’S MOTION TO SEVER THE MAXIMUM
REGISTERED PEAK LOAD PROPOSAL FROM THE BASE RATE CASE**

The Solar Energy Industries Association (“SEIA”) and Coalition for Community Solar Access (“CCSA”) (together the “Joint Solar Advocates”), by and through their counsel, file this Answer in Support of PPL Electric Utilities Corporation’s (“PPL”) Motion To Sever The Maximum Registered Peak Load Proposal From The Base Rate Case (“Motion”) in the above-captioned proceeding before the Pennsylvania Public Utility Commission (“Commission”). In support of the Motion, the Joint Solar Advocates answer as follows:

I. Reasons to Grant the Motion

1. The JSA generally concurs with the averments set forth in the Motion’s Introduction and Background on the issue that has necessitated the Motion. Providing additional time for the JSA to perform discovery and respond to PPL’s significant augmentation and material corrections to its Direct Testimony via its recently filed Rejoinder Testimony is imperative if the Maximum Registered Peak Load Proposal (“MRPL”) is to be fairly litigated before the Administrative Law Judges (“ALJs”) and the Pennsylvania Public Utility Commission (“Commission”).¹ It is also critical that severing the MRPL issue from the balance of the pending

¹ Notwithstanding the JSA’s support for the Motion under the terms and relief requested in this Answer, the JSA fully intends to continue settlement negotiations with PPL and other parties in an attempt to resolve their differences on the MRPL and related issues in this proceeding. The JSA respectfully requests that if the Motion is granted by the ALJs, they acknowledge in that order that the relief granted is without prejudice to any settlement discussions that may be currently underway and/or any settlement of the MRPL issues that may later occur.

PPL base rate proceeding due to PPL's late and substantial error corrections (i) not unduly postpone the litigation and resolution of this issue; (ii) not significantly expand the litigation process in the severed proceeding; and (iii) not materially increase the parties' costs of resolving this issue. At bottom, additional time not currently in the litigation schedule is needed for the JSA and potentially other impacted parties to conduct discovery on the newly presented PPL facts and analyses, allow JSA and other parties an opportunity to respond to this new testimony, allow PPL a final opportunity to respond to the JSA's and other parties' new testimony, and finally conduct hearings and briefing. Due to the statutory time constraints associated with general rate cases, the JSA understands that additional time needed to fully litigate the MRPL issue cannot now be added to the existing schedule. However, the MRPL issues were raised by PPL in a general rate proceeding and are appropriate for disposition with the same concise and efficient scheduling that is a standard part of such proceedings.

2. After multiple rounds of served testimony, PPL served a 14-page rejoinder statement from witness Andrew Castanaro – longer than the witness' direct testimony – that for eight (8) of the 14-pages does not focus on the JSA's surrebuttal testimony. Rather, Mr. Castanaro's rejoinder testimony primarily corrects certain numbers relating to, among other things, the cancellation rate of customer-generator projects, related excess generation, etc. These "corrections" and the new testimony regarding their claimed implications were the subjects of JSA's initial discovery to PPL and the direct testimony of JSA witness Kevin Lucas filed months ago.

3. The JSA and its witnesses painstakingly evaluated all of PPL's direct testimony on its MRPL proposal via extensive discovery leading to detailed Direct, Rebuttal and Surrebuttal testimony that critiqued the MRPL proposal and recommended adjustments to the proposal that

would resolve the Company's and customers' concerns regarding the future of customer-generators to operate in the Commonwealth.

4. PPL witness Castanaro's rejoinder testimony is undeniably new PPL claimed support and justification for its MRPL proposal that the JSA is just now seeing for the first time and obviously has had no time to propound discovery on, evaluate and ultimately prepare a written response to.

5. Importantly, and as noted above, PPL witness Castanaro's rejoinder testimony and corrections are largely directed to JSA witnesses Lucas' and Barnes' previously submitted testimony, that included critiques and recommendations on adjusting the MRPL proposal, with limited responses to Customer Generator Coalition ("CGC") witness Sharfman and Walmart witness Lyon. It is the JSA that will be most materially and adversely affected and deprived of its procedural due process rights if the scheduled evidentiary hearings next week proceed on the MRPL issues.

6. In fact, the JSA cannot possibly be in a position to conduct the detailed and rigorous analysis required to properly and fully address the new testimony and defense of the MRPL reflected in Mr. Castanaro's rejoinder testimony in time for the hearings scheduled for next week, in part because, absent placing the MRPL issues on a new procedural schedule, Mr. Lucas and Mr. Barnes will need to be in the hearing room waiting to be called as witnesses and be subjected to cross examination on issues that have now been newly defined and presented by PPL on the MRPL proposal on the eve of hearings.

7. Fortunately, PPL and the JSA agree that a change to the existing litigation schedule is necessary to protect the JSA's and other parties' procedural due process rights

resulting from PPL's corrections of its Direct testimony at the final stage of filing rejoinder testimony.

8. Fundamental principles of equity and fairness – aside from affording the JSA its constitutional procedural due process rights – require that (i) the JSA witnesses be excused from attending the scheduled evidentiary hearings, offering any testimony and/or being cross-examined and (ii) a new litigation schedule be established allowing appropriate time to conduct discovery, prepare responsive testimony and, if necessary, conduct new evidentiary hearings addressing the MRPL and related customer-generator issues.

9. The JSA requests that any new schedule established in a severed proceeding adhere to expanding the remaining rejoinder phase of this proceeding to allow discovery of new PPL corrected data and updated analyses/positions so that the JSA is not disadvantaged by delay in resolution of these MRPL issues, consistent with the need to protect the parties' constitutional procedural due process rights. The record to date on the MRPL issue should become the record of the severed proceeding, as supplemented by the response to PPL's rejoinder testimony by the JSA and other parties and finally by PPL as noted above, and the evidentiary record of that proceeding should be completed as expeditiously as possible. In addition to the record being ported into a severed proceeding, Party's settlement positions should extend into the severed proceeding so any progress made in settlement to date is not lost.

WHEREFORE, the Joint Solar Advocates respectfully request that the ALJs (i) grant PPL's Motion To Sever The Maximum Registered Peak Load Proposal From The Base Rate Case, (ii) direct the establishment of a schedule to complete the litigation of the MRPL issues that recognizes the advanced stage of the litigation of those issues to date, while protecting the due process rights of parties with an interest in this matter, (iii) excuse PPL witness Castanaro, JSA witnesses Kevin Lucas and Justin Barnes and other witnesses who have addressed any issues

related to the MRPL proposal and related matters in their testimony from attending the hearings and standing for cross-examination next week and (iv) grant such other relief as may be just and reasonable.

Respectfully submitted,



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Dated: February 15, 2026

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 EMAIL ONLY

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