



One PPG Place, Suite 3300
Pittsburgh, PA 15222
412-504-8010
Fax 412-504-8011
www.steptoe-johnson.com

Daniel Garcia
Daniel.Garcia@Steptoe-Johnson.com
412-504-8128

February 15, 2026

Via Electronic Filing

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

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

Dear Secretary Homsher:

Please find enclosed for filing on behalf of the Customer-Generator Coalition, (“CGC”) is the Answer to the PPL Electric Utilities Corporation Motion to Sever the Maximum Registered Peak Load Proposal from the Base Rate Case, in the above referenced proceeding.

Service of this document has been made upon all parties of record in accordance with the attached certificate of service.

If you have any questions, please don’t hesitate to contact my office.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Garcia', written over a horizontal line.

Daniel A. Garcia, Esq., Of Counsel
STEPTOE & JOHNSON PLLC
Counsel for Customer-Generator Coalition

CC: Hon. Christopher P. Pell, (email only)
Hon. Barbara Shadie Nause, (email only)
Legal Assistant Eric Ball (email only)
Legal Assistant Pamela McNeal (email only)
Certificate of Service

**RBEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2025-3057164
Coalition For Affordable Utility Services	:	
and Energy Efficiency in Pennsylvania	:	C-2025-3057844
Office of Small Business Advocate	:	C-2025-3057889
Office of Consumer Advocate	:	C-2025-3058130
Brad and Jennifer Wooley	:	C-2025-3057946
PP&L Industrial Customer Alliance	:	C-2025-3058271
Convergent Energy and Power LP	:	C-2025-3058300
Solar Energy Industries Association and	:	C-2025-3058251
The Coalition for Community Solar Access	:	C-2025-3058846
Rik Bhattacharyya	:	C-2025-3058982
Safiya Junaid	:	C-2025-3059151
Stacey Kimmel-Smith	:	C-2025-3059330
John Gadomski	:	
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	:	
v.	:	
	:	
	:	
PPL Electric Utilities Corporation	:	

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Answer to the PPL Electric Utilities Corporation Motion to Sever the Maximum Registered Peak Load Proposal from the Base Rate Case has been served upon the following parties of record in accordance with 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

VIA EMAIL ONLY

Kimberly A. Klock, Esq.
Michael J. Shafer, Esq.
PPL Services Corporation
645 Hamilton Street, Suite 700
Allentown, PA 18101
kklock@pplweb.com
mjshafer@pplweb.com
(*Counsel for PPL*)

Michael A. Podskoch Jr., Esq.
Adam J. Williams, Esq.
Pennsylvania Public Utility Commission and
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17120
mpodskoch@pa.gov
adawilliam@pa.gov

Devin T. Ryan, Esq.
Alice A. Wade, Esq.
Hayley E. Wilburn, Esq.
Post & Schell, P.C.
One Oxford Centre
31 Grant Street, Suite 3010
Pittsburgh, PA 15219
dryan@postschell.com
alice.wade@postschell.com
hwilburn@postschell.com
(*Counsel for PPL*)

Christy M. Appleby, Esq.
Harrison W. Breitman, Esq.
Jacob D. Guthrie, Esq.
Josiah B. Harmar, Esq.
Johnathan Longhurst, Esq.
Office of Consumer Advocate
5th Floor Forum Place
555 Walnut Street
Harrisburg, PA 17101-1923
cappleby@paoca.org
hbreitman@paoca.org
jguthrie@paoca.org
jHarmar@paoca.org
jlonghurst@paoca.org
OCA25PPLBRC@paoca.org

Ria M. Pereira, Esq.
John W. Sweet, Esq.
Elizabeth R. Marx, Esq.
Lauren N. Berman, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
rpereira@pautilitylawproject.org
jsweet@pautilitylawproject.org
emarx@pautilitylawproject.org
lberman@pautilitylawproject.org

Eric J. Epstein
4100 Hillsdale Road
Harrisburg, PA 17112
epstein@efmr.org

David B. MacGregor, Esq.
Garrett P. Lent, Esq.
Anthony DeCusatis, Esq.
Erin Kawa, Esq.
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
dmacgregor@postschell.com
glent@postschell.com
adecusatis@postschell.com
ekawa@postschell.com
(*Counsel for PPL*)

Rebecca Lyttle, Esq.
Steven C. Gray, Esq.
Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
relyttle@pa.gov
sgray@pa.gov

Levi Phillips, Esq.
Cause-PA
118 Locust Street
Harrisburg, PA 17108
pulp@pautilitylawproject.org
(*Counsel for PA Utility Law Project*)

Brad and Jennifer Woolley
2914 Hodle Ave
Easton, PA 18045
jwoolley4@rcn.com

Jaime L. Martines, Esq.
Spilman Thomas & Battle, PLLC
301 Grant Street, Suite 3440
jmartines@spilmanlaw.com
(*Counsel for Walmart*)

Rik Bhattacharyya
310 Crest Dr.
Clarks Green, PA 18411
rik.bt.66@gmail.com

Devin McDougall
Earthjustice
1617 JFK Blvd., Suite 1130
Philadelphia, PA 19103
dmcdougall@earthjustice.org
(*Counsel for Energy Justice Advocates*)

Emma H. Bast, Esq.
Jessica R. O'Neill, Esq.
Citizens for Pennsylvania's Future
1429 Walnut St, Suite 701
Philadelphia, PA 19102
bast@pennfuture.org
oneill@pennfuture.org
(*Counsel for Environmental Defense Fund,
Natural Resources Defense Council, and
PennFuture*)

Deanne M. O'Dell, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dodell@eckertseamans.com
(*Counsel for Retail Energy Supply Association*)

Todd S. Stewart, Esq.
HMS Legal LLP
501 Corporate Circle Suite 302
Harrisburg, PA 17110
tsstewart@hmslegal.com
(*Counsel for Professional Dairy Managers of
PA*)

Alan M. Seltzer, Esq.
John F. Povilaitis, Esq.
Buchanan, Ingersoll & Rooney PC
409 North Second Street, Suite 500
Harrisburg, PA 15219
alan.seltzer@BIPC.com
john.povilaitis@BIPC.com
(*Counsel for Joint Solar Advocates*)

Daniel B. Markind, Esq.
Mitchell Kizner, Esq.
Flaster Greenberg, PC
1717 Arch Street, Suite 3300
Philadelphia, PA 19103
daniel.markind@flastergreenberg.com
Mitchell.kinzer@flastergreenberg.com
(*Counsel for Dimension PA*)

Michael Zimmerman, Esq.
Environmental Defense Fund
257 Park Ave S.
New York, NY 10010
mzimmerman@edf.org
(*Counsel for Environmental Defense Fund*)

Lauren M. Burge, Esq.
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 4th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com
(*Counsel for Retail Energy Supply Association*)

Barry A. Naum, Esq.
Steven W. Lee, Esq.
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd, Suite 101
Mechanicsburg, PA 17050
bnaum@spilmanlaw.com
slee@spilmanlaw.com
(*Counsel for Walmart*)

Adeolu A Bakare, Esq.
Victoria A. Geddis, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
abakare@mcneeslaw.com
vgeddis@mcneeslaw.com
(*Counsel for PPLICA*)

Judith Cassel, Esq.
Micah R. Bucy, Esq.
HMS Legal LLP
501 Corporate Circle Suite 302
Harrisburg, PA 17110
jdcassel@hmslegal.com
mrbucy@hmslegal.com
(*Counsel for SEF*)

Susan E. Bruce, Esq.
Rebecca Kimmel, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
rkimmel@mcneeslaw.com
sbruce@mcneeslaw.com
(*Counsel for Convergent*)

Lt. Colonel Carlos S. Ramirez-Vazquez
US Army Legal Services Agency
Office of The Judge Advocate General
9275 Gunston Road (JALS-TCAP)
Fort Belvoir, Virginia 22060
carlos.s.ramirezvazquez.mil@army.mil

John J. McNutt, Esq.
Regulatory Law Counsel
US Army Legal Services Agency
Office of The Judge Advocate General
9275 Gunston Road (JALS-ELD)
Fort Belvoir, Virginia 22060
john.j.mcnutt.civ@army.mil

Renardo L. Hicks, Esq.
Bryce Beard, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
rhicks@eckertseamans.com
bbeard@eckertseamans.com

Joseph L. Vullo, Esq.
Commission of Economic Opportunity
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
(*Counsel for CEO*)

Safiyah Junaid
216 Magic Mountain Rd.
Henryville, PA 18332
snjunaid2@gmail.com

Stacey Kimmel-Smith
P.O. Box 819 Nantucket Circle
Bethlehem, PA 18015
Sek4278@gmail.com

VIA FIRST CLASS MAIL ONLY

John Gadomski
446 Bidwell Hill Rd.
Lake Ariel, PA 18436

Dated: February 12, 2026



Daniel A. Garcia (PA Attorney ID 311503)
Counsel for Customer-Generator Coalition

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2025-3057164
Coalition For Affordable Utility Services and Energy Efficiency in Pennsylvania	:	C-2025-3057844
Office of Small Business Advocate	:	C-2025-3057889
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Stacey Kimmel-Smith	:	C-2025-3059151
John Gadomski	:	C-2025-3059330
	:	
	:	
v.	:	
	:	
PPL Electric Utilities Corporation	:	

**ANSWER TO THE PPL ELECTRIC UTILITIES CORPORATION MOTION TO
SEVER THE MAXIMUM REGISTERED PEAK LOAD PROPOSAL FROM THE BASE
RATE CASE OF THE CUSTOMER-GENERATOR COALITION**

**TO DEPUTY CHIEF ADMINISTRATIVE LAW JUDGE CHRISTOPHER P. PELL AND
ADMINISTRATIVE LAW JUDGE BARBARA SHADIE NAUSE:**

Pursuant to 52 Pa. Code § 5.103 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) Regulations, Aspen Power Partners LLC, 38 Degrees North, Bollinger Solar, CEP Renewables, LLC, CVE North America, Dynamic Energy Solutions, LLC, EDPR NA Distributed Generation LLC, Encore Renewable Energy, GS Power Partners, Prospect14 LLC, Radial Power LLC, Scale Microgrids, Solar Renewable Energy, LLC, SR1 Captura Sage Holdco I, LLC, and Syncarpha Capital, LLC, collectively as the Customer-Generator Coalition (“CGC” or “Coalition”), by and through its undersigned counsel, Steptoe & Johnson PLLC, respectfully submits this Answer to the PPL Electric Utilities Corporation Motion to Sever the Maximum

Registered Peak Load Proposal from the Base Rate Case in the above-captioned proceeding initiated by PPL Electric Utilities Corporation (“PPL” or “the Company”).

PPL Electric requests severance of the MRPL proposal (“Motion”) pursuant to 52 Pa. Code § 5.103 and asserts that such relief is necessary to protect due process, avoid prejudice, and preserve the existing record. The CGC respectfully disagrees.

First, while the Company frames severance as a mechanism to protect due process, severance is not the only procedural remedy available to the Commission. The Commission retains broad authority within the existing base rate proceeding to modify hearing schedules, permit supplemental discovery, authorize limited additional testimony, or otherwise fashion relief tailored to the scope of the corrected analyses.¹ Severance is a discretionary procedural tool, not a due process mandate.² Due process requires notice and a meaningful opportunity to be heard; it does not require removal of an issue from the statutory framework in which it was introduced.³

Second, PPL controlled the preparation and timing of its September 30, 2025 base rate filing, including the development, review, and submission of all testimony, exhibits, and supporting analyses. PPL’s Direct Testimony, along with the modeling underlying the MRPL proposal, was prepared in advance of filing and necessarily underwent multiple layers of internal review, including legal, technical, and consultant evaluation prior to its initial filing on September 30, 2025. The errors later identified by Mr. Castanaro arose from materials that were within the Company’s exclusive control prior to PPL’s initial filing and were not the product of developments outside its control or newly discovered evidence originating from other parties.

¹ 66 Pa.C.S. §§ 501, 703, and 332; 52 Pa. Code § 5.224(a)(1).

² *Commonwealth v. Harvey*, 407 Pa. Super. 545, 595 A.2d 1280 (1991)

³ *Barasch v. Pennsylvania Public Utility Commission*, 104 Pa. Commonwealth Ct. 52, 81, 521 A.2d 482, 496 (1987).

The circumstances giving rise to the Company's Motion therefore stem from corrections to analyses contained in its own Direct Testimony. While the CGC does not dispute that correcting material errors is appropriate and necessary to maintain the integrity of the record, the procedural consequences of those corrections do not compel severance of the MRPL issue from the base rate case.

Third, PPL asserts that MRPL "does not affect the Company's base rate revenue increase" and therefore may be adjudicated separately. That framing is incomplete. Although the proposal may not alter the aggregate revenue PPL seeks to collect, it directly affects how that revenue is allocated among customer classes. It proposes to change which customers bear particular costs and how those customers are charged. Customer classification and cost allocation are core components of ratemaking governed by 66 Pa. C.S. §§ 1301 and 1304 and are addressed in base rate proceedings conducted under 66 Pa. C.S. § 1308. A base rate case is not limited to determining the overall revenue requirement; it also encompasses the design and distribution of rates among classes.⁴

The MRPL proposal redefines customer classification based on alleged inter-class cost impacts arising from the magnitude and treatment of net metering credits. Those credits are not discretionary tariff mechanisms or automatic adjustment surcharges; they are statutory entitlements created by the General Assembly under the Alternative Energy Portfolio Standards Act ("AEPS Act"), 73 P.S. §§ 1648.1–1648.8, and implemented through binding Commission regulations at 52 Pa. Code Chapter 75, including § 75.13. See 73 P.S. § 1648.5 (mandating net metering for eligible customer-generators). The Company's economic modeling relies upon the existence and allocation of those legislatively mandated credits within the current rate structure.

⁴ See *Popowsky v. Pa. PUC*, 13 A.3d 583, 593 (Pa. Cmwlth. 2011); *Pa. Indus. Energy Coalition v. Pa. PUC*, 653 A.2d 1336, 1350 (Pa. Cmwlth. 1995).

In doing so, it necessarily depends upon existing class relationships and cost distribution assumptions embedded in the broader rate design.

The Commonwealth Court has cautioned against evaluating interrelated ratemaking components in isolation where they are part of a unified rate structure. *Pa. Indus. Energy Coalition*, 653 A.2d at 1350. Here, PPL voluntarily introduced MRPL in its base rate filing and justified it through modeling grounded in the current allocation of costs among classes. To sever the proposal now would fragment those interdependent elements and require the Commission to assess customer classification divorced from the rate structure that forms the basis of the Company's justification.

In short, the Company cannot rely on existing inter-class cost relationships to support MRPL while simultaneously contending that the proposal may be detached from the comprehensive rate proceeding in which those relationships are evaluated. The structural integrity of the ratemaking process requires that classification decisions premised upon inter-class cost impacts be examined within the same proceeding in which the underlying rate design is reviewed.⁵

Fourth, the Company contends that severance would preserve the existing record and avoid starting "from scratch." While the CGC acknowledges that substantial record development has occurred, the transferability of testimony and exhibits does not resolve the far more consequential issue: the disruption of the statutory suspension framework governing this case and the material economic harm flowing from prolonged regulatory uncertainty.

Customer-generators within PPL's service territory have structured investments in reliance upon the existing statutory and regulatory framework governing net metering and customer classification. Many submitted interconnection applications in 2023 and early 2024 and did not

⁵ *Phila. Suburban Transp. Co. v. Pa. Pub. Util. Com.*, 3 Pa. Commw. 184, 281 A.2d 179 (1971); *United States Steel Corp. v. Pa. Pub. Util. Com.*, 37 Pa. Commw. 173, 390 A.2d 865 (1978);

receive Interconnection Impact Reviews (“IIRs”) until January 2026, after extended delays. Those IIRs triggered significant deposit obligations payable within forty-five days. These obligations are substantial and immediate, requiring capital commitments for engineering, equipment procurement, construction mobilization, and financing. The combination of prolonged interconnection timelines and compressed deposit deadlines has already placed significant financial pressure on projects awaiting regulatory clarity.

Simultaneously, numerous projects in advanced stages of development have paused or slowed construction due to the uncertainty created by the proposed redefinition of MRPL. Developers and lenders must account for the risk that customer classification may change after substantial capital has been committed. That uncertainty has tangible effects: projects have been cancelled, development has stalled, and attrition from the interconnection queue is occurring. Continued delay only increases the likelihood that additional projects will be withdrawn or abandoned.

Severance would remove the MRPL proposal from the defined statutory timeline governing this rate case and place it into a separate proceeding without comparable time constraints, thereby extending the period of regulatory uncertainty. In the context of already extended interconnection timelines, further delay would compound financial exposure and deepen the economic risk borne by customer-generators. The practical effect would be to prolong conditions under which projects become increasingly difficult to sustain, with deposits forfeited, development costs unrecoverable, and capital redeployed elsewhere.

Fifth, the Company characterizes MRPL as a “pressing proposal” that warrants prompt adjudication. Yet the urgency cited by the Company does not override the statutory structure under which the issue was filed, nor does it justify fragmenting the proceeding. Moreover, severance

does not guarantee expedited resolution; it merely relocates the issue to a separate docket without the statutory timing protections applicable to base rate proceedings.

Finally, PPL Electric requests an expedited Answer deadline in light of the upcoming hearings. The CGC has responded promptly. However, the compressed timeline arises from the Company's late-stage corrections. Procedural fairness should not be compromised by an expedited schedule necessitated by circumstances within the Company's control.

For these reasons, the CGC respectfully submits that PPL's Motion to Sever the Maximum Registered Peak Load Proposal from the Base Rate Case should be denied.

I. BACKGROUND

1. Paragraphs 1 through 37 of the Motion are admitted.

II. MOTION TO SEVER

38. Denied. The CGC denies that severance of the MRPL proposal is necessary or appropriate. While the CGC agrees that parties must have a full and fair opportunity to litigate the proposal, severance is not required to protect due process. The Commission retains ample authority within this proceeding to address scheduling and evidentiary concerns, including modification of the hearing schedule, limited supplemental discovery, or the submission of responsive testimony, without removing the MRPL proposal from the base rate case. The CGC further denies that transferring the existing record to a separate proceeding adequately addresses the structural, statutory, and economic concerns raised by severance.

39. Admitted in part and denied in part. The CGC admits that PPL Electric Witness Castanaro's corrected and updated analyses were provided to the parties on February 12, 2026, and submitted as part of rejoinder testimony on February 13, 2026. The CGC further admits that parties must be afforded a meaningful opportunity to respond to material revisions. The CGC

denies, however, that severance of the MRPL proposal is required to protect due process. The corrected analyses arise from the Company's own Direct Testimony, and the Commission retains authority within this proceeding to address any resulting scheduling or evidentiary issues without removing the issue from the base rate case.

40. Admitted in part and denied in part. The CGC admits that PPL Electric Witness Castanaro identified errors in certain analyses on or about February 10, 2026. The CGC lacks sufficient information to admit or deny the characterization of those analyses as "key" and therefore denies the same. The CGC further denies any implication that the existence of such errors compels severance of the MRPL proposal from this proceeding.

41. Admitted in part and denied in part. The CGC admits that Mr. Castanaro indicated that PPL Electric Exhibit AC-1 utilized a 0% cancellation rate rather than a 36% cancellation rate. The CGC lacks sufficient information at this time to admit or deny the full scope and quantitative impact of that error on excess generation, Price to Compare ("PTC"), and total net metering compensation as characterized in the Motion and therefore denies the same. The CGC further denies any implication that the correction of this error resolves or materially narrows the substantive disputes surrounding the MRPL proposal.

42. Admitted in part and denied in part. The CGC admits that Mr. Castanaro stated that certain distribution Rate LP-4 no-load customer-generators were not included in prior versions of PPL Electric Exhibits AC-1 through AC-3 and that revised analyses were subsequently provided. The CGC lacks sufficient information at this time to admit or deny the Company's characterization of the scope, magnitude, or impact of that omission, including the asserted effect on kWh generation data, Price to Compare ("PTC"), and total compensation figures, and therefore denies the same. The CGC further denies any implication that the asserted correction resolves or

materially cures the substantive disputes regarding the MRPL proposal or its economic justification.

43. Admitted in part and denied in part. The CGC admits that Mr. Castanaro’s rejoinder testimony (PPL Electric St. No. 15-RJ) reflects revised analyses and numerical changes to certain excess generation, Price to Compare (“PTC”), and net metering compensation figures, and that revised exhibits were submitted as PPL Electric Exhibits AC-1RJ through AC-3RJ. The CGC denies any characterization of those revisions as conclusively establishing “significant impacts” for purposes of this proceeding and lacks sufficient information at this time to admit or deny the accuracy, reliability, or methodological validity of the revised calculations. The CGC further denies any implication that the submission of revised exhibits resolves the substantive disputes concerning the MRPL proposal.

44. Admitted in part and denied in part. The CGC admits that PPL Electric submitted additional analyses as part of Mr. Castanaro’s rejoinder testimony, including revised exhibits identified as PPL Electric Exhibits AC-4RJ through AC-6RJ, and that those analyses incorporated a 17.3% capacity factor referenced in JSA Witness Lucas’s testimony and adjustments to procurement assumptions. The CGC denies any characterization that such revisions fully address or resolve the substantive criticisms raised by other parties. The CGC further lacks sufficient information at this time to admit or deny the accuracy, completeness, or methodological validity of the updated analyses and therefore denies the same.

45. Admitted in part and denied in part. The CGC admits that PPL Electric’s counsel informed certain parties on February 11, 2026 of identified errors and the Company’s intent to provide corrected and updated analyses, that revised analyses were provided via email on February 12, 2026, and that those materials were submitted as part of Mr. Castanaro’s rejoinder testimony

on February 13, 2026. The CGC denies the characterization that the Company's actions were "expeditious" to the extent such term implies that the timing or manner of submission eliminates the procedural consequences of introducing materially revised analyses shortly before the scheduled evidentiary hearings.

46. Admitted in part and denied in part. The CGC admits that evidentiary hearings are scheduled to begin on February 17, 2026. The CGC denies that severance is required based on the current schedule and further denies any implication that the Commission lacks authority within this proceeding to modify the schedule, permit limited supplemental discovery, or otherwise address the corrected analyses without removing the MRPL proposal from the base rate case.

47. Admitted in part and denied in part. The CGC admits that, under the currently established litigation schedule, no additional rounds of written testimony are presently scheduled. The CGC denies any implication that the Commission lacks authority to modify the procedural schedule, permit supplemental testimony, or otherwise provide appropriate relief within this proceeding without severing the MRPL proposal from the base rate case.

48. Admitted. The CGC admits that the Commission, as an administrative body, is bound by constitutional due process and principles of fundamental fairness, as stated in *Hess v. Pa. PUC*, 107 A.3d 246, 266 (Pa. Cmwlth. 2014). The CGC denies, however, any implication that the due process principles articulated in *Hess* mandate severance of the MRPL proposal from this proceeding.

49. Admitted. The CGC admits that due process includes notice and a meaningful opportunity to be heard, including the opportunity to review evidence, cross-examine witnesses, inspect documents, and offer rebuttal evidence, as stated in *Hess v. Pa. PUC*, 107 A.3d 246, 266 (Pa. Cmwlth. 2014). The CGC denies, however, any implication that these due process

requirements necessitate severance of the MRPL proposal, as the Commission retains authority within this proceeding to ensure that such protections are afforded without removing the issue from the base rate case.

50. Admitted in part and denied in part. The CGC admits that parties must be afforded a full and fair opportunity to review and respond to material evidence in order to satisfy due process. The CGC denies, however, that severance of the MRPL proposal is required to provide such opportunity. The Commission retains authority within this proceeding to ensure that parties may review the corrected analyses and present responsive evidence without removing the issue from the base rate case.

51. Denied. The CGC denies that severance of the MRPL proposal is necessary or appropriate to resolve due process concerns. While the CGC agrees that parties must have a meaningful opportunity to conduct discovery and present responsive evidence, the Commission retains broad procedural authority within this base rate proceeding to modify schedules, permit supplemental discovery, authorize additional testimony, or otherwise fashion tailored relief. Severance is a discretionary procedural mechanism, not a due process mandate; and removal of the MRPL proposal from the statutory framework governing this case is neither required nor justified.

52. Denied. The CGC denies that the absence of a direct impact on the Company's aggregate base rate revenue requirement renders the MRPL proposal suitable for separate adjudication. While the MRPL may not alter the total revenue the Company seeks to recover, it directly affects customer classification, cost allocation, and rate design within the default service structure. Such determinations are core ratemaking functions governed by 66 Pa. C.S. §§ 1301 and 1304 and are traditionally examined within the comprehensive framework of a base rate

proceeding conducted pursuant to 66 Pa. C.S. § 1308. The fact that the total revenue requirement may remain unchanged does not remove the proposal from the broader ratemaking structure in which it was introduced. Accordingly, the CGC denies that the MRPL proposal may be severed on this basis.

53. Admitted in part and denied in part. The CGC admits that the parties have engaged in substantial discovery and submitted testimony and exhibits concerning the MRPL proposal. The CGC denies, however, that severance is necessary to preserve that record or that the prospect of transferring testimony and exhibits outweighs the structural and economic concerns associated with removing the issue from this base rate proceeding. The existence of a developed record does not justify disrupting the statutory suspension framework or prolonging regulatory uncertainty affecting customer-generators who have relied upon existing tariffs and regulations in making significant capital commitments.

54. Denied. The CGC denies that severance appropriately balances urgency with due process or that a separate proceeding would ensure a swift resolution of the MRPL proposal. The statutory suspension framework governing this base rate case provides a defined and finite timeline for adjudication. Removing the MRPL proposal from that structure would eliminate the certainty of resolution within the statutory period and instead place the issue on a separate procedural track without comparable statutory time constraints. While the CGC has emphasized the importance of timely resolution due to the significant economic stakes for customer-generators, severance would prolong, rather than alleviate, the regulatory uncertainty currently affecting projects in various stages of development and interconnection. The Commission retains authority within this proceeding to address any procedural concerns without sacrificing the statutory timeline that

ensures finality. Accordingly, the CGC denies that severance strikes the balance the Company suggests.

55. Admitted in part and denied in part. The CGC admits that the Commonwealth Court in *Popowsky v. Pa. PUC*, 13 A.3d 583, 593 (Pa. Cmwlth. 2011), citing *Pennsylvania Industrial Energy Coalition v. Pa. PUC*, 653 A.2d 1336, 1350 (Pa. Cmwlth. 1995), articulated principles concerning single-issue ratemaking and the treatment of Section 1307 surcharges. The CGC denies, however, that those principles render severance appropriate here. The MRPL proposal directly affects customer classification and cost allocation within the default service rate structure; matters traditionally examined in the comprehensive context of a base rate proceeding under 66 Pa. C.S. §§ 1301 and 1304. Moreover, net metering compensation arises from statutory entitlements established under the Alternative Energy Portfolio Standards Act, 73 P.S. §§ 1648.1–1648.8, and implemented through 52 Pa. Code Chapter 75; such credits are not discretionary “surcharges” imposed pursuant to an automatic adjustment clause under Section 1307. Accordingly, the CGC denies that the doctrine of single-issue ratemaking is inapplicable or that severance would be free of structural ratemaking concerns.

56. Denied. The CGC denies that the MRPL proposal does not affect components of the Company’s base rate structure. Although the MRPL may not alter the aggregate revenue requirement, it directly affects customer classification and the allocation of costs within the rate design framework. Classification decisions and inter-class cost impacts are foundational ratemaking elements traditionally evaluated in a comprehensive base rate proceeding pursuant to 66 Pa. C.S. §§ 1301, 1304, and 1308. The CGC further denies that the MRPL proposal “only” affects Section 1307 surcharges. Section 2807(e)(3.9) authorizes recovery of reasonable default service procurement costs through a reconcilable automatic adjustment clause; it does not

authorize redefinition of customer classifications or modification of statutorily mandated net metering credits established under the Alternative Energy Portfolio Standards Act, 73 P.S. §§ 1648.1–1648.8, and implemented in 52 Pa. Code Chapter 75. The Company’s reliance on Section 1307 recovery authority does not transform classification decisions premised on inter-class cost impacts into mere surcharge adjustments. Accordingly, the CGC denies that the doctrine of single-issue ratemaking is inapplicable or that severance is structurally justified on this basis.

57. Admitted in part and denied in part. The CGC admits that certain utilities, including UGI Electric and FirstEnergy Pennsylvania Electric Company, have addressed similar proposals within Default Service Plan proceedings, and that Citizens’ Electric addressed a proposal within a rate case. The CGC denies, however, that the existence of such proceedings establishes that severance is appropriate or that the MRPL proposal may be removed from this base rate case without consequence. The procedural posture adopted in other cases does not alter the statutory structure governing this proceeding. PPL Electric elected to introduce the MRPL proposal as part of its base rate filing under 66 Pa. C.S. § 1308 and supported it with economic modeling premised on existing rate relationships. Having placed the proposal within this comprehensive rate case framework, the Company cannot now rely on procedural flexibility in other dockets to justify removal of the issue from the statutory suspension structure applicable here. Accordingly, the CGC denies that the cited proceedings support severance in this case.

58. Denied. The CGC denies that its position seeks to “punt” the MRPL issue to a future Default Service Plan proceeding or that severance would provide a more expeditious resolution. The CGC’s position is that the MRPL proposal should be adjudicated within the statutory suspension framework governing this base rate case under 66 Pa. C.S. § 1308, which provides a defined and finite timeline for Commission action. Removing the proposal from this proceeding

would eliminate the certainty of resolution within the statutory suspension period established under 66 Pa. C.S. § 1308 and instead place the issue on a separate procedural track without comparable statutory time constraints. The CGC's concern is not delay for its own sake, but the prolonging of regulatory uncertainty that is already materially affecting customer-generators who have relied upon existing tariffs and regulations in making substantial capital commitments. Accordingly, the CGC denies that severance offers a faster or more appropriate path to clarity.

59. Admitted in part and denied in part. The CGC admits that the Commission in *Pa. PUC v. Duquesne Light Co.*, Docket Nos. R-2013-2372129, et al. (Order entered Apr. 23, 2014), severed certain Rider No. 18 issues under the circumstances described in that Order. The CGC denies, however, that the Duquesne Light proceeding supports severance here. The circumstances in Duquesne Light are materially distinguishable. There, the issue arose from a complaint challenging an existing rider; Duquesne itself did not propose changes to Rider No. 18 in conjunction with its base rate increase request. The Commission expressly noted that the deferred issue “d[id] not have any effect on the agreed upon revenue requirement contained within the Settlement.” *Id.* at 30. The matter was collateral to the utility's rate filing and was held in abeyance due to time constraints inherent in the settlement posture of that case. By contrast, PPL Electric affirmatively introduced the MRPL proposal as part of its base rate filing and supported it with economic modeling premised upon inter-class cost impacts and existing rate relationships. The MRPL proposal directly implicates customer classification and cost allocation, both core ratemaking components embedded in the Company's filing, not a collateral complaint concerning an existing rider. Accordingly, the CGC denies that the Duquesne Light precedent compels or meaningfully supports severance under the facts presented here.

60. Denied. The CGC denies that severance of the MRPL proposal is necessary to protect due process or to ensure an orderly, efficient, or sound resolution of the issues presented. While the CGC agrees that parties must be afforded a meaningful opportunity to respond to material revisions, the Commission retains ample procedural authority within this base rate proceeding to address scheduling and evidentiary concerns without removing the MRPL proposal from the statutory suspension framework governing this case. Severance would not enhance efficiency; rather, it would disrupt the defined timeline established under 66 Pa. C.S. § 1308 and prolong the regulatory uncertainty already affecting customer-generators who have relied upon existing tariffs and regulations in making substantial capital commitments. Accordingly, the CGC respectfully requests that the Motion to Sever be denied.

III. NEED FOR EXPIDITED ANSWER DEADLINE

61. Admitted in part and otherwise responded to as follows. The CGC admits that PPL Electric has requested an expedited Answer deadline. The CGC takes no position on the establishment of a specific response deadline beyond preserving its right to a reasonable opportunity to respond consistent with due process and the Commission's procedural rules.

62. Admitted in part and denied in part. The CGC admits that the ALJs' ruling on the Motion may affect the scope of hearings scheduled to begin on February 17, 2026, and that certain scheduled cross-examination relates to the MRPL proposal. The CGC denies any implication that the potential impact on hearing logistics compels severance of the MRPL issue. The Commission retains authority to manage the hearing schedule and scope of testimony within this proceeding without removing the proposal from the base rate case.

63. Admitted in part and denied in part. The CGC admits that correspondence among the parties and the ALJs occurred on February 13 and 14, 2026 concerning the Company's

intention to seek severance. The CGC denies any implication that such correspondence substitutes for the formal requirements of motion practice or alters the parties' entitlement to respond fully and formally to the Motion as filed.

64. Admitted in part and otherwise responded to as follows. The CGC admits that the Company has requested that Answers be due by February 15, 2026. The CGC takes no position on the establishment of a specific deadline beyond preserving its right to a reasonable opportunity to respond consistent with due process and the Commission's procedural rules.

WHEREFORE, for all the reasons set forth above, the Customer-Generator Coalition respectfully requests that Your Honors (i) deny PPL Electric Utilities Corporation's Motion to Sever the Maximum Registered Peak Load proposal from this base rate proceeding; (ii) maintain the MRPL issue within the statutory suspension framework governing this case; (iii) and grant such other relief as may be just and appropriate.

Respectfully submitted,



Daniel A. Garcia (PA Attorney ID
311503)
Brian Pulito (PA Attorney ID 203952)
Sarah M. Rambin (PA Attorney ID
313717)
Steptoe and Johnson, PLLC
1 PPG Place, Suite 3300
Pittsburgh, PA 15222
412-504-8010 (telephone)
412-504-8011 (fax)
Daniel.Garcia@Steptoe-Johnson.com
Brian.Pulito@Steptoe-Johnson.com
Sarah.Rambin@Steptoe-Johnson.com

Date: February 15, 2026

Counsel for Customer-Generator
Coalition

VERIFICATION

I, DANIEL GARCIA, state that I am the Attorney of Record for the Customer-Generator Coalition (“CGC”) and that as much, I am authorized to make this verification on its behalf. I hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: February 15, 2026



Daniel A. Garcia
Counsel for Customer-Generator Coalition