

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17120**

Public Meeting held March 12, 2026

Commissioners Present:

Stephen M. DeFrank, Chairman  
Kimberly Barrow, Vice Chair  
Kathryn L. Zerfuss  
John F. Coleman, Jr.  
Ralph V. Yanora

Petition of PPL Electric Utilities Corporation  
for Approval of its Second Distributed Energy  
Resources Management Plan

P-2024-3049223

**OPINION AND ORDER**

**BY THE COMMISSION:**

Before the Pennsylvania Public Utility Commission (Commission) for consideration and disposition is the Petition for Reconsideration and/or Clarification, filed by the Office of Consumer Advocate (OCA) (hereinafter referred to as OCA Petition), as well as a Petition for Clarification and Stay/Supersedeas filed by the

Joint Solar Parties (JSPs) (hereinafter referred to as JSPs Petition),<sup>1</sup> on December 18, 2025, seeking reconsideration and/or clarification and stay of the Commission's Opinion and Order entered on December 3, 2025 (*December 2025 Order*),<sup>2</sup> relative to the above-captioned proceeding. On December 29, 2025, PPL Electric Utilities Corporation (PPL or the Company) filed an Answer to both Petitions (PPL Answer to Petitions), and on December 30, 2025, the JSPs filed a Reply to PPL's Answer to Petitions (JSPs Reply to Answer). In addition, on January 2, 2026, PPL filed a Motion to Strike the JSPs Reply to Answer (PPL Motion to Strike), and on January 5, 2026, the JSPs filed an Answer to the PPL Motion to Strike (JSPs Answer to Motion to Strike).

In the OCA Petition, the OCA seeks to understand the scope of the Commission's *December 2025 Order*. Specifically, the OCA requests that the Commission reconsider or clarify whether small DER installations under 200 kW are included in the scope of the DER Orchestration Plan required to be filed by PPL, pursuant to the *December 2025 Order*. If the Commission intended to include DERs under 200 kW, the OCA requests reconsideration. OCA Petition at 1-2. In its Answer, PPL contends that no clarification is necessary and that the OCA Petition fails to meet the

---

<sup>1</sup> American Home Contractors, Inc., the Solar Energy Industries Association, SolarEdge Technologies, Inc., Sun Directed, Tesla, Inc., and Trinity Solar, LLC (collectively, the Joint Solar Parties or the JSPs). It should be noted that prior to the filing of the JSPs Petition, the JSPs also included Enphase Energy, Inc. (Enphase). However, Enphase is not listed with the JSPs in their Petition, and the JSPs note that the composition of the JSPs is subject to change. *See* JSPs Petition at 1.

<sup>2</sup> The *December 2025 Order* approved PPL Electric Utilities Corporation's (PPL or the Company) Petition for Approval of its Second Distributed Energy Resources (DER) Management Plan (DER Management Petition), with two modifications: (1) within twelve (12) months of the entry date of the *December 2025 Order*, the Company shall file a DER Orchestration Plan with the Commission and provide an evaluation of three different flexible interconnection approaches; and (2) within twelve (12) months of the entry date of the *December 2025 Order*, PPL shall conduct a Request for Proposal (RFP) from third-party aggregators and original equipment manufacturers. *See December 2025 Order* at 63-64, Ordering Paragraph Nos. 5 and 6.

legal standard for reconsideration or clarification, and therefore, requests that the OCA Petition be denied. PPL Answer to Petitions at 33-35. For the reasons stated more fully, *infra*, we conclude that the OCA has failed to assert a sufficient basis for reconsideration of our *December 2025 Order*. Therefore, based upon the record in this proceeding, and upon consideration of the OCA’s arguments, we shall deny the OCA Petition, consistent with the discussion in this Opinion and Order.

In the JSPs Petition, the JSPs request that we stay the effectiveness of the *December 2025 Order* “pending resolution of any appellate proceedings and any required proceedings on remand,” as well as clarify key aspects of the *December 2025 Order* to prevent what the JSPs argue are unlawful, harmful, and premature program requirements.<sup>3</sup> JSPs Petition at 1, 20-21. In its Answer, PPL urges the Commission to deny the JSPs Petition in its entirety and allow its Second DER Management Plan

---

<sup>3</sup> On January 5, 2026, the JSPs filed a motion, pursuant to 52 Pa. Code §§ 5.91 and 5.103, to amend their existing JSPs Petition to include Enphase as a member of the JSP group (Motion to Amend the JSPs Petition). The Motion to Amend the JSPs Petition explains that the Amended JSPs Petition is “exactly the same” as the version filed on December 18, 2025, except for the following edits: (1) adds the word “Amended” to the JSPs Petition title; (2) removes the prior footnote stating the JSP group’s membership “may change;” (3) adds Enphase in the opening paragraph listing the JSPs; and (4) updates the date on the Amended JSPs Petition to the filing date, January 5, 2026. Motion to Amend the JSPs Petition at 2. No Answers were filed in response to the Motion to Amend the JSPs Petition. The JSPs note that PPL, the OCA, the Office of Small Business Advocate (OSBA), and the Sustainable Energy Fund of Central Eastern Pennsylvania (SEF) have indicated that they do not oppose this Motion to Amend the JSPs Petition. As no Answers opposing the Motion to Amend the JSPs Petition have been filed, we can only conclude from this that none of the entities served with the motion oppose the motion. In addition, it does not appear that the Parties would be prejudiced in any way by the request in the Motion to Amend the JSPs Petition. Therefore, we will grant the Motion to Amend the JSPs Petition. We note that our decision to grant the Motion to Amend the JSPs Petition does not in any way affect the content of the JSPs Petition, other than what is specifically noted above. We further note that Attachment A to the Motion to Amend the JSPs Petition, contains the “(Amended) Petition for Clarification and Stay/Supersedes” filed by the JSPs (Amended JSPs Petition).

(Second DER Management Plan or Plan) to move forward as approved, since, according to PPL, the JSPs Petition fails to meet the legal standards for either stay/supersedeas or clarification. Upon review, we shall deny the Amended JSPs Petition, consistent with this Opinion and Order.

## I. Procedural History<sup>4</sup>

This proceeding concerns PPL's Petition for approval to implement its Second DER Management Plan, following the conclusion of its First DER Management Plan and Pilot Program. *See Petition of PPL Electric Utilities Corporation for Approval of Tariff Modifications and Waivers of Regulations Necessary to Implement its Distributed Energy Resources Management Plan*, Docket No. P-2019-3010128 (Final Order entered December 17, 2020) (*December 2020 Order*).<sup>5</sup>

On May 20, 2024, PPL filed its DER Management Petition requesting the Commission's approval of tariff modifications and other authorizations that are needed to implement PPL's Second DER Management Plan, pursuant to Paragraph 62 of the Joint Petition for Approval of Settlement of All Issues (DER Settlement) approved by the Commission's *December 2020 Order*.

On June 30, 2025, the Commission issued the Recommended Decision (R.D.) of Administrative Law Judge (ALJ) John M. Coogan, wherein he recommended

---

<sup>4</sup> *See December 2025 Order* at 2-7 for a comprehensive summary describing the background and procedural history of this proceeding, which is incorporated herein by reference.

<sup>5</sup> By Commission Opinion and Order entered September 12, 2024, the term of PPL's DER Pilot Program was extended until thirty (30) days after the Final Order is entered in the instant docket. *See Petition of PPL Electric Utilities Corporation for Approval of Tariff Modifications and Waivers of Regulations Necessary to Implement its Distributed Energy Resources Management Plan*, Docket No. P-2019-3010128 (Opinion and Order entered September 12, 2024) (*September 2024 Order*).

that the Commission deny PPL's DER Management Petition, based upon his determination that the Parties opposing PPL's Second DER Management Plan (*i.e.*, the JSPs, the OCA, the OSBA, and SEF) presented evidence of greater weight than PPL. R.D. at 1, 42-46, 49.

PPL and the JSPs filed Exceptions on July 15, 2025. Replies to Exceptions were filed by PPL, the JSPs, the OCA, and the OSBA on July 22, 2025.

In our *December 2025 Order*, we: (1) granted, in part, the Exceptions of PPL; (2) denied the Exceptions of the JSPs; (3) reversed the ALJ's Recommended Decision; and (4) approved PPL's DER Management Petition, as modified by, and consistent with, the *December 2025 Order*.

As noted, *supra*, on December 18, 2025, the OCA filed the OCA Petition, and the JSPs filed the JSPs Petition.<sup>6</sup>

By Opinion and Order entered December 24, 2025, the Commission granted reconsideration of the *December 2025 Order* as to the OCA and the JSPs Petitions pending further review of, and consideration on, the merits, pursuant to Pa. R.A.P. 1701(b)(3) (*Tolling Order*).

On December 26, 2025, PPL filed an Emergency Petition for Clarification of the Commission's *Tolling Order* (Emergency Petition), requesting that the Commission issue an Order clarifying that the *Tolling Order* did not grant any stay or supersedeas of the *December 2025 Order*.

---

<sup>6</sup> As discussed, *supra*, the JSPs filed their Amended JSPs Petition on January 5, 2026.

On December 29, 2025, PPL filed its Answer to Petitions.<sup>7</sup>

Also on December 29, 2025, the JSPs filed an Answer to PPL's Emergency Petition (JSPs Answer to Emergency Petition), arguing that the Commission's *Tolling Order* constituted issuance of a stay which would preclude PPL from installing its devices on January 1, 2026, or to launch its Second DER Management Plan on January 3, 2026 per a tariff supplement it may file on or before January 2, 2026, as provided for in the *December 2025 Order*. JSPs Answer to Emergency Petition at 4. The OCA also filed an Answer to the Emergency Petition on December 29, 2025 (OCA Answer to Emergency Petition), making similar arguments that the *Tolling Order* granted a stay. OCA Answer to Emergency Petition at 4-6.

Consistent with PPL's DER Management Petition, as modified by our *December 2025 Order*, on January 2, 2026, PPL filed its compliance tariff supplement, Supplement No. 411, to become effective on one day's notice. On January 5, 2026, the JSPs filed a Motion to Strike the Company's compliance tariff supplement (JSPs Motion to Strike), and on January 9, 2026, PPL filed its Answer to the JSPs Motion to Strike (PPL Answer to Motion to Strike).

By Secretarial Letter issued on January 12, 2026 (*January 2026 Secretarial Letter*), the Commission granted PPL's Emergency Petition, stating the following:

Because the [*Tolling Order*] expressly granted reconsideration to retain jurisdiction *pending disposition of the merits of both the reconsideration and clarification/supersedeas petitions*, to the extent that Solar Parties and the OCA construed this language to be a grant of stay/supersedeas due to the wording of the ordering

---

<sup>7</sup> As noted, *supra*, on December 30, 2025, the JSPs filed the JSPs Reply to Answer. On January 2, 2026, PPL filed the PPL Motion to Strike, and on January 5, 2026, the JSPs filed the JSPs Answer to Motion to Strike.

paragraphs, we clarify that no grant or denial of supersedeas has occurred *pending review on the merits of the petition*. Since the Commission has not acted on the merits of either of the petitions, as a matter of law, no stay or supersedeas has been granted.

*January 2026 Secretarial Letter* at 1 (citing *Tolling Order* at 2). Additionally, the *January 2026 Secretarial Letter* noted that, “because we have clarified that no stay of the proceeding has been ordered,” the JSPs Motion to Strike, filed on January 5, 2026, is denied. *See January 2026 Secretarial Letter* at 2.

## **II. Discussion**

### **A. Legal Standards**

#### **1. Petitions for Reconsideration and Clarification**

With respect to petitions for rehearing, reconsideration, rescission, and amendment of Commission orders, the Public Utility Code (Code) establishes a party’s right to seek relief within fifteen days following the service of a Commission order pursuant to Subsection 703(f). 66 Pa.C.S. § 703(f) (relating to rehearing).<sup>8</sup> Upon the filing of a petition for relief pursuant to Section 703(f), the Commission may affirm, rescind, or modify its original order. 66 Pa.C.S. § 703(f). The Code further provides that the Commission may, at any time, after notice and opportunity to be heard by all affected parties, rescind or amend any order made by the Commission, pursuant to Section 703(g). 66 Pa.C.S. § 703(g) (relating to rescission and amendment of orders). A request for relief pursuant to § 703(f) or § 703(g) must be brought as a petition for relief consistent with

---

<sup>8</sup> Petitions under this section which do not allege new evidence are typically treated as petitions for reconsideration. Petitions for rehearing pursuant to Section 703(f) of the Code typically include an allegation of new evidence. 66 Pa.C.S. § 703(f); *see West Penn Power Co. v. Pa. PUC*, 659 A. 2d 1055 (Pa. Cmwlth. 1995).

Section 5.572 of the Commission's Regulations. 52 Pa. Code § 5.572 (relating to petitions for relief).

Petitions for relief predicated upon Sections 703(f) and 703(g) of the Code, whether brought under Section 5.572(c) of the Commission's Regulations as a petition for reconsideration, rehearing, reargument, clarification, supersedeas, or others within fifteen days of the service of a Commission order, or under Section 5.572(d) as a petition for rescission or amendment filed at any time following service of a Commission order, are reviewed by the Commission as matters seeking relief falling within the agency's discretion.

The Commission's application of the standard for granting a petition for amendment, reconsideration, clarification, or rescission is set forth in *Philip Duick, et al. v. Pennsylvania Gas and Water Company*, 56 Pa. P.U.C. 553 (1982) (*Duick*) as follows:

A petition for reconsideration, under the provisions of 66 Pa.C.S. § 703(g), may properly raise any matters designed to convince the Commission that it should exercise its discretion under this code section to rescind or amend a prior order in whole or in part on the grounds that the decision or ruling of the Commission on a matter or issue was either unwise or in error.

In this regard we agree with the Court in the *Pennsylvania Railroad Company* case, wherein the Court said,

[b]ut the grounds for reconsideration should be restricted to the new matters and new or changed conditions set up in the joint petition, which had arisen since and were not presented in the several petitions of these appellants ... and dismissed by the Commission ... and not appealed from. Parties, ..., cannot be permitted, by a second motion to review and reconsider, to raise the same questions which were

specifically considered and decided against them and not appealed from. ...

*Pennsylvania Railroad Co. v. Public Service Commission*, [179 A. 850, 854 (Pa. Super. 1935)].

What we expect to see raised in such petitions are new and novel arguments, not previously heard, or considerations which appear to have been overlooked or not addressed by the Commission. Absent such matters being presented, we consider it unlikely that a party will succeed in persuading us that our initial decision on a matter or issue was either unwise or in error.

*Duick* at 559; see also *AT&T v. Pa. PUC*, 568 A.2d 1362 (Pa. Cmwlth. 1990).

The Commission utilizes a two-step analysis in determining whether to exercise its discretion to grant relief under *Duick*. See, e.g., *SBG Management Services, Inc./Colonial Garden Realty Co., L.P. v. Philadelphia Gas Works*, Docket Nos. C-2012-2304183 and C-2012-2304324 (Opinion and Order entered May 9, 2019)<sup>9</sup> at 4-5 (discussing *Application of La Mexicana Express Service, LLC, to transport persons in paratransit service, between points within Berks County*, Docket No. A-2012-2329717; A-6415209 (Opinion and Order entered September 11, 2014)). The first step is to determine whether a party has offered any basis to persuade the Commission to exercise its discretion, including but not limited to, new and novel arguments or identified considerations that appear to have been overlooked or not addressed by the Commission in its previous order. This initial step examines whether a party raises the same questions which were specifically considered and decided against them by a prior Order of the Commission. If so, it is unlikely that the Commission will be persuaded to exercise its discretion to grant relief. *Duick* at 559 (citing *Pennsylvania Railroad Co. v. Public Service Commission*, 179 A. 850 (Pa. Super. 1935)). The second step of the *Duick*

---

<sup>9</sup> *Affirmed, Phila. Gas Works v. Pa. PUC*, 249 A.3d 963 (Pa. 2021), *remand granted, in part*, 256 A.3d 1092 (Pa. 2021) (Table).

analysis is to evaluate any matter the Commission has deemed worthy of consideration, to determine whether to grant any relief.

## **2. Petitions for Stay/Supersedeas**

We have adopted the standards set forth in *Pa. PUC v. Process Gas Consumers Group*, 467 A.2d 805 (1983) (*Process Gas*), in reviewing petitions which seek to stay the effect of our Orders. The standards set forth in *Process Gas* require a petitioner to establish the following:

1. Make a strong showing that it is likely to prevail on the merits;
2. Show that without the requested relief, it will suffer irreparable injury;
3. Show that the issuance of a stay will not substantially harm other interested parties in the proceedings; and
4. Show that the issuance of a stay will not adversely affect the public interest.

*Process Gas*, 467 A.2d at 808-09 (citing *Virginia Petroleum Jobbers Association v. Federal Power Commission*, 259 F.2d 921 (D.C. Cir. 1958) (*Virginia Jobbers*)). These criteria require the balancing of all interests, including the public, where applicable. *Id.* at 809.

In *Process Gas*, the Supreme Court also acknowledged that a request for a stay pending appeal usually involves review of the merits of a dispute that have already been fully considered in an adversarial proceeding before the same body now considering the request for a stay. In this instance, the Court concluded that it is essential that the petitioner make a strong case under the criteria. *Process Gas*, 467 A.2d at 809. The Court went on to state that when facing a case in which the other three factors strongly favor interim relief, discretion may be exercised to grant a stay where the petitioner has

made a substantial case on the merits. *Id.* (quoting *Washington Metropolitan Area Transit Commission v. Holiday Tours, Inc.*, 559 F.2d 841, 843 (D.C. Cir. 1977)).

Lastly, we note that any issue not specifically addressed herein has been duly considered and will be denied without further discussion. It is well settled that we are not required to consider expressly or at length each contention or argument raised by the parties. *Consolidated Rail Corporation v. Pa. PUC*, 625 A.2d 741 (Pa. Cmwlth. 1993); *see also, generally, University of Pennsylvania v. Pa. PUC*, 485 A.2d 1217 (Pa. Cmwlth. 1984).

## **B. *December 2025 Order***

In the *December 2025 Order*, we described the background of the issue, explaining how the dispute over PPL's Second DER Management Plan grew out of PPL's previous, Commission-approved First DER Management Plan and Pilot Program, which began when PPL filed its initial DER Management Petition in May 2019 at Docket No. P-2019-3010128. We noted that in December 2020, the Commission approved the DER Settlement and authorized PPL to implement its First DER Management Plan, including tariff changes and regulatory waivers needed to operate the program. We then described how the current case arose when PPL later filed the instant DER Management Petition seeking approval to move beyond the Pilot Program and implement a second-phase, broader plan, arguing that the Pilot Program showed benefits and that the expanded Plan was justified.

Regarding the positions of the Parties, PPL asserted that its Second DER Management Plan is necessary to ensure safe, reliable, and resilient electric service as DER penetration grows. PPL argued that its Plan will reduce interconnection costs, increase hosting capacity, improve system visibility, mitigate voltage issues, and provide net benefits to customers through avoided infrastructure and operational savings. In

support of the cost-effectiveness of its Plan, PPL relied on its consultant-supported cost-benefit analysis and projected aggregate net benefits of approximately \$65 million, while also claiming that even without benefits, the bill impact on its ratepayers would not be significant. *December 2025 Order* at 12-16.

The JSPs opposed approval of PPL's Plan, arguing that it is unlawful, overly burdensome, and exceeds state and national standards. The JSPs contended that PPL's requirements increase costs, restrict market entry, interfere with inverter performance and communications, and improperly create a utility monopoly over DER grid services without compensation to customers. The JSPs also contended that PPL's proposal was premature, not reasonably priced, based on a flawed cost-benefit analysis, and would cause harm by increasing project costs, disrupting communications/power generation, blocking market entry, and restricting third-party aggregation. *December 2025 Order* at 16-21.

The OCA argued that the Plan should be rejected as unprecedented and not cost-effective, emphasizing that other jurisdictions (*e.g.*, San Diego and Hawaii) manage high DER penetration without mandatory utility-owned control devices. Alternatively, the OCA proposed requiring PPL to file a comprehensive DER Orchestration Plan analyzing cost-effective alternatives and appropriate thresholds for control. *December 2025 Order* at 21-24.

The OSBA contended that PPL failed to prove the Pilot Program was sufficiently successful or cost-effective, and that PPL's rebuttal cost-benefit analysis was flawed. Therefore, the OSBA requested that PPL's Plan be denied without prejudice, an extension of the Pilot Program, and PPL be ordered to provide a more complete cost-benefit analysis before any permanent program approval. *December 2025 Order* at 24-25.

SEF opposed approval of the Plan as premature and not in the public interest, raising concerns about cybersecurity, rate impacts, and risks to customers who rely on DER systems for critical needs. SEF also contended that PPL's claimed benefits can be achieved through autonomous inverter functions, and requested either the outright denial of PPL's Plan or, in the alternative, a limitation to autonomous controls/voluntary participation (or a broader statewide regulatory proceeding). *December 2025 Order* at 25-26.

Our discussion of the ALJ's Recommended Decision was summarized, as follows:

ALJ Coogan recommended that the Commission deny PPL's Petition because of the Company's "failure to meet its burden of proof in this proceeding." R.D. at 1, 42-46. Specifically, the ALJ concluded that PPL failed to carry its burden of proof in demonstrating: (1) why the scope of its proposed active monitoring and control of DER devices for all customer-owned and third-party-owned inverter-based DER installations is reasonable or necessary; (2) how the proposed standards of PPL's proposal will result in harms to participants in the DER program; and (3) that its proposal is supported by a reliable and positive cost-benefit analyses. *See* R.D. at 42, 43, 44, 46. According to the ALJ, the other Parties' evidence outweighed PPL's evidence regarding: (1) the scope of the Plan; (2) the impact of the Plan's requirements; and (3) the Company's cost-benefit analyses. *See* R.D. at 42-46. Therefore, based on review of the record evidence established in this proceeding, and the particular circumstances identified in this proceeding, ALJ Coogan recommended that the Commission deny the Company's Petition. R.D. at 42, 46, 49.

*December 2025 Order* at 27.

PPL filed four Exceptions to the Recommended Decision, arguing that the ALJ erroneously recommended that the Commission deny PPL's DER Management

Petition. Rather, PPL contended, its Second DER Management Plan should be approved because it is reasonable and necessary, does not cause credible harms, and is supported by a reliable cost-benefit analysis. Specifically, in its Exceptions, PPL asserted that the ALJ erred in finding the following: (1) that PPL had not demonstrated why the Plan’s scope is reasonable or necessary, emphasizing that active management is needed to address safety, reliability, voltage violations, load masking, anti-islanding risks, and resource adequacy concerns; (2) “credible harms” to JSPs (such as lost sales and interconnection delays), contending PPL rebutted those claims with record evidence and disputing that its Plan blocks third-party aggregation, stating that the Company was willing to pursue a Request for Proposal (RFP) process for third-party aggregators/ original equipment manufacturers; (3) that PPL’s cost-benefit analyses do not support the Plan and maintained it demonstrated benefits exceeding costs; and (4) as an alternative to outright denial, PPL requested reasonable modifications (including adoption of an OCA-supported approach requiring a DER Orchestration Plan and evaluation of flexible interconnection approaches). *See December 2025 Order* at 31-48.

The JSPs filed Exceptions seeking further relief beyond what the ALJ recommended, including repeating their request that the Commission order PPL to replace SolarEdge inverters affected by the DER Management Device installation, or pay into a fund for replacements.<sup>10</sup> *December 2025 Order* at 49-54.

Through our *December 2025 Order*, we reversed the ALJ’s Recommended Decision and approved PPL’s Second DER Management Plan, concluding that PPL met its burden of proof to justify continuing and expanding active DER monitoring and

---

<sup>10</sup> In our *December 2025 Order*, we found that this request was not properly raised through the evidentiary record (*i.e.* was only raised in Briefs/Exceptions) and could not be considered without violating due process. We further held that the Commission lacked authority to award monetary damages, meaning the JSPs’ damages request could not be granted in this proceeding. *December 2025 Order* at 60-61.

management as a reasonable utility service under its statutory obligations.

*December 2025 Order* at 1, 55-60. The Commission granted PPL's Exceptions, in part, denied the JSPs Exceptions, and determined that PPL's Plan, grounded in the results of PPL's DER Pilot Program, will provide operational benefits such as improved voltage management and increased hosting capacity. Concurrently, we modified approval of the Plan by directing PPL to take additional steps to increase transparency and evaluate alternatives, stating that: (1) within twelve months, PPL must file a DER Orchestration Plan that includes an evaluation of three flexible interconnection approaches; and (2) PPL must also conduct an RFP seeking input from third-party aggregators and original equipment manufacturers. The docket was kept open, pending PPL's compliance with these directives, reflecting the Commission's intent to allow the active DER Plan to move forward while also requiring further planning and competitive/alternative market evaluation. *December 2025 Order* at 63-64.

## **C. OCA Petition, PPL Answer and Disposition**

### **1. OCA Petition and PPL Answer**

In its Petition, the OCA requests that the Commission revisit or clarify aspects of the *December 2025 Order* approving PPL's Second DER Management Plan, as modified. Specifically, the OCA explains that it previously proposed two interrelated limitations: (1) that PPL be required to complete a DER Orchestration Plan; and (2) that small DER installations below 200 kW be excluded from mandatory active DER management. The OCA notes that while the Commission adopted the Orchestration Plan requirement in Ordering Paragraph No. 5 of its *December 2025 Order*, it did not address the OCA's proposal to exempt DERs under 200 kW, leaving uncertainty as to the intended scope of the program and the resulting Orchestration Plan obligations. OCA Petition at 1, 4-5.

Because the OCA believes these issues are “interrelated,” it argues that clarity is necessary since the size of the DER installations included will directly affect the overall scope, complexity, and cost-effectiveness evaluation required in the DER Orchestration Plan. The OCA, therefore, asks the Commission to either reconsider any implicit decision to include installations smaller than 200 kW, since the OCA maintains those smaller projects are not necessary or cost-effective for mandatory active monitoring, or, if the Commission actually intended to adopt the OCA’s full recommendation, to clarify the *December 2025 Order* and Ordering Paragraphs to explicitly confirm that DERs under 200 kW are excluded. In support of this request, the OCA points to its position that most DERs in PPL’s territory are small (with the majority under 25 kW), and that active mandatory monitoring is needed only for larger DERs (200 kW and above) because they can represent a significant fraction of circuit demand and pose a more acute reliability and safety concern, whereas smaller DERs should instead be addressed through more cost-effective methods and optional participation. OCA Petition at 6-8.

In its Answer to the OCA Petition, PPL requests that we deny the OCA Petition, reasoning that the OCA raised no new or novel arguments and did not present any considerations which were overlooked or not addressed previously. Rather, PPL argues that the OCA Petition is merely a recitation of prior positions which were dismissed by the Commission as unpersuasive. PPL Answer to Petitions at 34. Specifically, PPL states that “[t]he Commission reviewed and discussed the OCA’s arguments related to the cost-effectiveness of monitoring small versus large DER installations, including the OCA’s recommendation to ‘require PPL to submit a revised plan distinguishing small and large DER installations and presenting different solutions with supporting assessments and cost-benefit analysis for the Parties to review on a formal record.’” *Id.* (citing *December 2025 Order* at 36).

Further, PPL explains that in the *December 2025 Order*, the Commission already approved PPL's Second DER Management Plan with only two modifications, described *supra*; therefore, PPL characterizes the OCA's request as an attempt to re-litigate issues the Commission has already resolved. According to PPL, the Commission has already addressed and rejected the OCA's 200 kW cutoff argument in the *December 2025 Order*, meaning that the OCA cannot use the reconsideration process to secure a "second opportunity" to argue matters that have already been considered and decided. PPL therefore asks the Commission to deny the OCA Petition in full, maintaining the *December 2025 Order* was properly issued after extensive litigation and that the reconsideration process should not be used to reopen arguments that were previously presented and resolved. PPL Answer to Petitions at 33-35.

## **2. Disposition of the OCA Petition**

As previously noted, Petitions for Reconsideration and Clarification are governed by the standards of *Duick*, under which the Commission applies a two-step analysis. First, we determine whether a party has offered new and novel arguments or identified considerations that appear to have been overlooked or not addressed by the Commission in its previous Order. We will not reconsider our previous decision based on arguments that have already been considered. The second step of the *Duick* analysis, therefore, is to evaluate the new or novel argument, or overlooked consideration, to determine whether to exercise our discretion to modify our previous decision.

Upon consideration of the OCA Petition and the record evidence in this proceeding, we will deny the OCA Petition on the grounds that it fails to persuade us that reconsideration and/or clarification is warranted. Under *Duick*, the OCA Petition may not be used simply to reassert arguments already presented in the underlying proceeding or to obtain a second opportunity to relitigate issues that were considered and resolved in the Commission's *December 2025 Order*.

Here, the OCA, in its Petition, does not introduce any new evidence, newly discovered facts, intervening legal authority, or previously unavailable considerations. Instead, the OCA simply repeats the same underlying substantive position the OCA advanced earlier in the case, that the Second DER Management Plan should exclude or exempt DER installations below 200 kW, and that mandatory active management is not cost-effective or necessary for those smaller installations. Although the OCA attempts to cast its filing as a request for “clarification” regarding the scope of the Commission’s directives, especially as they relate to the Orchestration Plan, the Petition ultimately functions as a renewed attempt to persuade the Commission to adopt the OCA’s preferred policy outcome regarding DER size thresholds. Under *Duick*, such an approach is insufficient because it does not identify a Commission oversight warranting reconsideration, but instead seeks a different result based on arguments already fully litigated.

Additionally, the OCA Petition fails to establish that the Commission “overlooked” or “did not address” the issue in a manner contemplated by *Duick*. The OCA acknowledges that the Commission explicitly adopted the OCA’s proposal requiring PPL to develop an Orchestration Plan and evaluate flexible interconnection approaches, but asserts the Commission “did not address” whether small DER installations below 200 kW were excluded. However, *Duick* does not require the Commission to issue additional clarification merely because a Party believes the *December 2025 Order* should have been more explicit, particularly where the OCA Petition does not identify a genuine ambiguity that prevents implementation or compliance. The OCA Petition does not demonstrate that the *December 2025 Order* is incapable of being implemented as written; rather, it reflects disagreement with the Commission’s determination to approve the Second DER Management Plan with modifications while requiring additional planning and evaluation in the future.

Further, to the extent the OCA seeks reconsideration of the Commission’s decision to include smaller DERs, that request directly conflicts with *Duick*’s prohibition against using reconsideration petitions to raise arguments that were “specifically considered and decided against.” The OCA’s filings in the underlying litigation made clear its view that small DERs should not be subject to mandatory active monitoring and control, and the Commission nevertheless approved PPL’s Plan subject to limited modifications. The OCA Petition, therefore, does not fall within *Duick*’s narrow purpose of addressing overlooked matters; it instead attempts to reopen the merits of the Commission’s decision by reasserting cost-effectiveness and necessity arguments the Commission had already weighed as part of its final determination.

Finally, the OCA Petition cannot satisfy *Duick* merely by asserting that the DER Orchestration Plan scope and the inclusion of small DERs are “interrelated.” That assertion does not amount to a new or overlooked legal or factual issue. Rather, it is a restatement of the OCA’s original policy critique that PPL should distinguish between DER sizes and should not require mandatory active management for smaller installations. This position was fully available to the OCA throughout the evidentiary proceeding, and the OCA, through its Petition, does not identify any newly emerging operational consequence, changed circumstance, or unanticipated implementation barrier that would justify reconsideration or clarification of the *December 2025 Order*.

Therefore, finding no new or novel arguments or any considerations apparently overlooked by the Commission, we decline to exercise our discretion to reconsider the *December 2025 Order* based on the arguments contained in the OCA Petition.

## D. JSPs Petition, PPL Answer and Disposition

### 1. JSPs Petition and PPL Answer

In its Petition, the JSPs request that the Commission pause the effectiveness of its *December 2025 Order* while the JSPs pursue their appeal in the Commonwealth Court of Pennsylvania (Commonwealth Court). As part of the requested stay, the JSPs seek an order barring PPL from conditioning DER interconnection on PPL testing to confirm that customer- or third party-owned inverters are compatible with PPL-owned DER Management Devices that PPL installs and uses to actively manage and monitor DERs.

In support of a stay, the JSPs rely on Pennsylvania stay standards (including *Process Gas*<sup>11</sup> and Commission precedent such as *Pa. PUC v. Makovsky Brothers, Inc.*, 53 Pa. P.U.C. 510 (1979) (*Makovsky*)) and contend that they are likely to

---

<sup>11</sup> Pursuant to the standards of *Process Gas*, for issuance of a stay and/or supersedeas, a petitioner must establish the following:

1. Make a strong showing of likelihood to prevail on the merits;
2. Show that denial of relief will cause irreparable injury;
3. Show that the issuance of a stay will not substantially harm other interested parties in the proceedings; and
4. Show that the issuance of a stay will not adversely affect the public interest.

*Process Gas*, 467 A.2d at 808-09. The Supreme Court further clarified in *Process Gas*: “[I]t is essential that the unsuccessful party, who seeks a stay of a final order pending appellate review, make a strong showing under the[se] criteria in order to justify the issuance of a stay.” *Id.*

prevail, or at least present substantial legal issues, because the Commission’s approval of the Second DER Management Plan allegedly lacks the evidentiary and legal foundation required for a “reasoned decision,” fails to properly address the credible harms found by the ALJ, and rests on flawed cost-benefit support and procedural irregularities. The JSPs insist that preserving the status quo is appropriate because, as they understand current conditions, PPL has reached its annual cap and has not been installing new DER Management Devices, and therefore a stay would avoid immediate market disruption while the appeal proceeds. They argue that denying a stay will cause ongoing and irreparable injury to solar businesses and customers through continued interconnection barriers and program-driven burdens, including increased costs, delays, customer dissatisfaction, reputational damage, interference with communications and power generation, blocked competition from third-party providers, and risks stemming from how DER Management Devices are installed in inverters. The JSPs also argue that PPL will not be substantially harmed if implementation is stayed, asserting that PPL can continue operating safely using the same grid-management tools it has historically relied on and still uses, even without full active control over all DERs, including because many inverters will not have DER Management Devices installed for years. JSPs Petition at 7-20.

In addition to a stay, the JSPs request clarification of three components of the Commission’s *December 2025 Order*. First, the JSPs ask the Commission to clarify that the DER Orchestration Plan and third-party aggregation RFP requirements must be completed in a meaningful way before PPL proceeds further, and they specifically request that PPL be allowed to submit a revised Second DER Management Plan petition only after those filings and evaluations are completed. Second, the JSPs request that the Commission revise the *December 2025 Order* to make clear that if the Pilot Program terminates and a new Program is not ordered, then PPL would no longer be authorized to conduct inverter testing or condition interconnection on such testing. Finally, the JSPs seek clarification that if PPL’s DER Management Petition is ultimately denied, PPL may

not continue limiting equipment choices and installations to only those meeting PPL's bespoke program requirements, and they ask the Commission to confirm the sequencing and obligations surrounding the DER Orchestration Plan and aggregation RFP. JSPs Petition at 20-21.

In its Answer to the JSPs Petition, PPL argues that the Commission should deny the JSPs Petition, reasoning that the JSPs fail to satisfy the governing legal standards and are effectively trying to delay or undermine implementation of the Commission's *December 2025 Order*, approving PPL's Second DER Management Plan (with minor modifications). PPL states that the JSPs bear the burden under the *Process Gas* factors to justify a stay, showing a strong likelihood of success (or at least a substantial case), irreparable harm, lack of substantial harm to others, and no adverse impact on the public interest, and contends the JSPs cannot meet those requirements. PPL further maintains that the JSPs mischaracterize what staying the "status quo" would mean, because their requested relief would not merely pause the *December 2025 Order*, but would effectively halt the existing Pilot Program, even though the Pilot remains ongoing and the annual cap on device installations was set to reset on January 1, 2026. PPL emphasizes that, even if a stay of the *December 2025 Order* were granted, the Pilot Program was previously extended and would continue during the pendency of a stay, because the *December 2025 Order* would not become final until the JSPs and OCA Petitions are resolved, meaning the JSPs' effort to use a stay as a mechanism to stop device installation and inverter compatibility testing improperly conflicts with the *September 2024 Order*. PPL Answer to Petitions at 1-2, 7-8, 27.

PPL also criticizes the legal and factual foundations of the JSPs' stay request. In this regard, PPL asserts the JSPs rely on misstatements of applicable law and overlook that the Commission is the ultimate fact finder with *de novo* review authority. In addition, PPL argues the JSPs have not demonstrated irreparable injury. In contrast, PPL contends that the Company, its customers, and the public would be harmed by a stay

because it would prevent implementation of a Plan that the Commission found would deliver significant net benefits, including materially reducing voltage violations and allowing interconnection of more and larger DERs with fewer distribution upgrades, thereby undermining reliability and efficiency objectives. PPL Answer to Petitions at 16-18, 21-26.

PPL also urges denial of the JSPs' requests for clarification under the *Duick* standard, arguing that the JSPs are improperly re-raising issues already considered and rejected in the *December 2025 Order* (including safety-based allegations) and are also attempting to inject waived arguments for the first time on reconsideration/clarification, such as new challenges relating to the RFP and DER Orchestration Plan provisions that were incorporated into the *December 2025 Order*. PPL Answer to Petitions at 28-33.

**a. JSPs Reply to Answer and PPL Motion to Strike**

By way of an additional pleading, and as previously noted, on December 30, 2025, the JSPs filed a Reply to PPL's Answer to Petitions. In the JSPs Reply to Answer, the JSPs argue that PPL's Answer to Petitions contains a request for affirmative relief, which exceeds the Commission's Regulations at 52 Pa. Code § 5.61, thus triggering the JSPs' right to file a Reply under Section 5.63 of the Commission's Regulations. The JSPs also contend that a Reply is proper because PPL's Answer to Petitions raises new legal arguments not included in the Company's Briefs or Exceptions and "inaccurately construes arguments by the JSPs as new." JSPs Reply to Answer at 1-2. Specifically, the JSPs contend that PPL is asking the Commission to undo or weaken the Commission's December 24, 2025 stay by resetting PPL's annual cap of 3,000 DER Management Devices on January 1, 2026 and allowing PPL to move forward with launching its Second DER Management Plan, despite the stay being in effect. *Id.* at 1.

The JSPs further assert that PPL wrongly reframes what it means to preserve the “status quo,” emphasizing that the Commission has already frozen implementation of the *December 2025 Order* “pending further review,” and that at the time the stay was granted, PPL had already stopped installing new DER Management Devices because it hit its annual cap in November 2025. Therefore, according to the JSPs, the true status quo is that PPL is not authorized to launch its “cap-less” Second DER Management Plan and, under the Pilot, no new Device installations were occurring. The JSPs also argue PPL improperly raises new legal arguments for the first time in its Answer to Petitions, including the claim that most alleged harms are purely financial and therefore insufficient to establish irreparable harm, and the JSPs contend this argument should be disregarded as newly raised and, in any event, ignores both the Commission’s qualified language and the need for a more thorough harm analysis. The JSPs further maintain that the record supports more than mere economic injury, pointing to harms that are speculative or non-compensable and emphasizing impacts on customers’ ability to choose compliant products that meet state standards but cannot satisfy PPL’s unique testing requirements, which the ALJ credited in findings of fact. Finally, the JSPs reject PPL’s assertion that the JSPs waived arguments about improper amendments to Pennsylvania interconnection standards without notice-and-comment rulemaking, stating they raised those issues throughout the case and that the ALJ agreed that utility-specific interpretations warrant statewide proceedings; the JSPs conclude that the Commission should not undo the stay or other relief granted in the *Tolling Order*. JSPs Reply to Answer at 2-4.

In its Motion to Strike the JSPs’ Reply to the Company’s Answer, PPL argues that the JSPs Reply to Answer is an improper pleading and not authorized by the Commission’s Regulations. PPL Motion to Strike at 1. Therefore, PPL requests that the Commission strike the JSPs Reply to Answer and disregard the pleading when ruling on the JSPs Petition. PPL Motion to Strike at 8-9. PPL argues that Commission Regulations only permit a reply to an answer in two narrow circumstances: when the

answer includes a New Matter or seeks affirmative relief. PPL contends that neither situation exists here because the Company, in its Answer to Petitions, merely requests that the Commission deny the JSPs Petition and provides legal arguments in opposition, rather than requesting affirmative relief. PPL Motion to Strike at 2, 5-7.

PPL further argues that Commission precedent supports striking the JSPs Reply to Answer, relying on the Commission's decision in *Petition of Duquesne Light Company*, 72 Pa. P.U.C. 131 (Opinion and Order entered February 6, 1990) (*Duquesne*), where a reply was stricken because the opposing answer did not seek affirmative relief merely by asking that the petition be rejected. PPL Motion to Strike at 2, 6-7 (citing *Duquesne* at 134).

PPL also maintains that the JSPs' claim that PPL raised "new" arguments in its Answer to Petitions (including arguments about *Process Gas* standards and waiver of a statewide rulemaking claim) is unfounded because those arguments were responsive to issues the JSPs allegedly raised for the first time in the JSPs Petition, meaning PPL could not have presented them earlier. Finally, PPL argues that even if the Commission viewed any portion of PPL's Answer to Petitions as improper, the JSPs' remedy would have been to file a motion to strike, not an unauthorized reply. PPL therefore requests that the Commission strike the JSPs Reply to Answer and disregard it when ruling on the JSPs Petition. PPL Motion to Strike at 8.

In their Answer to PPL's Motion to Strike, the JSPs argue that the Commission should deny PPL's request to strike the JSPs Reply to Answer because the Reply was procedurally proper under the Commission's Regulations. The JSPs explain that Commission Regulations allow a reply when an opposing answer contains new matter or seeks affirmative relief, and they contend that PPL's Answer to Petitions did both, particularly by asking the Commission to permit PPL to launch its Second DER Management Plan despite the Commission's stay and by urging a new interpretation of

Paragraph No. 62 of the DER Settlement to find that the DER Pilot's annual device-installation cap resets each year the Pilot continues. JSPs Answer to Motion to Strike at 2-3.

The JSPs also stress their position that the JSPs Reply to Answer was justified because PPL raised new legal arguments for the first time in its Answer to Petitions, including claims that the JSPs' alleged harms are primarily financial and that utility-by-utility deviations from notice and comment proceedings are commonplace, arguments the JSPs say were not presented in PPL's Briefs or Exceptions and are therefore waived, making a reply appropriate to address them. Finally, the JSPs maintain that because their Reply was limited to responding to PPL's new matter and affirmative relief requests, the Commission should deny the PPL Motion to Strike, disregard PPL's procedural attack, and consider the JSPs Reply to Answer when resolving the pending stay/clarification issues. JSPs Answer to Motion to Strike at 3.

**b. Disposition of PPL Motion to Strike**

As a matter within our discretion, based strictly upon the facts of this case, we shall grant PPL's Motion to Strike. We agree with PPL that the JSPs Reply to Answer was not permitted under Commission Regulations, and the circumstances of this case. In addition, we agree with PPL that its Answer to the Petitions does not seek affirmative relief or raise new legal arguments.

At the outset, we note that the *January 2026 Secretarial Letter* expressly clarified that the Commission's *Tolling Order* did not grant a stay or supersedeas of the *December 2025 Order*. The *January 2026 Secretarial Letter* explained that the *Tolling Order* merely retained jurisdiction pending disposition of the merits of the pending Petitions and that, as a matter of law, no stay or supersedeas had been granted because the Commission had not yet acted on the merits. *See January 2026*

*Secretarial Letter* at 2. This clarification confirms that the JSPs Reply to Answer and Answer to PPL's Motion to Strike, premised in significant part on the assertion that a stay was already in effect, rests on a misinterpretation of the Commission's Order and improperly seeks to inject arguments inconsistent with the Commission's clarified procedural posture. See JSPs Answer to Motion to Strike at 2-3 (citing PPL Answer to Petitions at ¶ 24) (wherein the JSPs aver that "given the present state of affairs in this post-Final Order world -- in which PPL is asking either for affirmative relief (that it be permitted to launch its Second DER Management Program despite the Commission's stay of its December 3rd Order authorizing the program...)"). In its Answer to the Petitions, PPL submits that the Commission should deny the JSPs' request for a stay of the Plan's implementation pending appeal. PPL Answer to Petitions at 28. Such a request does not amount to affirmative relief.

Similarly, the argument provided by PPL in its Answer to the Petitions, that most of the JSPs' alleged harms are financial in nature, directly responds to the allegations raised by the JSPs regarding the irreparable harm that the JSPs alleged they will suffer should their request for a stay be denied. Therefore, PPL was not bound to plead material facts as a new matter.

As such, the PPL Answer to Petitions did not seek affirmative relief or plead new matter, but instead properly responded to the JSPs Petition by requesting denial of that Petition and addressing the legal and factual grounds raised therein. Consequently, the JSPs Reply to Answer is stricken as not permitted under our Regulations and will not be considered here.

## **2. Disposition of Amended JSPs Petition**

In the Amended JSPs Petition, the JSPs make a general request that they are seeking a stay pending resolution of "any appellate proceedings and any required

proceedings on remand.”<sup>12</sup> Amended JSPs Petition at 1. However, upon review of the record, we find that the JSPs have failed to satisfy the standards of *Process Gas, supra*, necessary to justify a stay of our *December 2025 Order*.<sup>13</sup>

First, the JSPs fail to demonstrate a likelihood of success on the merits or even a “substantial case” warranting interim relief. In *Makovsky*, the Commission stated, in pertinent part, that:

[I]n deciding whether to stay one of our orders pending appeal, this Commission should not indulge in a further review of the case. Rather this Commission should concentrate solely on the effect our order will have pending appeal.

*Makovsky* at 511. That principle is the general rule. The Commission has distinguished proceedings in which the “strong showing . . . of a likelihood of success on the merits” is considered in a request for the issuance of a stay after a full and fair opportunity of the parties to the matter to litigate substantive issues has been given, and the Commission has

---

<sup>12</sup> On December 18, 2025, the JSPs filed a Petition for Review of the *December 2025 Order* with the Commonwealth Court docketed at 1667 C.D. 2025. On January 2, 2026, the JSPs filed an Amended Petition that added Enphase to the JSPs group. However, on January 5, 2026, the JSPs filed a Praecipe to discontinue the Commonwealth Court appeal (providing that the Commission’s grant of reconsideration of the *December 2025 Order*, pursuant to Pa. R.A.P. 1701(b)(3), rendered inoperative the petition for review and that the time for filing a petition for review begins to run anew from the date of the entry of a subsequent Commission decision on reconsideration).

<sup>13</sup> As noted, *supra*, the Commission has adopted the standards set forth in *Process Gas* for guidance regarding the issuance of a stay or supersedeas of a Commission Opinion and Order. *See Process Gas*, 467 A.2d at 808-09.

decided such issues, from those proceedings in which we have not decided substantive issues.<sup>14</sup>

The issues raised in the Amended JSPs Petition were fully litigated during the underlying proceeding, addressed by the Commission in its *December 2025 Order*, and resolved against the JSPs. The Commission exercised its authority as the ultimate fact-finder, reviewed the entire evidentiary record, *de novo*, and expressly rejected the JSPs' claims regarding alleged harms, safety concerns, cost-benefit deficiencies, and competitive impacts. The Amended JSPs Petition largely repackages these same arguments, challenging the Commission's weighing of evidence, credibility determinations, and policy judgments, rather than identifying clear legal error or newly emergent issues that would justify a stay. We will not indulge in further consideration of the substantive determinations of the *December 2025 Order*, as we find that all Parties were given a full and fair opportunity for litigation in the underlying proceedings, and Commission review of substantive facts or arguments by the JSPs after a fully litigated proceeding would be a rehashing in contravention of the teachings of *Process Gas*. See also, *Alexia and Lawrence McKnight v. PECO Energy Company*, Docket No. C-2017-2621057 (Opinion and Order entered August 8, 2019) (citing *Scott and Linda Moore v. National Fuel Gas Distribution*, Docket No. C-2014-2458555 (Final Order issued August 25, 2015)).

---

<sup>14</sup> See, *Pa. PUC v. UGI Corp.*, 57 Pa. P.U.C. 83, 88-89 (1983); see also, *Implementation of Act 40 of 2017, Petition of Cypress Creek Renewables, LLC for a Stay or Supersedeas of the Commission's Final Implementation Order Entered May 3, 2018*, Docket No. M-2017-2631527 (Opinion and Order entered August 2, 2018) (finding that "the first prong of the four-part test of whether a stay, requiring the petitioner to make a strong showing that he is likely to prevail on the merits, is applicable in a matter where the Commission has not had an opportunity to rule on the substantive facts at issue").

Second, the JSPs fail to establish irreparable harm. The harms asserted, such as alleged lost sales, increased costs, delays, and market impacts, are fundamentally economic in nature and speculative. We have previously found that mere financial harm, generally, is not a proper basis to support a finding of irreparable harm. *See Petition of Librandi Machine Shop, Inc. For Declaratory Order*, Docket No. P-2018-3000047 (Opinion and Order entered March 10, 2022); *SBG Management Services, Inc., et al.*, Docket Nos. C-2012-2304183, and C-2012-2304324 (Opinion and Order entered March 28, 2019); *In Re Petition of Pennsylvania Electric Company*, Docket No. P-00910518, (Opinion and Order entered March 3, 1993). Moreover, the Commission found that PPL’s DER Management Plan produces measurable system benefits and that the asserted harms were either unsupported or outweighed by those benefits. The JSPs’ assertion that each day of program operation causes irreparable harm is inconsistent with the Commission’s findings and with the fact that DER management activities have already been occurring under the Pilot Program without the harmful consequences alleged.

Third, the JSPs do not show that a stay would avoid harm to other interested parties. To the contrary, staying implementation of the Second DER Management Plan would substantially harm PPL’s customers and the public by delaying operational improvements the Commission determined were in the public interest, including improved voltage management, increased hosting capacity, and enhanced system reliability. A stay would also undermine regulatory certainty by preventing implementation of a Commission-approved program following a full adjudicatory process.

Fourth, the JSPs fail to demonstrate that a stay will not adversely affect the public interest. In determining the public interest, a balancing and evaluation of competing considerations must be performed, *i.e.*, the “benefits and detriments of the proposed transaction on all affected parties must be considered.” *See Opinion and Order*

*re: Stay, March 10, 2022, citing Application of CMV Sewage Company, Inc., Docket No. A-230056F2002 (Opinion and Order entered December 23, 2008) (citing Pa. PUC v. Bell Atlantic-Pennsylvania, Inc., Docket No. R-00953409 (Order entered September 29, 1995)) (CMV Sewage). In CMV Sewage, the Commission noted, with approval, the reasoning of the presiding ALJ, who concluded that the “Commission has historically defined the public interest as including ratepayers, shareholders, and the regulated community.”*

The Commission expressly concluded that continuation and expansion of active DER management serves the public interest. Granting a stay would delay realization of those benefits, while preserving the status quo that the Commission found less effective. As such, we will not contradict our finding, as we do not believe that a stay is in the public interest. To the contrary, it is apparent that any further delay of this proceeding will be adverse to the public interest.

Therefore, the JSPs have failed to meet the standards of *Process Gas*, particularly in failing to show there is any reason to think that they will prevail on the merits and in failing to demonstrate irreparable injury that they will suffer should the stay be denied. As such, in applying the *Process Gas* standards, the Commission determines that a stay should not be granted.

The JSPs request for clarification likewise falls under the Commission’s long-established standard set forth in *Duick*. The JSPs’ clarification requests do not identify any genuine ambiguity in the Commission’s *December 2025 Order* that would prevent compliance or implementation. Instead, they seek substantive changes to the *December 2025 Order*’s effect, such as barring PPL from inverter testing, limiting interconnection conditions, and requiring that an Orchestration Plan and third-party RFP be completed before the Second DER Management Plan may proceed. These requests go

far beyond clarification and would effectively rewrite the Commission's approval framework.

The JSPs' arguments regarding inverter testing authority, interconnection standards, safety findings, and aggregation impacts were all raised and addressed during the underlying proceeding. The Commission expressly rejected the JSPs' claims that PPL lacked authority to impose certain requirements, that the program violated safety codes or interconnection regulations, or that it unlawfully blocked third-party aggregation. Reasserting these positions under the guise of clarification does not satisfy *Duick*, as the JSPs do not identify an overlooked issue, but rather, challenge the Commission's resolution of disputed questions.

Similarly, the JSPs' request that PPL be required to complete an RFP and Orchestration Plan before implementation is not a request for clarification, but an attempt to alter the sequencing and substance of the Commission's directives. The Commission explicitly approved the Second DER Management Plan while also requiring PPL to conduct an RFP and develop an Orchestration Plan within twelve months. The JSPs' disagreement with that policy choice does not establish ambiguity or oversight under *Duick*; it merely reflects dissatisfaction with the Commission's balancing of competing interests.

Finally, *Duick* does not require the Commission to revisit or further explain its reasoning simply because a party believes additional explanation would strengthen its appellate arguments. The Commission is not obligated to expressly address every contention or reiterate its reasoning where the *December 2025 Order* is clear on its face and reflects a considered exercise of discretion. The JSPs' clarification requests therefore fail because they neither raise new or novel issues, nor demonstrate that the Commission overlooked a material matter requiring correction.

Therefore, we shall deny the JSPs Petition, as well as the Amended JSPs Petition, in their entirety. The JSPs have failed to meet the requirements for a stay or supersedeas under *Process Gas*, as they have not shown a likelihood of success on the merits, irreparable harm, absence of harm to others if a stay were granted, or alignment with the public interest. In addition, their requests for clarification fail under *Duick* because they do not identify any overlooked or unresolved issues, but instead seek to re-litigate the merits of the Commission's decision and impose substantive changes to the *December 2025 Order* entered after full adjudication.

### **III. Conclusion**

Upon review, we shall deny the OCA Petition and the JSPs Petition, as well as the Amended JSPs Petition, and grant PPL's Motion to Strike, consistent with this Opinion and Order; **THEREFORE,**

#### **IT IS ORDERED:**

1. That the Motion to Amend the Joint Solar Parties' December 18, 2025, Petition for Clarification and Stay/Supersedeas to Add Enphase Energy, Inc. thereto, filed by American Home Contractors, Inc., the Solar Energy Industries Association, SolarEdge Technologies, Inc., Sun Directed, Tesla, Inc., and Trinity Solar, LLC, on January 5, 2026, is granted, consistent with this Opinion and Order.

2. That the Petition for Reconsideration and/or Clarification filed by the Office of Consumer Advocate, on December 18, 2025, is denied, consistent with this Opinion and Order.

3. That the Petition for Clarification and Stay/Supersedeas filed by American Home Contractors, Inc., the Solar Energy Industries Association, SolarEdge Technologies, Inc., Sun Directed, Tesla, Inc., and Trinity Solar, LLC, on December 18, 2025, as well as the (Amended) Petition for Clarification and Stay/Supersedeas filed by American Home Contractors, Inc., Enphase Energy, Inc., the Solar Energy Industries Association, SolarEdge Technologies, Inc., Sun Directed, Tesla, Inc., and Trinity Solar, LLC, on January 5, 2026, are denied, consistent with this Opinion and Order.

4. That the Motion of PPL Electric Utilities Corporation to Strike the Joint Solar Parties' "Reply" to PPL Electric Utilities Corporation's Answer to the Petition of Joint Solar Parties for Clarification and Stay/Supersedeas, filed by PPL Electric Utilities Corporation on January 2, 2026, is granted, consistent with this Opinion and Order.

5. That this proceeding, at Docket No. P-2024-3049223, remain open, pending satisfactory compliance with the directives set forth in Ordering Paragraph Nos. 5 and 6 of the Commission's Opinion and Order entered on December 3, 2025, at Docket No. P-2024-3049223.

**BY THE COMMISSION,**

A handwritten signature in cursive script, appearing to read "Matthew L. Homsher".

Matthew L. Homsher  
Secretary

(SEAL)

ORDER ADOPTED: March 12, 2026

ORDER ENTERED: March 12, 2026