



Regulation is a maze. We can show you the way!

Judith D. Cassel
717.703.0804
jdassel@hmslegal.com

Micah R. Bucy
717.703.0813
mrbcy@hmslegal.com

Whitney E. Snyder
717.703.0807
wesnyder@hmslegal.com

Kathryn C. Read-Fisher
717.703.0808
kcr@hmslegal.com

501 Corporate Circle, Suite 302, Harrisburg, PA 17110 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

March 20, 2026

Via Electronic Filing

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission, et al. v. PPL Electric Utilities Corporation; Docket Nos. R-2025-3057164, et al.; **SEF STATEMENT IN SUPPORT OF THE JOINT PETITION FOR NON-UNANIMOUS SETTLEMENT**

Dear Secretary Homsher:

Enclosed you will find the Sustainable Energy Fund's Statement in Support of the Joint Petition for Non-Unanimous Settlement in the above-referenced proceeding. Copies of this filing have been served in accordance with the attached Certificate of Service.

Sincerely,

/s/ Whitney E. Snyder

Judith Cassel
Whitney Snyder
Micah R. Bucy
Kathryn C. Read-Fisher

Counsels for The Sustainable Energy Fund

WES/das

cc: Administrative Law Judge Christopher P. Pell (cpell@pa.gov)
Administrative Law Judge Barbara Shadie Nause (bshadienau@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos. 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 The	:	C-2025-3058251
Coalition for Community Solar Access	:	
Rik Bhattacharyya	:	C-2025-3058846
Safiya Junaid	:	C-2025-3058982
Stacey Kimmel-Smith	:	C-2025-3059151
John Gadowski	:	C-2025-3059330
Thatcher Graham	:	C-2026-3060429
Wendy Johnson	:	C-2026-3061012
	:	
v.	:	
	:	
PPL Electric Utilities Corporation	:	

**THE SUSTAINABLE ENERGY FUND’S
STATEMENT IN SUPPORT OF THE
JOINT PETITION FOR NON-UNANIMOUS SETTLEMENT**

I. INTRODUCTION

Petitioner-Intervenor, the Sustainable Energy Fund (“SEF”), submits this Statement in Support of the Joint Petition for Approval of Non-Unanimous Settlement (“Settlement”) in the above-captioned proceeding. SEF participated in this proceeding through the testimony of its President and Chief Executive Officer, John M. Costlow, as well as through discovery and participation in evidentiary hearings. SEF’s testimony addressed several issues implicated by PPL Electric Utilities Corporation’s (“PPL”) proposed rate increase, including funding for the Low-

Income Usage Reduction Program (“LIURP”), the design of electric vehicle time-of-use (“EV TOU”) programs, and aspects of residential rate design.

SEF supports the Settlement as it addresses the issues raised in SEF’s testimony and advances policies that promote affordability, transparency, and effective program design for PPL Electric customers. Accordingly, SEF submits this Statement in Support of Settlement with respect to the Settlement provisions concerning the Low-Income Usage Reduction Program (“LIURP”) and the Electric Vehicle Time-of-Use (“EV TOU”) Charging Program.

Furthermore, SEF supports the Settlement as a whole. Herein, SEF has provided statements in support of the specific terms that raise issues on which SEF has provided testimony. SEF takes no position on the remaining settlement terms which have been designated N/A.

II. STANDARDS FOR APPROVAL OF SETTLEMENT

The Commission has long encouraged parties to resolve contested proceedings through negotiated settlement. 52 Pa. Code § 5.231(a). In evaluating a proposed settlement, the Commission must determine whether the settlement is in the public interest and whether the terms represent a reasonable resolution of the issues presented in the proceeding. *See* 52 Pa. Code § 69.1201.

Under this standard, the Commission considers whether the settlement resolves the issues raised in the proceeding, fairly reflects the interests of the affected parties, and is supported by the record developed in the case. *Id.* A settlement need not represent the preferred outcome of any single party; rather, settlements are often the product of compromise among parties with differing positions. *Id.*

Where a settlement represents a reasonable compromise that addresses the principal issues raised in the proceeding and is supported by the record, the Commission may approve the settlement as being in the public interest.

III. SETTLEMENT TERMS

- A. REVENUE REQUIREMENT – N/A**
- B. REVENUE ALLOCATION – N/A**
- C. RATE DESIGN – N/A**
- D. DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (“DSIC”) – N/A**
- E. STORM DAMAGE EXPENSE RIDER (“SDER”) – N/A**
- F. CUSTOMER SERVICE, LOW INCOME, AND UNIVERSAL SERVICE ISSUES**

1. Low-Income Usage Reduction Program (“LIURP”)

SEF supports the Settlement provision increasing funding for PPL’s Low Income Usage Reduction Program (“LIURP”), which PPL administers through its Winter Relief Assistance Program (“WRAP”). Settlement ¶ 76; App’x D, Proposed Finding of Fact ¶¶ 184–86.

LIURP programs such as WRAP reduce the energy burden for low-income households by delivering permanent usage reduction measures through weatherization, including insulation, appliance upgrades, and other energy efficiency improvements. App’x D, Proposed Finding of Fact ¶¶ 184. These measures reduce household consumption, stabilize customer bills, and help prevent arrearages and service terminations. SEF St. No. 1-R at 2–3.

As originally proposed, PPL’s LIURP funding would not have provided sufficient resources to meaningfully expand WRAP participation or increase the number of income eligible households served through the program. SEF St. No. 1 at 8:4–7; SEF St. No. 1-R at 2–3. SEF therefore recommended that LIURP funding be increased by \$2 million in order to expand WRAP

participation and increase the number of households receiving energy efficiency measures through the program. SEF St. No. 1-R at 2–3.

While the Settlement provides for an increase of \$1.5 million rather than the full increase recommended by SEF, the additional funding represents a meaningful step toward expanding WRAP services and improving affordability for low-income customers. Settlement ¶ 76. Accordingly, SEF supports the Settlement provision increasing LIURP.

G. VEGETATION MANAGEMENT – N/A

H. RELIABILITY – N/A

I. LARGE LOAD INTERCONNECTIONS – N/A

J. MAXIMUM REGISTERED PEAK LOAD – N/A

K. ELECTRIC VEHICLE (“EV”) TIME-OF-USE (“TOU”) CHARGING REBATE PROGRAM AND DIRECT CURRENT FAST CHARGER (“DCFC”) RATE

SEF supports the Settlement provisions addressing PPL’s Electric Vehicle Time-of-Use (“EV TOU”) Charging Program. Settlement ¶¶ 107–117. Time-of-use rate structures can provide customers with clearer price signals that encourage electric vehicle charging during off-peak periods, which can support more efficient use of the electric distribution system and help manage system demand as electric vehicle adoption increases. SEF St. No. 1 at 13–14.

SEF identified several concerns regarding the structure and design of PPL’s proposed EV TOU Charging Program. Because customers’ electric bills include both generation and distribution components, misalignment between generation and distribution time-of-use periods can create confusion for customers attempting to modify charging behavior in response to price signals. SEF St. No. 1 at 14–15; SEF St. No. 1-SR at 3. SEF therefore recommended that the EV TOU on-peak and off-peak periods be aligned with the Default Service generation time-of-use program so that

customers receive a clear and consistent signal regarding when electric vehicle charging is most beneficial to the system. SEF St. No. 1 at 15; SEF St. No. 1-SR at 3.

SEF also emphasized that electric vehicle rate designs should be developed with appropriate stakeholder engagement and evaluated using clear program objectives and performance metrics. Establishing an evaluation framework allows the Commission and stakeholders to assess whether EV-specific rate structures are effectively encouraging off-peak charging behavior and supporting efficient system utilization. SEF St. No. 1 at 15–16; SEF St. No. 1-SR at 4.

The Settlement provisions addressing the EV TOU Charging Program reflect these considerations. Settlement ¶¶ 107–117. The Settlement aligns the EV TOU on-peak and off-peak periods with the Default Service generation time-of-use program and establishes that the EV TOU Charging Program is temporary and subject to reevaluation prior to continuation beyond 2030. Settlement ¶ 107. The Settlement further requires PPL to develop an evaluation plan identifying program objectives, metrics, and milestones, with reporting in the rate case docket to allow for continued stakeholder participation and Commission oversight. Settlement ¶¶ 112–113.

Taken together, these provisions provide appropriate guardrails for the EV TOU Charging Program while preserving the Commission’s ability to evaluate future electric vehicle rate design proposals based on program performance and stakeholder input. Settlement ¶¶ 107–117. Accordingly, SEF supports the Settlement provisions addressing the Electric Vehicle Time-of-Use Charging Program. Settlement.

- L. IT UPGRADES – N/A**
- M. RETAIL TARIFF – N/A**
- N. SUPPLIER TARIFF – N/A**

O. BEHIND-THE-METER NON-EXPORTING BATTERY ENERGY STORAGE SYSTEMS – N/A

IV. VICE CHAIR BARROW’S OCTOBER 23, 2025 STATEMENT

Vice Chair Barrow’s October 23, 2025 Statement identifies several issues for consideration in this proceeding. SEF has reviewed those issues and notes that they largely concern matters outside the scope of SEF’s participation and testimony. SEF’s involvement in this proceeding has focused largely on LIURP and EV TOU program design, and the Settlement reasonably addresses those issues.

Accordingly, SEF submits that the Settlement remains in the public interest with respect to the issues raised by SEF.

V. CONCLUSION

For the reasons set forth above, SEF supports the Joint Petition for Approval of Non-Unanimous Settlement. The Settlement reasonably addresses several issues raised by SEF, including increased funding for the Low-Income Usage Reduction Program (“LIURP”) and improvements to the structure and oversight of the Electric Vehicle Time-of-Use (“EV TOU”) Charging Program.

The Settlement represents a constructive resolution of the issues addressed in SEF's testimony and advances policies that support affordability, transparency, and effective program design for PPL's customers. Accordingly, SEF respectfully requests that the Commission approve the Settlement.

Respectfully submitted,

/s/ Whitney E. Snyder

Judith D. Cassel, Esq., PA I.D. No. 209393
Whitney E. Snyder, Esq., PA I.D. No. 316625
Micah R. Bucy, Esq., PA I.D. No. 320196
Kathryn C. Read-Fisher, Esq., PA I.D. No. 338505
HMS Legal LLP
501 Corporate Circle
Suite 302
Harrisburg, PA 17110
jdcassel@hmslegal.com
wesnyder@hmslegal.com
mrbcy@hmslegal.com
kcr@hmslegal.com

Counsel for the Sustainable Energy Fund

Date: March 20, 2026

CERTIFICATE OF SERVICE
Docket No. R-2025-3057164, et al.

I hereby certify that a true and correct copy of this filing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA EMAIL ONLY

Kimberly A Klock Esquire
Michael J Shafer Esquire
PPL Services Corporation
645 Hamilton Street Suite 700
Allentown PA 18101
kklock@pplweb.com
mjshafer@pplweb.com

(Counsel for PPL)

Devin T Ryan Esquire
Alice A Wade Esquire
Hayley E Wilburn Esquire
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)

David B Macgregor Esquire
Garrett P Lent Esquire
Anthony C. DeCusatis Esquire
Erin R. Kawa Esquire
Post & Schell PC
17th North 2nd Street 12th Floor
Harrisburg PA 17101-1601
dmacgregor@postschell.com
glent@postschell.com
adecusatis@postschell.com
ekawa@postschell.com

(Counsel for PPL)

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

Joseph L Vullo Esquire
Commission of Economic Opportunity
1460 Wyoming Avenue
Forty Fort PA 18704
jlvullo@bvrrlaw.com

(Counsel for CEO)

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

Christy M. Appleby Esquire
Harrison Breitman Esquire
Jacob D. Guthrie Esquire
Josiah B. Harmar, Esquire
Johnathan M. Longhurst, Esquire
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 Esquire
John W Sweet Esquire
Elizabeth R Marx Esquire
Lauren N Berman Esquire
Levi A. Phillips, Esquire
PA Utility Law Project
118 Locust Street
Harrisburg PA 17101
rpereira@pautilitylawproject.org
jsweet@pautilitylawproject.org
emarx@pautilitylawproject.org
lberman@pautilitylawproject.org
pulp@pautilitylawproject.org

Lt. Colonel Carlos S. Ramirez-Vazquez
John J. McNutt, Esquire
U.S. Army Legal Services Agency
Office of The Judge Advocate General
9275 Gunston Road (JALS-TCAP)
Fort Belvoir, VA 22060
Carlos.s.ramirezvazquez.mil@army.mil
John.j.mcnuitt.civ@army.mil

*Counsel for Department of Defense and all other
Federal Executive Agencies (DOD/FEA)*

Daniel Garcia Esquire
Brian J Pulito Esquire
Sarah M. Rambin, Esquire
Stepstone & Johnson PLLC
One PPG Place
Suite 3300
Pittsburgh PA 15222
Daniel.Garcia@Steptoe-Johnson.com
brian.pulito@steptoe-johnson.com
Sarah.rambin@steptoe-johnson.com

*(Counsel for Aspen Power, 38 Degrees, CVE
North America, Syncarpha Capital, LLC, Twilight
Renewables, Bollinger Solar, and CEP
Renewables, LLC (Collectively, Customer-
Generator Coalition))*

Brad and Jennifer Woolley
2914 Hodle Ave
Easton PA 18045-8103
jwoolley4@rcn.com

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

Devin McDougall, Esquire
Logan Welde, Esquire
Lauren Otero, Esquire
Earthjustice
1617 John F. Kennedy Blvd., Suite 2020
Philadelphia, PA 19103
dmcDougall@earthjustice.org
lwelde@cleanair.org
lotero@cleanair.org

*Counsel for POWER Interfaith and Physicians for
Social Responsibility Pennsylvania (PSR PA) and
Energy Justice Advocates*

Daniel B. Markind, Esquire
Flaster Greenberg, PC
1717 Arch Street, Suite 3300
Philadelphia, PA 19103
Daniel.markind@flastergreenberg.com

Counsel for Dimension PA I LLC

Michael Zimmerman, Esquire
Environmental Defense Fund
257 Park Avenue S.
New York, NY 10010
mzimmerman@edf.org

Counsel for EDF

Todd S. Stewart, Esquire
HMS Legal LLP
501 Corporate Circle, Suite 302
Harrisburg, PA 17110
tsstewart@hmslegal.com

*Counsel for Professional Dairy Managers of
Pennsylvania*

Alan M. Seltzer, Esquire
John F. Povilaitis Esquire
Buchanan Ingersoll & Rooney PC
409 N. Second Street, Suite 500
Harrisburg, PA 17101
alan.seltzer@bipc.com
john.povilaitis@bipc.com

Counsel for Joint Solar Advocates

Emma H. Bast, Esquire
Jessica R. O'Neill, Esquire
Citizens for Pennsylvania's Future
1429 Walnut Street, Suite 701
Philadelphia, PA 19102
bast@pennfuture.org
oneill@pennfuture.org

Counsel for EDF, NRDC, and PennFuture

Deanne M. O'Dell, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dodell@eckertseamans.com

Counsel for RESA

Lauren M. Burge, Esquire
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com

Counsel for RESA

Susan E. Bruce, Esquire
Rebecca Kimmel, Esquire
McNees Wallace & Nurick LLC
100 Pine Street, P.O. Box 1166
Harrisburg, PA 17108-1166
sbruce@mcneeslaw.com
rkimmel@mcneeslaw.com

Counsel for Convergent

Adeolu A. Bakare, Esquire
Victoria A. Geddis, Esquire
McNees Wallace & Nurick LLC
100 Pine Street P.O. Box 1166
Harrisburg, PA 17108-1166
abakare@mcneeslaw.com
vgeddis@mcneeslaw.com

Counsel for PPLICA

Mitchell H. Kizner, Esq.
Flaster Greenberg, PC
Commerce Center
1810 Chapel Avenue West
Cherry Hill, NJ 08002
Mitchell.Kizner@flastergreenberg.com

Barry A. Naum, Esquire
Steven W. Lee, Esquire
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
bnaum@spilmanlaw.com
slee@spilmanlaw.com

Jamie L. Martines, Esquire
Spilman Thomas & Battle, PLLC
301 Grant Street, Suite 3440
Pittsburg, PA 15219
jmartines@spilmanlaw.com

Counsel for Walmart Inc.

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

DATE: March 20, 2026

/s/ Whitney E. Snyder
Judith D. Cassel
Whitney E. Snyder
Micah R. Bucy
Kathryn C. Read-Fisher