

**PENNSYLVANIA PUBLIC UTILITY COMMISSION  
HARRISBURG, PENNSYLVANIA 17120**

**Petition of PPL Electric Utilities Corporation for Approval of a Second Modification to its Existing Long-Term Infrastructure Improvement Plan**      **Public Meeting held March 26, 2026  
3034972-TUS  
Docket No. P-2022-3034972**

**STATEMENT OF VICE CHAIR KIMBERLY BARROW**

Before the Commission is the Petition of PPL Electric Utilities Corporation (PPL or Company) for Approval of a Second Modification to its third Long-Term Infrastructure Improvement Plan (LTIIP). PPL's third LTIIP was approved by the Commission on December 22, 2022, at Docket No. P-2022-3034972 and covers the years 2023 through 2027.

The Commission permitted PPL's initial projected spending to increase from \$511.62 million to \$715.04 million over the remainder of the third LTIIP on July 11, 2024. On February 28, 2025, the Commission permitted PPL to increase its Distribution System Improvement Charge (DSIC) cap from 5.0% to 7.5% until the effective date of rates established in its next base rate case or the end of the PPL's third LTIIP, whichever occurs first.<sup>1</sup>

The instant proposed modification revises PPL's projected capital spending on programs and initiatives over the remainder of the third LTIIP from \$715.04 million to \$1.397 billion, almost double the existing capital spending. This significant increase, *inter alia*, is mostly for system reliability improvement projects which the Company plans to increase from \$51.21 million to \$678.77 million.

PPL noted that the requested funding will help with additional storm hardening measures that are designed to strengthen the distribution system and protect against increasing weather-related outages and improve customer experience.

I emphasize that PPL's request presents a confluence of bad facts and circumstances that are driving a drastic increase in its proposed investment. Some of the problems seem wholly self-made by PPL:

- the failure to accurately anticipate the need to replace aging infrastructure that is reaching the end of its useful life and \$37.11 million in substation assets;
- the failure to plan adequately for storm hardening measures in its original LTIIP filing or the 2024 modification to same; and
- the failure to file base rate cases on a more frequent basis than a 10-year cycle.

The occurrence and severity of storms is not within PPL's control, each of aforementioned items are within PPL's ability to cure.

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<sup>1</sup> See, *Petition of PPL Electric Utilities Corporation for a Waiver of the Distribution System Improvement Charge Cap of 5% of Billed Revenues*, Docket No. P-2024-3048732 (Opinion and Order entered February 28, 2025).

While approval of this LTIP would not and does not guarantee rate recovery of PPL's planned investment, the unfortunate, and likely outcome of this substantial LTIP increase will translate into a marked increase in customer rates – rates customers already struggle to afford.

In addition, I note that it may be a coincidence that PPL now seeks this LTIP increase at a time when it is focused on anticipated peak summer load growth of some 60% in the next 5 years and 200% in the next 10 years. While hindsight is 20/20, I think that the need for such a precipitous increase in its LTIP reflects a loss of focus by PPL on system reliability. I caution PPL that I will employ heightened scrutiny to its submissions to this Commission on all fronts.

It is important to note that PPL is currently requesting \$356.3 million in additional annual revenues in its current base rate increase filing before the Commission.<sup>2</sup> The significant increase in capital spending requested by the Company in the instant LTIP Petition and the Company's DSIC cap increase to 7.5%, individually and combined, position PPL to achieve improved customer service metrics. Therefore, I hope to see commensurate significantly improved reliability metrics that are supported by reliable data from the Company in the Commission's next electric reliability report.

**March 26, 2026**



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**Kimberly Barrow, Vice Chair**

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<sup>2</sup> See, *Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation*, Docket No. R-2025-3057164 (Order entered October 23, 2025).