

I believe PPL's IIR process requiring a mandatory deposit payment as a condition of interconnection constitutes an unlawful rate that was not contained in the Company's Commission-approved tariff at that time nor grounded in a binding Interconnection Agreement. I do not find PPL's testimony to be persuasive as it demonstrates that every aspect as to the refundability of the deposit is entirely controlled by PPL and does not render it a refundable deposit. In addition, the refundability of the deposit is irrelevant when determining whether the demand for payment of the deposit is lawful or not. I note that PPL has admitted on the record that it did not request a waiver of the Commission's regulations related to its implementation of the non-refundable deposit requirement. The Company also clearly notes that the non-refundable deposit is not specifically stated in its tariff. Therefore, I agree that the ALJs' analysis and conclusion that there were no Commission regulations or orders at that time authorizing PPL to charge its deposit in advance and therefore, PPL's deposit constitutes an unlawful rate.

In conclusion, and as acknowledged repeatedly by the ALJs as well as TotalEnergies, it is indisputable that the costs of the facilities to accommodate interconnection of the customer-generator are the responsibility of the customer-generator, not the EDC. However, the issue in this case does not turn on whether PPL is authorized to recover the costs incurred for accommodating interconnection but rather how those costs are arrived at and when the interconnection customer is legally obligated to pay those costs.

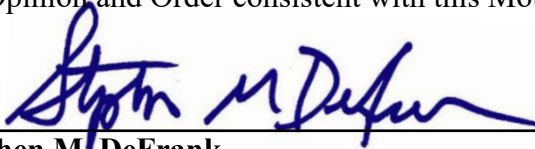
I wish to note that PPL's pending base rate case Settlement, approved as modified by the Commission at our June 4, 2026 Public Meeting, does include a deposit requirement for interconnection applications. I also take this opportunity to highlight this issue for all other EDCs and ask that they make any tariff supplement filings necessary to ensure all deposit requirements for interconnection applications are properly reflected in their tariffs.

Based on my review of the record, I propose denial of PPL's Exceptions and adoption of the Initial Decision.

THEREFORE, I MOVE THAT:

1. The Exceptions filed by PPL Electric Utilities Corporation on October 2, 2025, to the Initial Decision of Administrative Law Judges Steven K. Haas and F. Joseph Brady, issued September 12, 2025, at Docket No. C-2024-3051475 are denied.
2. The Initial Decision of Administrative Law Judges Steven K. Haas and F. Joseph Brady, issued on September 12, 2025, is adopted, consistent with the Motion.
3. The Formal Complaint filed by TotalEnergies Distributed Generation USA, LLC against PPL Electric Utilities Corporation, on September 30, 2024, at Docket No. C-2024-3051475, is sustained, consistent with this Motion.
4. The Office of Special Assistants draft an Opinion and Order consistent with this Motion.

June 18, 2026
Date



Stephen M. DeFrank
Chairman