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July 6, 2026

VIA ELECTRONIC FILING

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

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

Dear Secretary Homsher:

Enclosed for filing is the Answer of PPL Electric Utilities Corporation to the Customer-Generator Coalition's Petition for Reconsideration and Clarification in the above-referenced proceeding.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Devin Ryan

DR/sa
Enclosures

cc: The Honorable Christopher P. Pell (*via Email; w/ enclosures*)
The Honorable Barbara Shadie Nause (*via Email; w/ enclosures*)
Office of Special Assistants (*via Email; w/ enclosures*)
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 Gadomski	:	C-2025-3059330
Thatcher Graham	:	C-2026-3060429
Wendy Johnson	:	C-2026-3061012
Kenneth Johnson	:	C-2026-3061118
Diane Cheer	:	C-2026-3061706
	:	
v.	:	
	:	
PPL Electric Utilities Corporation	:	

ANSWER OF PPL ELECTRIC UTILITIES CORPORATION TO THE CUSTOMER-GENERATOR COALITION'S PETITION FOR RECONSIDERATION AND CLARIFICATION

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Dated: July 6, 2026

Counsel for PPL Electric Utilities Corporation

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PPL Electric Utilities Corporation ("PPL Electric" or the "Company"), pursuant to 52 Pa. Code §§ 5.61 and 5.572, hereby respectfully submits this Answer to the Petition for Reconsideration and Clarification filed by Aspen Power Partners LLC, 38 Degrees North, Bollinger Solar, CEP Renewables, LLC, CVE North American, Dynamic Energy Solutions, LLC, EDPR NA Distributed Generation LLC, Encore Renewable Energy, GS Power Partners, Prospect14 LLC, Radial Power LLC, Reading Anthracite Company, Scale Microgrids, Schuylkill Reclamation Corporation, Solar Renewable Energy, LLC, SR1 Captura Sage Holdco I, LLC, Syncarpha Capital, LLC (collectively, "Customer-Generator Coalition" or "CGC") in the above-captioned proceeding. In its Petition, CGC seeks to challenge various aspects of the Pennsylvania Public Utility Commission's ("Commission") June 11, 2026 Opinion and Order ("Order"), which denied CGC's Exceptions, modified the Recommended Decision to exempt agricultural customer-generators from the Maximum Registered Peak Load ("MRPL") provisions of the Joint Petition for Non-Unanimous Settlement of All Issues ("Settlement"), and approved the Settlement as modified.

As explained herein, CGC's Petition has no merit and should be denied. CGC re-raises arguments that the Commission already considered and rejected in its Order, including that the Company's MRPL contravenes 52 Pa. Code § 54.182 and that the *UGI DSP V*[1] and *Citizens' Electric*[2] decisions are distinguishable. *See* Petition, pp. 3-10. As such, those arguments fail to meet the *Duick*[3] standard for reconsideration or clarification.

[1] *See Petition of UGI Utils., Inc. – Elec. Div. for Approval of a Default Serv. Plan for the Period of June 1, 2025 through May 31, 2029*, Docket Nos. P-2024-3049343, 2025 Pa. PUC LEXIS 68 (Order entered Feb. 20, 2025) ("*UGI DSP V*"), *affirmed*, *Penn Renewables, LLC v. Pa. PUC*, 2026 Pa. Commw. LEXIS 88 (Pa. 2026) ("*Penn Renewables*").

[2] *Pa. PUC v. Citizens' Electric Co.*, Docket Nos. R-2025-3054394, *et al.*, pp. 68-76 (Order entered Jan. 15, 2026) ("*Citizens' Electric*").

[3] *Duick v. Pennsylvania Gas and Water Co.*, 56 Pa. P.U.C. 553, 559 (1982) ("*Duick*").

In addition, CGC fails to acknowledge the importance of the Commonwealth Court publishing its decision in *Penn Renewables* on May 26, 2026, which made the case binding precedent on the Commission and, therefore, directly disposes of issues raised by CGC throughout this proceeding. Also, CGC incorrectly asserts that the *Penn Renewables* case only "addressed the lawfulness" of UGI Utilities, Inc. – Electric Division's ("UGI Electric") "Supply Peak Load Impact methodology under the [Alternative Energy Portfolio Standards ('AEPS')] Act and Section 1304 of the Code" and did not address whether UGI Electric's methodology could "modify the operation of a Commission regulation." (Petition, pp. 8-9.) In actuality, the Commonwealth Court dealt with that issue head-on when it found that UGI Electric requested the Commission to waive "certain regulations that would otherwise prevent UGI from classifying its customers using the aforementioned 100 kW threshold and SPLI mechanism" and that the Commission had the authority to grant a waiver of its regulations.[4] As noted in the Commission's Order, the Company has requested any and all such waivers of the Commission's regulations that are needed to implement the MRPL. *See* Order, p. 168.

Furthermore, CGC asks the Commission to clarify the "legal and evidentiary standard" employed by the Commission to support assigning customer-generators based on the MRPL and how the record supports a finding under such standard, when the answers to those questions are patently clear from reviewing the Commission's Order. (Petition, p. 12.) No further clarification on that front is necessary or warranted. Similarly, CGC requests that the Commission clarify the "legal, regulatory, or evidentiary considerations underlying the Zerfuss Motion and explain how those considerations are reconciled with the broader rationale supporting application of the MRPL

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[4] *Penn Renewables*, 2026 Pa. Commw. LEXIS at *19.

provisions to other customer-generators." (Petition, p. 14.) Again, the Commission directly addressed these questions already in its Order, and no clarification is required.

For these reasons, and as explained further herein, CGC's Petition should be denied.

I. INTRODUCTION AND BACKGROUND

1. PPL Electric is a public utility that provides electric distribution and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission. PPL Electric furnishes electric distribution, transmission, and provider of last resort electric supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of 29 counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

2. The above-captioned proceeding was initiated on September 30, 2025, when PPL Electric filed Original Tariff Electric – Pa. P.U.C. No. 202 ("Tariff No. 202") and Original Tariff Electric – Pa. P.U.C. No. 2S ("Tariff No. 2S") with the Commission. Tariff Nos. 202 and 2S were issued to be effective for service rendered on or after December 1, 2025. In Tariff No. 202, PPL Electric proposes a general increase in annual base electric distribution revenue of $356,271,443. The filing was made in compliance with the Commission's regulations and contains all supporting data and testimony required to be submitted in conjunction with a tariff change seeking a general rate increase.

3. On October 23, 2025, the Commission entered an Order suspending Tariff Nos. 202 and 2S by operation of law until July 1, 2026, unless otherwise directed by Order of the Commission. Vice Chair Barrow also issued a Statement regarding the proceeding.

4. The public input hearings were held as scheduled on December 8-11 and 18, 2025.

5. On December 22, 2025, written direct testimony and exhibits were served by the Commission's Bureau of Investigation and Enforcement ("I&E"), the Office of Consumer Advocate ("OCA"), the Office of Small Business Advocate ("OSBA"), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), the Commission on Economic Opportunity ("CEO"), CGC, Convergent Energy and Power LP ("Convergent"), the Envrionmental Justice Advocates ("EJA"), the Environmental Intervenors ("EI"), the Joint Solar Advocates ("JSA"), the Professional Dairy Managers of Pennsylvania ("PDMP"), the PP&L Industrial Customer Alliance ("PPLICA"), the Retail Energy Supply Association ("RESA"), the Sustainable Energy Fund ("SEF"), and Walmart Inc. ("Walmart").

6. Various comments were filed by individuals in the proceeding regarding the proposed base rate increase as well.

7. On January 23, 2026, written rebuttal testimony and exhibits were served by PPL Electric, CGC, I&E, IGS Solar, JSA, OCA, OSBA, PPLICA, RESA, SEF, and Walmart.

8. On February 9, 2026, written surrebuttal testimony and exhibits were served by PPL Electric, CAUSE-PA, CGC, Convergent, EI, EJA, I&E, JSA, OCA, PDMP, PPLICA, RESA, and SEF.

9. On February 13, 2026, written rejoinder testimony and exhibits were served by PPL Electric.

10. On February 16, 2026, PPL Electric filed the Company's Errata to PPL Electric Statement Nos. 12, 12-R, and 8-RJ.

11. On February 17, 2026, the first day of the evidentiary hearing commenced. The following parties, with their respective counsel, were present: PPL, I&E, OSBA, OCA, CEO, CAUSE-PA, CGC, JSA, EJA; Dimension PA 1 LLC ("Dimension"), EI, RESA, PDMP, Walmart,

PPLICA, SEF, Convergent, and IGS Solar. A modified litigation schedule was adopted at the outset of the hearing, which provided for two additional rounds of pre-served testimony on the MRPL issue, and a one-day hearing on March 9, 2026.

12. On March 2, 2026, written surrejoinder testimony and exhibits were served by OSBA, CGC, and Walmart, and on March 6, 2026, written sur-surrejoinder testimony and exhibits were served by PPL Electric and CGC.

13. On March 9, 2026, the further evidentiary hearing on the MRPL was held as scheduled.

14. On March 13, 2026, the Joint Petition for Non-Unanimous Settlement of All Issues was filed.

15. On March 20, 2026, 16 of the 17 Joint Petitioners individually filed Statements in Support, while CGC and PDMP each filed a Statement in Opposition.

16. On April 1, 2026, the Joint Petitioners filed an Amended Appendix C for the Settlement, regarding the Bill Impacts under the agreed-upon revenue increase and rate design.

17. On April 17, 2026, the Commission issued the ALJs' Recommended Decision, which recommended approval of the Settlement without modification.

18. On April 27, 2026, CGC filed its Exceptions to the Recommended Decision.

19. On June 11, 2026, the Commission entered its Order denying CGC's Exceptions, modifying the Recommended Decision to exempt agricultural customer-generators from the MRPL provisions of the Settlement, and approving the Settlement as modified.

20. On June 26, 2026, CGC filed its Petition for Reconsideration and Clarification.

21. On June 30, 2026, PPL Electric filed its Compliance Retail and Supplier Tariffs pursuant to the Order.

II. LEGAL STANDARDS

22. The Commission's standard for granting reconsideration following final orders is set forth in *Duick* (emphasis added):

> 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. In this regard we agree with the Court in the Pennsylvania Railroad Company case, wherein it was said that "[p]arties …, <u>cannot</u> be permitted by a second motion to review and reconsider, to <u>raise the same questions which were specifically considered and decided against them</u>…." <u>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</u>.

23. Consequently, for a petition to warrant reconsideration by the Commission, it must demonstrate new and novel arguments that were raised below by the petitioner but not previously considered by the Commission.

24. The Commission has cautioned that the last portion of the operative language of the *Duick* standard – "by the Commission" – focuses on the deliberations of the Commission, not the arguments of the parties.[5] Therefore, a petition for reconsideration cannot be used to raise new arguments or issues that should have been but were not previously raised.

25. The decision whether to grant a petition for clarification is similarly guided by the application of the standards set forth in *Duick,* 56 Pa. P.U.C. at 559 (1982).[6]

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[5] *See Pa. PUC v. PPL Elec. Utils. Corp.*, Docket No. R-2012-2290597, p. 3 (Order entered May 22, 2014).

[6] *Application of PPL Elec. Utils. Corp.*, Docket Nos. A-2009-2082652, *et al.*, 2010 Pa. P.U.C. LEXIS 1707, *3-4 (Order entered Apr. 23, 2010).

III. ARGUMENT

A. CGC'S REQUESTS FOR RECONSIDERATION AND CLARIFICATION SHOULD BE DENIED

26. CGC's requests for reconsideration and clarification should be denied because they do not meet the Commission's standard for reconsideration or clarification.

27. In its Petition, the CGC requests reconsideration or clarification of the following issues:[7]

a. Clarify whether: (1) "[e]xported generation constitutes 'demand' within the meaning of Section 54.182"; (2) "[t]he approved tariff merely implements Section 54.182"; or (3) "[t]he Commission is relying upon independent statutory authority to permit alteration of the regulatory construct embedded in Section 54.182." (Petition, pp. 7-8.)

b. Clarify whether "the Commission intended to hold that *UGI DSP V* and *Citizens' 2025 Rate Case* resolved that issue as a matter of law, or whether the Commission independently determined that PPL's proposed application of MRPL is permissible under Section 54.182 notwithstanding the absence of such a holding in those prior proceedings." (Petition, p. 10.)

c. Clarify "the legal and evidentiary standard supporting the assignment of customer-generators to GSC-2 under the MRPL construct and explain how the record satisfies that standard." (Petition, p. 12.)

---

[7] In the "Conclusion" section of its Petition, CGC makes two additional requests for reconsideration or clarification that are not made in the "Arguments for Reconsideration" section of the Petition: (1) "that approval of the tariff language does not constitute a determination that exported generation may be treated as customer demand in future proceedings"; and (2) "that the Commission's approval of the settlement does not foreclose future consideration of these issues through rulemaking proceedings or subsequent adjudications." (Petition, p. 15.) Because CGC does not develop these requests in its Petition, PPL Electric likewise cannot and does not address them in full. However, the Company observes that the Commission can determine the legal significance of its Order in future proceedings and need not address these issues now.

d. Clarify "the legal, regulatory, or evidentiary considerations underlying the Zerfuss Motion and explain how those considerations are reconciled with the broader rationale supporting application of the MRPL provisions to other customer-generators." (Petition, p. 14.)

28. Initially, the Company notes that while styled as requests for "clarification" in the "Arguments for Reconsideration" section of the Petition, in the "Conclusion" section, CGC asks that the "Commission grant reconsideration, modify the Opinion and Order, and clarify" aspects of its Order.

29. Therefore, CGC is seeking substantive reconsideration of these aspects of the Commission's Order.

30. Regardless of whether they are styled as requests for clarification or reconsideration, as explained below, CGC's requests should be denied, as explained in the following sections.

1. PPL Electric's MRPL Comports with 52 Pa. Code § 54.182 and Even if It Did Not, the Company Requested Any and All Waivers of Commission Regulations that Are Required to Implement the MRPL

31. The Commission should reject CGC's request to clarify whether: (1) "[e]xported generation constitutes 'demand' within the meaning of Section 54.182"; (2) "[t]he approved tariff merely implements Section 54.182"; or (3) "[t]he Commission is relying upon independent statutory authority to permit alteration of the regulatory construct embedded in Section 54.182." (Petition, pp. 7-8.)

32. CGC already argued in its Exceptions that the MRPL provisions of the Settlement conflict with the Public Utility Code and the Commission's regulations, including 52 Pa. Code § 54.182. (*See* CGC Exceptions, pp. 6-9.)

33. In fact, on page 192 of the Commission's Order, the Commission summarized CGC's Exceptions as follows, in pertinent part:

> Turning to our disposition of CGC's Exceptions, we note that all five of CGC's Exceptions are interrelated, as they appear to advance one overarching argument: that the MRPL provisions of the Settlement cannot lawfully be approved merely as a negotiated compromise because, in CGC's view, they independently fail the legal, evidentiary, and public-interest standards that apply to tariffed rate classifications. Stated another way, CGC's Exceptions all build around the same central theory that the MRPL provisions of the Settlement improperly convert a demand-based regulatory concept into a net-power-flow/export-based classification mechanism, and that this change is allegedly unlawful, unsupported, discriminatory, and insufficiently analyzed. Accordingly, our disposition herein simultaneously resolves and rejects all five Exceptions and adopts the ALJs' recommendation to approve the MRPL provisions of the Settlement, without modification.
>
> In its Exceptions, CGC largely repeats arguments that the ALJs considered and rejected: that the MRPL provisions of the Settlement are inconsistent with the Code and Commission Regulations, are not in the public interest, lack substantial evidence, were not adequately analyzed, and were approved under the wrong standard for a non-unanimous settlement. Upon review, we find that the ALJs applied the proper standard, reviewed the MRPL record in detail, and correctly concluded that PPL's MRPL proposal, as modified by the Settlement, is lawful, just and reasonable, supported by substantial evidence, and consistent with Commission precedent.

Order, p. 192.

34. Therefore, CGC's request for reconsideration or clarification on this point does not meet the *Duick* standard and should be rejected on that ground alone.

35. To the extent that the Commission considers CGC's request on the merits, it should be denied as well.

36. In the Company's Replies, PPL Electric explained how the ALJs properly rejected CGC's arguments and found that the MRPL provisions are consistent with the Commissions' regulations. (*See* PPL Replies, pp. 14-15.)

37. In fact, the Company observed that "[n]ot only are the MRPL provisions consistent with the Commission's regulations, they are expressly authorized by those regulations." (PPL Replies, p. 14.)

38. Throughout this proceeding, CGC has disregarded how the Commission's regulations permit EDCs to further define "maximum registered peak load" in their tariffs, as the Company has proposed doing here. *See* 52 Pa. Code § 54.182; (PPL Electric St. No. 15, p. 4.)

39. In particular, Section 54.182 of the Commission's regulations defines the term "*Maximum registered peak load*" as "The highest level of demand for a particular customer, based on the PJM Interconnection, LLC, 'Peak Load Contribution Standard,' or its equivalent, <u>and as may be further defined by the EDC tariff in a particular service territory</u>." 52 Pa. Code § 54.182 (emphasis added).

40. PPL Electric's MRPL, as modified by the Settlement and Commission, further defines the MRPL in its retail electric tariff as authorized by that language in Section 54.182. (*See, e.g.*, PPL Electric St. No. 15, p. 4.)

41. CGC tries to avoid that controlling language by focusing on the term "demand" used in Section 54.182. (*See* Petition, pp. 3-4.)

42. According to CGC, "[i]f exported generation may be substituted for demand when determining MRPL, the result is not a further definition of demand but a modification of the underlying regulatory standard itself." (Petition, p. 6.)

43. CGC believes that "[s]uch a change would ordinarily require amendment of Section 54.182 through rulemaking rather than approval of a utility-specific tariff provision in rate proceeding." (Petition, pp. 6-7.)

44. CGC's interpretation of Section 54.182 is fatally flawed.

45. The language "as may be further defined by the EDC tariff in a particular service territory" is not limited to "[t]he highest level of demand for a particular customer." 52 Pa. Code § 54.182.

46. Section 54.182 of the Commission's regulations sets forth definitions for several terms, including MRPL. *See id.*

47. Therefore, the language "as may be further defined by the EDC tariff in a particular service territory" is referring to the term "maximum registered peak load" as a whole, not "[t]he highest level of demand for a particular customer." *Id.*

48. Thus, the Commission's regulations specifically authorize a different definition of MRPL to be included in a utility's tariff, subject to Commission review and approval.

49. Even if that critical language did not exist in Section 54.182, CGC fails to recognize that PPL Electric requested any and all such waivers of the Commission's regulations, including the customer groupings recommended in 52 Pa. Code §§ 54.187 and 69.1805, that are needed to implement the MRPL. (*See* PPL Electric St. No. 15, p. 9.)

50. The Company's request for such waivers essentially renders CGC's regulatory interpretation question moot because regardless of whether the MRPL is specifically authorized by Section 54.182 (as argued by PPL Electric) or prohibited by that regulation (as argued by CGC), PPL Electric requested any and all such waivers of the Commission's regulations necessary to implement the MRPL.

51. Accordingly, as the Commonwealth Court determined in *Penn Renewables*, the only issue is whether the MRPL comports with the AEPS Act and is supported by substantial evidence.[8]

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[8] *Penn Renewables*, 2026 Pa. Commw. LEXIS 88, at *19-20.

52. Like the Commonwealth Court found in *Penn Renewables*, the answer here is a resounding yes.[9]

2. The Commission Based its Decision on the Evidence and Arguments Presented in this Proceeding, Along with Relevant and Applicable Legal Authorities

53. The Commission also should reject CGC's request to clarify whether "the Commission intended to hold that *UGI DSP V* and *Citizens' 2025 Rate Case* resolved that issue as a matter of law, or whether the Commission independently determined that PPL's proposed application of MRPL is permissible under Section 54.182 notwithstanding the absence of such a holding in those prior proceedings." (Petition, p. 10.)

54. The "issue" that CGC is referring to is whether Section 54.182 permits MRPL to be defined, as set forth in the Settlement and modified by the Commission, in the Company's Commission-approved tariff. (Petition, pp. 9-10.)

55. As explained in the prior section, the Commission already considered and rejected CGC's arguments that Section 54.182 of the Commission's regulations does not authorize the Company to define MRPL in its tariff in this manner.

56. Therefore, CGC's request for reconsideration or clarification on this subject should be denied for that reason alone.

57. If the Commission considers the merits of CGC's arguments, which it should not, they should be rejected as well.

58. It is incontrovertible that the Commission based its ruling on an in-depth evaluation of the parties' evidence and arguments in this proceeding. *See, e.g.*, Order, pp. 187-202.

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[9] *See id.*; Order, pp. 192-202.

59. As part of that evaluation, the Commission relied on the *UGI DSP V* and *Citizens' Electric* cases as support for its rejection of CGC's arguments against the MRPL. *See* Order, pp. 196-201.

60. Despite the soundness of its decisions in *UGI DSP V* and *Citizens' Electric*, the Commission found that "[f]or PPL specifically, the Joint Petitioners' position is stronger because the record contains specific evidence of GSC-1 default-service rate impacts." *Id.*, p. 200.

61. The Commission also dealt directly with the arguments raised by CGC in this proceeding, including CGC's flawed claim that the Company's MRPL conflicts with Section 54.182 of the Commission's regulations. *See, e.g.*, Order, pp. 187-202.

62. Just like the ALJs, the Commission "made independent findings that PPL's MRPL proposal, as modified by the Settlement, is just and reasonable, supported by the record, and fully comports the AEPS Act, the Code, Commission Regulations, and Commission precedent." *Id.*, p. 196.

63. Consequently, the Commission properly based its decision on the evidence and arguments presented in this proceeding, as well as relevant and applicable legal authorities.

3. CGC's Request for the Commission to Clarify the "Legal and Evidentiary Standard" Used to Support the MRPL and Explain How the Record Satisfies that Standard Should be Rejected

64. The Commission also should deny CGC's request that the Commission clarify "the legal and evidentiary standard supporting the assignment of customer-generators to GSC-2 under the MRPL construct and explain how the record satisfies that standard." (Petition, p. 12.)

65. CGC already raised arguments about the "proper standard" that should be employed when ruling on the MRPL provisions of the Settlement. *See, e.g.*, Order, p. 192.

66. The Commission observed how "the ALJs recognized that a non-unanimous settlement must be supported by substantial evidence, must produce just and reasonable rates, must be in the public interest, and must conform to Commission orders and Regulations." *Id.*, p. 196.

67. The Commission held that this standard is the "proper standard" and was applied when the ALJs reviewed and approved the Company's MRPL proposal, as modified by the Settlement. *Id.*, p. 192.

68. In fact, this is the same standard recounted by CGC in its Exceptions as the "STANDARD GOVERNING REVIEW OF THE RECOMMENDED DECISION AND NON-UNANIMOUS SETTLEMENT." (CGC Exceptions, pp. 5-6.)

69. Nothing in the Commission's Order indicates that the Commission failed to apply this well-established standard when approving the Settlement, as modified by the Commission, and denying CGC's Exceptions.

70. The Commission examined, at length, the parties' evidence and legal arguments on the MRPL, including the evidence supporting the classification of no-load customer-generators in Rate GSC-2. *See, e.g., id.*, 128-202.

71. Through that analysis, the Commission determined that the Company's MRPL, as modified by the Settlement, meets the applicable legal standard with one exception: "that for agricultural operations, the record does not support a finding that farm digesters present the harm the MRPL provisions of the Settlement were design to address," so that class of customers should be exempted from the MRPL. *Id.*, pp. 191-92; *see id.*, pp. 187-202.

72. Therefore, CGC's request for reconsideration and clarification is unnecessary and should be denied.

4. The Commission Does Not Need to Clarify Commissioner Zerfuss's Motion or Reconcile the Commission's Modification of the MRPL Pursuant to that Motion with the Application of the MRPL to Non-Agricultural Customer-Generators

73. The Commission should reject CGC's request that the Commission clarify "the legal, regulatory, or evidentiary considerations underlying the Zerfuss Motion and explain how those considerations are reconciled with the broader rationale supporting application of the MRPL provisions to other customer-generators." (Petition, p. 14.)

74. As noted previously, the Commission held that the Company's MRPL, as modified by the Settlement, meets the applicable legal standard with one exception: that agricultural customer-generators should be exempted from the MRPL. *See* Order, pp. 187-202.

75. The Commission, pursuant to Commissioner Zerfuss's Motion, modified the MRPL provisions to exempt agricultural customer-generators because "as currently drafted, these provisions of the Settlement would place agricultural biogas customer-generators in a classification that was not designed for them and does not fit their operations." *Id.*, p. 188.

76. The Commission stated that "the MRPL provisions of the Settlement target large, 'no-load' net-metering operations,"[10] which "that send nearly all their power to the grid and consume very little power on-site." *Id.*

77. "Conversely, while the MRPL framework, as currently constructed, would also encompass farm-based biogas digesters," the Commission determined that "the record does not establish that these entities fit that profile." *Id.*

78. The Commission further explained that "[f]or these farms, biogas is not a side business," but rather "a critical part of how the farm works" by capturing methane and using that methane "for continuous on-site generation." *Id.*, p. 189.

[10] These operations are the ones operated by or intended to be operated by CGC's members.

79. Additionally, the Commission pointed to the "economic and environmental benefits" produced by these systems, as they help "manage manure, reduce odors, mitigate methane emissions, and return digestate to the fields as fertilizer, or as bedding for animals." *Id.*

80. Therefore, the Commission concluded that "the record does not support treating" these systems "as though they were merchant generators." *Id.*, p. 190.

81. Thus, the Commission already explained in detail why it was appropriate to exempt agricultural customer-generators from the MRPL while not exempting other customer-generators, like the merchant generator systems that CGC's members operate or intend to operate.

82. As a result, the Commission should deny CGC's request for reconsideration and clarification on this issue.

83. Based on the foregoing, the Commission should deny the CGC's requests for reconsideration and clarification and affirm the well-reasoned findings and conclusions set forth in the Commission's Order.

IV. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission dismiss the Customer-Generator Coalition's Petition for Reconsideration and Clarification and affirm the well-reasoned findings and conclusions set forth in the June 11, 2026 Opinion and Order.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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).

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