

COMMONWEALTH OF PENNSYLVANIA



DARRYL A. LAWRENCE
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
(800) 684-6560

 @pa_oca
 /pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

July 8, 2026

Via Electronic Filing

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

Re: Application of PPL Electric Utilities Corporation, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to (1) Bifurcate and Rebuild 4.4 Miles of the Existing Sunbury-Susquehanna #1 230 kV Transmission Line; (2) Construct 0.9 Miles of New Transmission Line Tap for Future 230 kV Double-Circuit Operation; (3) Raise Approximately 0.5 Miles of the Sunbury-Susquehanna 500 kV Transmission Line; and (4) Construct 11.2 Miles of New Double-Circuit 230 kV Transmission Line for Future Double-Circuit 500 kV Capacity, Located in Black Creek, Hazle, Hollenback, Nescopeck, and Sugarloaf Townships in Luzerne County, Pennsylvania; Docket No. A-2026-3061547;

Application of PPL Electric Utilities Corporation Under 15 Pa.C.S. § 1511(c) For A Finding And Determination That The Service To Be Furnished By The Applicant Through Its Proposed Exercise Of The Power Of Eminent Domain To Acquire A Certain Portion Of The Lands of Baidwan Investments LLC in Hazle Township, Luzerne County, Pennsylvania For The Sugarloaf 500/230 kV Transmission Line Associated With The Proposed Sugarloaf 500/230 kV Transmission Line Project Is Necessary Or Proper For The Service, Accommodation, Convenience, Or Safety Of The Public; Docket No. A-2026-3061549 et al.; and,

Petition of PPL Electric Utilities Corporation for Findings that a Structure to Shelter Electrical and Control Equipment at the Proposed Nescopeck Switchyard in Nescopeck Township, Luzerne County, Pennsylvania Is Reasonably Necessary for the Convenience or Welfare of the Public; Docket No. P-2026-3061609

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
July 8, 2026
Page 2

Dear Secretary Homsher:

Attached for electronic filing, please find the Office of Consumer Advocate's Prehearing Memorandum in this proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Jacob Guthrie
Jacob Guthrie, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 334367
Email: JGuthrie@paoca.org

Enclosures

cc: Administrative Law Judge Steven K. Haas (Via Email Only: sthaas@pa.gov)
Administrative Law Judge Emily A. Farren (Via Email Only: efarren@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

Application of PPL Electric Utilities Corporation, Filed : Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for : Approval to (1) Bifurcate and Rebuild 4.4 Miles of the : Existing Sunbury-Susquehanna #1 230 kV Transmission : Line; (2) Construct 0.9 Miles of New Transmission Line : Tap for Future 230 kV Double-Circuit Operation; (3) Raise : Approximately 0.5 Miles of the Sunbury Susquehanna 500 : kV Transmission Line; and (4) Construct 11.2 Miles of New : Double-Circuit 230 kV Transmission Line for Future : Double-Circuit 500 kV Capacity, Located in Black Creek, : Hazle, Hollenback, Nescopeck, and Sugarloaf Townships in : Luzerne County, Pennsylvania :	Docket Nos. A-2026-3061547
Application of PPL Electric Utilities Corporation under 15 : Pa.C.S. § 1511(c) for a Finding and Determination that the : Service to Be Furnished by the Applicant Through Its : Proposed Exercise of the Power Of Eminent Domain to : Acquire Certain Portions of Lands in Black Creek, Hazle, : Hollenback, Nescopeck, and/or Sugarloaf Townships, : Luzerne County, Pennsylvania for the Sugarloaf 500/230 : kV Transmission Line Associated with the Proposed : Sugarloaf 500/230 kV Transmission Line Project Is : Necessary or Proper for the Service, Accommodation, : Convenience, or Safety of the Public :	A-2026-3061549 <i>et al.</i>
Petition of PPL Electric Utilities Corporation for Findings : that a Structure to Shelter Electrical and Control Equipment : at the Proposed Nescopeck Switchyard in Nescopeck : Township, Luzerne County, Pennsylvania Is Reasonably : Necessary for the Convenience or Welfare of the Public :	P-2026-3061609

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s Prehearing Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 8th day of July 2026.

SERVICE BY E-MAIL ONLY

Michael J. Shafer, Esq.
PPL Services Corporation
645 Hamilton Street
Suite 700
Allentown, PA 18101
mjshafer@pplweb.com
Counsel for PPL

Alison Kaster, Esq.
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
2nd Floor, Room-N201
Harrisburg, PA 17120
akaster@pa.gov
Director of I&E

Justin P. Richards, Esq.
Elliott Greenleaf, P.C.
15 Public Square, Suite 210
Wilkes-Barre, PA 18701
jpr@elliottgreenleaf.com
*Counsel for Michael and Deena Bereznak;
Mark L. Clark; Erika K. and Anthony J.
Cook; Michael F. Dunleavy; Jill Groce;
John G. and Melissa Kramer; Wendy
Larock and Patricia Kisenwether; Paul
and Mary Malone; Robert J. Pope; Jason
and Melissa Ritz; Sugar Maple Trails,
LLC; William John and Cynthia A.
Tressler; Jason D. Zola; Daniel E. Zola;
Erik D. Sharkey; Tiffany M. Sharkey; and
George Larock*

Daniel E. Zola, Esq.
Zola Law Offices, Inc.
129 Susquehanna Boulevard
West Hazleton, PA 18202
azola@zolalaw.com
*Counsel for Jason D. Zola;
and Daniel E. Zola*

David B. MacGregor, Esq.
Garrett P. Lent, Esq.
Lindsay A. Berkstresser, Esq.
Megan E. Rulli, Esq.
Hayley E. Wilburn, Esq.
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101
dmacgregor@postschell.com
glent@postschell.com
lberkstresser@postschell.com
mrulli@postschell.com
hwilburn@postschell.com
Counsel for PPL

NazAarah Sabree
Office of Small Business Advocate
555 Walnut Street
1st Floor Forum Place
Harrisburg, PA 17101
ra-sba@pa.gov
Small Business Advocate

John G. Dean, Esq.
Elliott Greenleaf, P.C.
15 Public Square, Suite 210
Wilkes-Barre, PA 18701
jgd@elliottgreenleaf.com
*Counsel for Richard and Bridget Caputo; and
John F. and Jill M. Zola*

Louise A. Knight, Esq.
3610 Logan Court, Unit 3B
Camp Hill, PA 17011
attylknight@gmail.com
*Counsel for Richard and Bridget Caputo; and
John F. and Jill M. Zola*

John D. Butala
Victoria A. Butala
260 Mountain Road
Drums, PA 18222
victoria.butala@gmail.com
Pro Se

Respectfully submitted,

Counsel for:
Darryl A. Lawrence
Consumer Advocate

Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
717-783-5048

Dated: July 8, 2026

/s/ Jacob Guthrie
Jacob Guthrie, PA Attorney I.D. # 334367
Assistant Consumer Advocate

Melanie Joy El Atieh, PA Attorney I.D. #209323
Deputy Consumer Advocate

Josiah B. Harmar, PA Attorney I.D. # 338426
Assistant Consumer Advocate

Email: OCASugarloaf2026@paoca.org

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities :
Corporation filed Pursuant to 52 Pa. Code :
Chapter 57 Subchapter G, for Approval to (1) : Docket No. A-2026-3061547
Bifurcate and Rebuild 4.4 Miles of the :
Existing Sunbury-Susquehanna #1 230 kV :
Transmission Line; (2) Construct 0.9 Miles of :
New Transmission Line Tap for Future 230 :
kV Double-Circuit Operation; (3) Raise :
Approximately 0.5 Miles of the Sunbury- :
Susquehanna 500 kV Transmission Line; and :
(4) Construct 11.2 Miles of New Double- :
Circuit 230 kV Transmission Line for Future :
Double-Circuit 500 kV Capacity, Located in :
Black Creek, Hazle, Hollenback, Nescopeck, :
and Sugarloaf Townships in Luzerne County, :
Pennsylvania :

Application of PPL Electric Utilities :
Corporation under 15 Pa.C.S. § 1511(c) for a :
Finding and Determination that the Service to : Docket Nos. A-2026-3061549 *et al*
Be Furnished by the Applicant Through Its :
Proposed Exercise of the Power Of Eminent :
Domain to Acquire Certain Portions of Lands :
in Black Creek, Hazle, Hollenback, :
Nescopeck, and/or Sugarloaf Townships, :
Luzerne County, Pennsylvania for the :
Sugarloaf 500/230 kV Transmission Line :
Associated with the Proposed Sugarloaf :
500/230 kV Transmission Line Project Is :
Necessary or Proper for the Service, :
Accommodation, Convenience, or Safety of :
the Public :

Petition of PPL Electric Utilities Corporation :
for Findings that a Structure to Shelter :
Electrical and Control Equipment at the : Docket No. P-2026-3061609
Proposed Nescopeck Switchyard in :
Nescopeck Township, Luzerne County, :
Pennsylvania is Reasonably Necessary for the :
Convenience or Welfare of the Public :

PREHEARING MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to the Prehearing Conference Order issued on June 24, 2026 in the above-captioned proceeding by Administrative Law Judges (ALJs) Emily A. Farren and Steven K. Haas, of the Office of Administrative Law Judge (OALJ) of the Pennsylvania Public Utility Commission (Commission), Section 333 of the Public Utility Code,¹ and the Commission's regulations,² the Office of Consumer Advocate (OCA) submits the following Prehearing Conference Memorandum:

I. BACKGROUND

On April 7, 2026, PPL submitted a transmission line siting application requesting approval to (1) bifurcate and rebuild 4.4 miles of the existing Sunbury-Susquehanna #1 230 kV transmission line; (2) construct 0.9 miles of new transmission line tap for future 230 kV double-circuit operation; (3) raise approximately 0.5 miles of the Sunbury-Susquehanna 500 kV transmission line; and (4) construct 11.2 miles of new double-circuit 230 kV transmission line for future double-circuit 500 kV capacity, located in Black Creek, Hazle, Hollenback, Nescopeck, and Sugarloaf Townships in Luzerne County, Pennsylvania (Phase 2 Application). The Phase 2 Application is docketed at A-2026-3061547 and is associated with a number of dockets which include applications for Commission authorization for PPL to exercise eminent domain and a zoning

¹ 66 Pa.C.S. § 333.

² 52 Pa. Code §§ 5.221–5.224.

petition.³ In the Phase 2 Application, PPL requested that the Application, as well as the associated condemnation application and zoning petition dockets be consolidated for purposes of hearings and, if necessary, decision.⁴

On April 22, 2026, the Commission issued a Secretarial Letter at the Phase 2 Application docket which enclosed (1) a Notice to be Published, providing that the Phase 2 Application and associated applications and petition would be published in the Pennsylvania Bulletin on May 2, 2026, and establishing a deadline for submission of protests and petitions to intervene of July 3, 2026, and (2) a Telephonic Prehearing Conference Notice, indicating that ALJs Haas and Farren are presiding over the Phase 2 Application proceeding and setting a telephonic prehearing conference date of July 10, 2026, at 10:00 AM.

On May 7, 2027, the OCA submitted a Protest and Public Statement to the Phase 2 Application. Also on May 7, 2027, the OCA filed a Motion for Consolidation of the Phase 2 Application and associated dockets with the Letter of Notification proceeding docketed at A-2025-3059443.

On May 20, 2026, Erika Cook, *pro se*, filed a Motion to Deny the Applications and Petition Without Prejudice regarding the Phase 2 Application and related dockets as well as the Letter of Notification proceeding docketed at A-2025-3059443.

On June 1, 2026, PPL filed its Answer to the OCA's Motion for Consolidation.

³ These docket numbers include: P-2026-3061609, A-2026-3061549, A-2026-3061550, A-2026-3061551, A-2026-3061552, A-2026-3061553, A-2026-3061554, A-2026-3061555, A-2026-3061556, A-2026-3061557, A-2026-3061560, A-2026-3061561, A-2026-3061562, A-2026-3061564, A-2026-3061566, A-2026-3061567, A-2026-3061568, A-2026-3061569, A-2026-3061570, A-2026-3061571, A-2026-3061572, A-2026-3061573, A-2026-3061576, A-2026-3061577, A-2026-3061578, A-2026-3061579, A-2026-3061581, A-2026-3061582, A-2026-3061583, A-2026-3061584, A-2026-3061585.

⁴ Phase 2 Application ¶ 138.

On June 2, 2026, a Notice of Appearance was filed by counsel for John Zola, Jill Zola, Richard Caputo, and Bridget Caputo. On June 12, 2026, a Protest was filed by John Zola, Jill Zola, Richard Caputo, and Bridget Caputo.

Also on June 12, 2026, Pennsylvania Representatives Dane Watro, Jamie Walsh, and Joanne Stehr filed a Letter with the Commission regarding the Phase 2 Application.

On June 18, 2026, a Telephonic Prehearing Conference Notice was reissued, setting a telephonic prehearing conference date of July 10, 2026, at 10:00 AM.

On June 24, 2026, the ALJs issued an order denying the OCA's Motion for Consolidation. Also on June 24, 2026, the ALJs issued an order denying Ms. Cook's Motion to Deny the Applications and Petition Without Prejudice. In addition, on June 24, 2026, ALJs Farren and Haas issued a Prehearing Order establishing a Prehearing Conference on Friday, July 10, 2026 at 10:00 a.m. ALJs Farren and Haas set a deadline for the prehearing memoranda on or before Wednesday, July 8, 2026.

On June 30, 2026, a Notice of Appearance was filed by counsel for Robert J. Pope. On July 1, 2026, Michael F. Dunleavy filed a Protest. On July 2, 2026, William and Cynthia Tressler, Mark Clark, Michael and Deena Bereznak, Jill Groce, Erika and Anthony Cook, John and Melissa Kramer, Jason and Melissa Ritz, Wendy Larock and Patricia Kisenwhether, Robert Pope, Sugar Maple Trails LLC, Erik and Tiffany Sharkey, and Paul and Mary Malone filed Protests; a Notice of Appearance on behalf of these Protestants was filed simultaneously with the Protests. Also on July 2, 2026, Victoria and Joel Butala filed a Protest.

Pursuant to the June 24, 2026, Prehearing Order, the OCA now files the instant Prehearing Memorandum.

II. SERVICE ON THE OCA

Deputy Consumer Advocate Melanie Joy El Atieh and Assistant Consumer Advocates Jacob Guthrie and Josiah B. Harmar represent the OCA in this proceeding. Parties should serve a total of two copies of all documents on the OCA as follows:

Jacob Guthrie
Melanie Joy El Atieh
Josiah B. Harmar
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Telephone: (717) 783-5048
Email: OCASugarloaf2026@paoca.org

For the purposes of the Prehearing Conference, Jacob Guthrie will be the primary attorney speaking on behalf of the OCA.

III. DISCOVERY

In conjunction with its proposed schedule, the OCA proposes the following modifications to the Commission's procedural rules regarding discovery. The OCA requests that the Presiding Officers direct that the modifications will take effect when addressed during the on the record prehearing conference and apply to all future discovery requests served on and after the date of the prehearing conference Friday, July 10, 2026 at 10:00 a.m.

- A. Answers to written interrogatories and requests for document production, entry for inspection, or other purposes shall be served in-hand within ten (10) calendar days of service.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within three (3) calendar days of service of the interrogatories; unresolved objections shall be served in writing to the propounding party within five (5) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within five (5) business days of service of written objections.

- D. Answers to motions to dismiss objections and/or answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admissions will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) calendar days of service.
- F. Answers to on-the-record data requests shall be served in-hand within five (5) calendar days of the requests.
- G. Any discovery or discovery-related pleadings (such as objections, motions, and answers to same) served after served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day before a holiday will be deemed to have been served on the next business day for purposes of calculating the due date for any responsive filing.

IV. PROPOSED SCHEDULE

The OCA proposes the following schedule:

Event	Date
Other Parties' Direct Testimony	Friday, October 16, 2026
Rebuttal Testimony	Tuesday, December 15, 2026
Surrebuttal Testimony	Friday, February 12, 2027
Written Rejoinder Testimony	Thursday, February 25, 2027
Hearings	Tuesday, March 9, 2027 – Friday, March 11, 2027
Main Brief	Friday, April 9, 2027
Reply Brief	Friday, April 30, 2027

The OCA reserves the right to request a separate, supplemental direct testimony filing date for purposes of addressing matters raised at public input hearings or site visits. The OCA submits that public input hearings or site visits convened fewer than 10 days before the Other Parties' Direct Testimony filing deadline will require a supplemental direct testimony filing date be established.

V. WITNESSES

The OCA intends to present direct, rebuttal, and surrebuttal testimony of expert witnesses, as may be necessary. The OCA's witnesses will present testimony in written form and will also attach various exhibits, documents, and explanatory information which will bolster the OCA's case. To expedite this proceeding's resolution, the OCA requests that copies of all interrogatories, testimony, and answers to interrogatories be mailed directly to its expert witnesses in this case, as well as to counsel for the OCA. The OCA's expert witnesses in this proceeding include:

Energy policy, large loads,
and resource adequacy

Dr. Frank Felder
Independent Electricity Consultants, LLC
1855 Saint Francis Street, Apt. 1612
Reston, VA 20190
OCASugarloaf2026@paoca.org

Transmission line planning
and design

Mr. Rao Konidena
CEO, Rakon Energy LLC
Roseville, MN 55113
OCASugarloaf2026@paoca.org

Transmission line routing

Mr. Brian Andrews
16690 Swingley Ridge Road
Suite Number 140
Chesterfield, MO 63017
OCASugarloaf2026@paoca.org

The OCA specifically reserves the right to call additional witnesses, as necessary. As soon as the OCA has determined whether an additional witness or witnesses will be necessary for any portion of its case, all parties of record will be notified.

VI. ISSUES AND EVIDENCE

PPL requests to build a \$118.5 million project.⁵ PPL states that it plans to allocate this cost across all PPL Electric customers.⁶ PPL also notes a list of factors that could drive up the cost of the Project over time.⁷ PPL stated that one new customer's needs, alone, will be sufficient to require the construction of the proposed facilities, in addition to other customers with a combined requested load of approximately 5,000 megawatts (MW).⁸

Based upon a preliminary analysis of the Phase 2 Application, the OCA has compiled a list of issues and sub-issues which it anticipates will be included in its investigation. The OCA anticipates that other issues may arise and may be pursued once the answers to all the OCA's interrogatories have been received and analyzed.

The OCA will analyze and present issues and sub-issues set forth below, and others that may develop during discovery, as appropriate with the assistance of its expert witnesses. The OCA intends to investigate:

1. Need for the Project
 - a. PPL's current load in the area proximate to the proposed rights of way.
 - b. The difference between what PPL would build in terms of transmission investment to serve existing load versus new load in the area.
 - c. The increase in transmission line capacity and what portion of the additional capacity will be occupied by the new large load customer's anticipated demand.
 - d. The engineering characteristics of the Project, such as voltage, power flows, grid-protective equipment, meters, sensors, integration with remote systems, mechanisms to prevent or inhibit the load from tripping offline, adequate cybersecurity protections.
 - e. The sizing and design of the proposed switchyard.

⁵ Phase 2 Application at ES-3.

⁶ *Id.*

⁷ *Id.* at n.1.

⁸ Phase 2 Application ¶¶ 21-23.

- f. The effects of the proposed project on upstream and downstream customer reliability.
- g. Any other system harms or benefits which might result from PPL's proposed Project described in the LON.

2. Costs

- a. The rate impacts upon PPL transmission ratepayers.
- b. The effects of the load that PPL proposes to interconnect on the PJM energy and capacity markets.
- c. The extent to which the Project is the most cost-effective solution to the alleged need.

3. Alternatives

- a. Whether reasonable alternative project designs and configurations exist and the comparative costs and benefits of those designs and configurations.

4. Environmental and Land Use Impacts

- a. Whether the environmental and land use impacts of the project are consistent with the requirements of Art. I, Section 27 of the Pennsylvania Constitution.
- b. Whether the proposed and/or alternative transmission line routes included in the Phase 2 Application are appropriate and can be selected consistent with the requirements of the Public Utility and Eminent Domain Codes.

5. Which elements of the Project fall within federal jurisdiction, state jurisdiction, or overlapping federal and state jurisdiction.

6. What PPL's definitions of "transmission" and "distribution" are for purposes of this Project, and how those map onto state and federal law, including the Federal Energy Regulatory Commission's seven-factor test for federal-jurisdictional transmission facilities serving retail loads.⁹

⁹ See *Cal. Pac. Elec. Co.*, 133 FERC ¶ 61,018, at PP 46-48 (2010). In the context of Order No. 888, FERC adopted a "7-factor" test:

- (1) local distribution facilities are normally close in proximity to retail customers
- (2) local distribution facilities are primarily radial in character
- (3) power flows into local distribution systems; it rarely, if ever, flows out
- (4) when power enters a local distribution system, it is not re-consigned or transported on to some other market
- (5) power entering a local distribution system is consumed in a comparatively restricted geographic area
- (6) meters are based at the transmission/local distribution interface to measure flows into the local distribution system

7. By what legal mechanisms PPL proposes to allocate the state-jurisdictional distribution costs and federal-jurisdictional transmission costs.

8. Whether PPL's proposed method of cost allocation, as PPL claimed to justify the need for this project, "will ultimately reduce the transmission rates charged by PPL Electric to its other transmission level customers."¹⁰

9. Whether PPL's justification for need, that the project "will ultimately reduce the transmission rates charged by PPL Electric to its other transmission level customers," includes Phase I, Phase II, and any other planned phases of the Project.

10. How the Project's Phases impact need, service quality, cost allocation, load and ramping schedules, and other variables essential to the Commission's evaluation.

11. The interrelation between Phases I and II of the Project, to what extent Phase I of the project can be assessed and approved in isolation from Phase II, and whether Phase I of the project will be sufficient from a service quality perspective to address the identified need without consideration of Phase II.

12. According to which information, assumptions, and methods PPL calculates PPL's asserted public transmission rate reduction.

13. At what point in the development of the Project the public will realize PPL's asserted public transmission rate reduction.

15. Whether the new large load that PPL proposes to serve via this Project plans to bring its own new generation or capacity; rely on the backstop auction that PJM Interconnection, L.L.C. is currently formulating; or receive transmission through a connect-and-manage framework.¹¹

16. Whether PPL is adequately ensuring that the new large load customers that PPL proposes to serve using the facilities subject to the Phase 2 Application will receive sufficient electricity at locations and in amounts which are adequate to meet the customers' needs and maintain adequacy and reliability of service for all of its customers with the addition of these new customers.¹²

(7) local distribution systems will be of reduced voltage.

¹⁰ Phase 2 Application ¶ 28.

¹¹ See *Statement of Principles Regarding PJM*, THE WHITE HOUSE (Jan. 16, 2026), <https://www.energy.gov/documents/statement-principles-regarding-pjm>; *Board Decisional Letter on Critical Issue Fast Path – Large Load Additions*, PJM (Jan. 16, 2026), <https://www.pjm.com/-/media/DotCom/about-pjm/who-we-are/public-disclosures/2026/20260116-pjm-board-letter-re-results-of-the-cifp-process-large-load-additions.pdf>.

¹² 66 Pa. C.S. §§ 1501, 2807(a); see also 66 Pa. C.S. § 2803 (defining "reliability" to "include[] adequacy and security," where "adequacy" "means the provision of sufficient generation, transmission and distribution capacity so as to supply the aggregate electric power and energy requirements of consumers, taking into account scheduled and unscheduled outages of system facilities").

17. Whether the new large load customers' agreements with PPL will need to be updated pursuant to any Commission-approved tariff schedules that results from PPL's recent rate case settlement at R-2025-3057164.¹³

18. Whether the entity responsible for the new large loads that PPL proposes to serve via this Project have signed the White House's Ratepayer Protection Pledge (Pledge).

19. Whether the entity's agreements with PPL related to this Project effectuate that Pledge, including (1) "Building, Bringing, or Buying New Power Supply," (2) "Paying for New Power Delivery Infrastructure Upgrades," (3) "Paying Whether They Use the Power or Not," (4) "Investing in Local Job Creation and Workforce Development," and (5) "Contributing to Electric and Community Resilience."¹⁴

20. Whether PPL provided sufficient customer education regarding the Phase 2 Application, the conduct of PPL's agents and assigns in attempting to survey and negotiate purchase of the proposed rights of way, and whether PPL's interactions with landowners are consistent with the requirements of the Public Utility Code and Commission's regulations.

21. All other matters necessary to ensure that approval of the Phase 2 Application is necessary or proper for the accommodation, convenience, and safety of the public; PPL's service and facilities are and will be adequate, efficient, safe, reasonable, reliable, and non-discriminatory; and that approval of the Phase 2 Application is otherwise consistent with the Public Utility Code and PPL's obligations thereunder.

VII. PUBLIC INPUT HEARINGS AND SITE VISITS

The OCA will be prepared to discuss public input hearings at the prehearing conference. Notably, in the recent and related Letter of Notification proceeding docketed at A-2025-3059443, approximately 34 witnesses testified at the two public input hearings, one afternoon and one evening, held on June 30, 2026. The OCA anticipates that a greater level of public engagement should be anticipated regarding the Phase 2 Application. Therefore, the OCA respectfully requests that the Commission convene two public input hearings in Black Creek, Hazle, Hollenback, Nescopeck, or Sugarloaf Townships, one afternoon and one evening, as well as two telephonic

¹³ *Pa. PUC v. PPL Electric Utils. Corp.*, Docket No. R-2025-3057164, Order (Aug. 11, 2026).

¹⁴ *Ratepayer Protection Pledge, The White House* (Mar. 4, 2026), <https://www.whitehouse.gov/articles/2026/03/ratepayer-protection-pledge/>; see also *See Tom Dotan, The AI Data Center Boom Is a Job-Creation Bust*, WALL ST. J. (Feb. 25, 2025 at 21:00 ET), <https://www.wsj.com/tech/ai-data-center-job-creation-48038b67> (reporting on and correcting vastly overstated AI data center job creation claims).

public input hearings, one afternoon and one evening. The OCA will be prepared to discuss dates and venues for public input hearings at the prehearing conference.

Further, the OCA requests that the Protestants who are affected landowners and other affected landowners be given the opportunity to request site visits along the portions of their property which are traversed by the proposed right of way. At this time, the OCA has not received any specific requests for site visits, but will inform the ALJs and parties if such requests are made.

VIII. SETTLEMENT

The OCA is willing to engage in settlement discussions with PPL, Protestants, and any other future Parties to this matter at the appropriate time.

Respectfully submitted,

Counsel for:
Darryl A. Lawrence
Consumer Advocate

/s/Jacob Guthrie
Jacob Guthrie, PA Attorney I.D. # 334367
Assistant Consumer Advocate

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
(717) 783-5048

Melanie Joy El Atieh, PA Attorney I.D. # 209323
Deputy Consumer Advocate

Josiah B. Harmar, PA Attorney I.D. # 338426
Assistant Consumer Advocate

DATED: July 8, 2026

Email: OCASugarloaf2026@paoca.org