PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17120

Public Meeting held August 27, 2026

Commissioners Present:

Stephen M. DeFrank, Chairman
Kimberly Barrow, Vice Chair
Kathryn L. Zerfuss
John F. Coleman, Jr.
Ralph V. Yanora

Pennsylvania Public Utility Commission	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 Coalition for Community Solar Access	C-2025-3058251
Rik Bhattacharyya	C-2025-3058846
Safiyah 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
Mary Bainbridge	C-2026-3061424
Diane Cheer	C-2026-3061706

v.

PPL Electric Utilities Corporation

OPINION AND ORDER

BY THE COMMISSION:

Before the Pennsylvania Public Utility Commission (Commission) for consideration and disposition is the Petition for Reconsideration and Clarification filed by the Customer-Generator Coalition (CGC)[1] on June 26, 2026, seeking reconsideration of the Commission's Opinion and Order entered on June 11, 2026 (*June 2026 Order*), relative to the above-captioned proceeding (CGC Petition or CGC's Petition). On July 6, 2026, PPL Electric Utilities Corporation (PPL) filed an Answer to CGC's Petition (PPL Answer to CGC Petition), and the Office of Consumer Advocate (OCA) filed a Letter in Lieu of Answer in opposition to CGC's Petition (OCA Letter in Lieu of Answer).

In its Petition, CGC requests that the Commission reconsider and clarify portions of its *June 2026 Order* approving the Maximum Registered Peak Load (MRPL)

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[1] The CGC consists of Aspen Power Partners LLC, 38 Degrees North, Bollinger Solar, CEP Renewables, LLC, CVE North America, 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, and Syncarpha Capital, LLC.

provisions of the Non-Unanimous Settlement reached in this proceeding,[2] as modified. Specifically, CGC argues that the Commission erred by permitting PPL's tariff to incorporate exported generation into the MRPL calculation, allegedly allowing a tariff to alter the application of a Commission Regulation. CGC also requests clarification regarding whether the Commission's decision changes the legal significance of customer-generator status under the Alternative Energy Portfolio Standards Act of 2004, Act of November 30, 2004, P.L. 1672, *as amended*, 73 Pa.C.S. §§ 1648.1-1648.8 and 66 Pa.C.S. § 2814 (AEPS Act), whether the approval of MRPL is limited to the facts of this case or establishes broader precedent, and whether future consideration of these issues should occur through rulemaking rather than adjudication. Upon review, we shall deny CGC's Petition, consistent with this Opinion and Order.

I. History of the Proceeding

On September 30, 2025, PPL filed proposed Original Tariff Electric – Pa. P.U.C. No. 202 (Retail Tariff)[3] and Original Tariff Electric – Pa. P.U.C. No. 2S

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[2] The Joint Petition for Approval of Non-Unanimous Settlement of All Issues (Joint Petition or Settlement), was filed by PPL, the Commission's Bureau of Investigation and Enforcement (I&E), the 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), Convergent Energy and Power LP (Convergent), Dimension PA 1 LLC (Dimension), the U.S. Department of Defense and all other Federal Executive Agencies (DOD/FEA), the Environmental Intervenors (EI or Environmental Intervenors), the Energy Justice Advocates (EJA), the Joint Solar Advocates (JSA), PP&L Industrial Customer Alliance (PPLICA), the Retail Energy Supply Association (RESA), the Sustainable Energy Fund (SEF), Walmart Inc. (Walmart), and Mr. Eric Joseph Epstein (collectively, the Joint Petitioners) on March 13, 2026. The Environmental Intervenors consist of the Environmental Defense Fund (EDF), the Natural Resources Defense Council (NRDC), and Citizens for Pennsylvania's Future (PennFuture). The JSA consist of the Coalition for Community Solar Access and the Solar Energy Industries Association.

[3] PPL's proposed Retail Tariff was set forth in PPL Exhibit GEO-1.

(Supplier Tariff),[4] containing proposed changes in rates, rules, and regulations calculated to produce approximately $356.27 million in additional annual revenues, to become effective December 1, 2025.

Subsequently, the OCA, the OSBA, CAUSE-PA, Convergent, the JSA, PPLICA, and several *pro se* customers of PPL filed Formal Complaints against the Company's requested increase, as docketed above. In addition, the following Parties filed petitions to intervene: CEO, Dimension, DOD/FEA, EI, EJA, the JSA, SEF, Walmart, IGS, CGC, the Professional Dairy Managers of Pennsylvania (PDMP), and Mr. Epstein.

By Order entered on October 23, 2025 (*October 2025 Order*), the Commission instituted an investigation into the lawfulness, justness, and reasonableness of the proposed rate increase. Pursuant to Section 1308(d) of the Public Utility Code (Code), 66 Pa.C.S. § 1308(d), PPL's proposed Retail Tariff and its proposed Supplier Tariff were suspended by operation of law until July 1, 2026, unless permitted by Commission Order to become effective at an earlier date. In addition, the Commission ordered that the investigation include consideration of the lawfulness, justness, and reasonableness of PPL's existing rates, rules, and regulations. This matter was assigned to the Office of Administrative Law Judge (OALJ) for the prompt scheduling of hearings culminating in the issuance of a Recommended Decision.

Also on October 23, 2025, Vice Chair Kimberly Barrow issued a Statement regarding the *October 2025 Order* (Vice Chair Barrow Statement) urging the Parties to this proceeding to "take a critical look at, *inter alia*," the issues of: (1) the extended stay-out period between *Pa. PUC v. PPL Electric Utilities Corporation*, Docket Nos. R-2015-2469275, *et al.* (Opinion and Order entered November 19, 2015)

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[4] PPL's proposed Supplier Tariff was set forth in PPL Exhibit LN-1.

(*PPL 2015 Rate Case*) and this instant proceeding; (2) the Company's capital structure; (3) tracking capital from PPL's parent company; (4) customer service issues and the impact on PPL's requested return on equity (ROE); (5) cost allocation; and (6) universal service. *See* Vice Chair Barrow Statement at 1-3. By Prehearing Order issued on November 14, 2025 (Prehearing Order), the ALJs advised the Parties to this proceeding of the need to address the above issues. *See* Prehearing Order at 8, ¶ 11.

In accordance with the *October 2025 Order*, this matter was assigned to Deputy Chief Administrative Law Judge Christopher P. Pell and Administrative Law Judge Barbara Shadie Nause (collectively, the ALJs).

On November 5, 2025, a prehearing conference was held. The following Parties were present and represented by counsel: PPL, I&E, the OCA, the OSBA, CAUSE-PA, CEO, Convergent, Dimension, DOD/FEA, EI, EJA, the JSA, PPLICA, RESA, SEF, Walmart, IGS, CGC, and PDMP. Additionally, Mr. Epstein appeared, *pro se*. R.D. at 4.

On November 17, 2025, the Commission issued a public input hearing notice for a series of six public input hearings to be held, as follows:

- December 8, 2025 – one in-person public input hearing in Scranton, PA;
- December 9, 2025 – one in-person public input hearing in Catasauqua, PA;
- December 10, 2025 – one in-person public input hearing in Harrisburg, PA;
- December 11, 2025 – one in-person public input hearing in Lancaster, PA; and
- December 15, 2025 – two telephonic public input hearings.

R.D. at 4.

On December 4, 2025, the Commission issued a second public input hearing notice reflecting the addition of an evening public input hearing on December 18, 2025 in Wilkes Barre, PA. R.D. at 4.

The public input hearings were held as scheduled. A total of 97 people testified during the public input hearings. R.D. at 5.

On February 14, 2026, PPL filed a Motion to Sever the MRPL issue from this rate proceeding (Motion to Sever). Due to the evidentiary hearings that were scheduled to commence on February 17, 2026, PPL requested an expedited answer deadline of February 15, 2026. R.D. at 5.

Accordingly, by electronic mail (email) issued to the Parties on February 14, 2026, the ALJs advised the active Parties to this proceeding that answers to PPL's Motion to Sever were due by 3:00 p.m. on February 15, 2026. Answers were submitted by the OCA, the OSBA, CAUSE-PA, the JSA, Walmart, CGC, and PDMP. R.D. at 5-6.

By email issued to the Parties on February 16, 2026, the ALJs advised the Parties that the ALJs would hear brief oral argument from interested Parties on the Motion to Sever the MRPL from this rate proceeding, at the outset of the hearing scheduled for February 17, 2026, and that the ALJs would address the Motion to Sever following oral argument. R.D. at 6.

On February 17, 2026, the evidentiary hearing commenced. The following Parties were present: PPL, I&E, the OCA, the OSBA, CAUSE-PA, CEO, Convergent, Dimension, EI, EJA, the JSA, PPLICA, RESA, SEF, Walmart, IGS, CGC, and PDMP. R.D. at 6.

During the hearing, PPL made its witness, Mr. Joseph Lookup, available for cross-examination. The OCA made its witness, Mr. Matthew Hoyt, available for cross-examination. All other party witnesses were excused from appearing at the hearing since no Parties requested to cross-examine them, and also because the ALJs did not have any questions for them. PPL, I&E, the OCA, the OSBA, CAUSE-PA, CEO, Convergent, EI, EJA, PPLICA, RESA, SEF, Walmart, IGS, and CGC each moved to have their witnesses' testimonies and exhibits admitted into the record. As there were no objections, all Parties' testimony and exhibits were admitted into the record during the hearing. R.D. at 6-7.

On March 5, 2026, a Joint Stipulation and Settlement of PPL and the JSA (Joint Stipulation) was filed regarding the MRPL issue.[5] R.D. at 8.

On March 9, 2026, by agreement and request of the Parties, and with approval of the Commission, a second day of the evidentiary hearing was held telephonically. The following parties were present: PPL, the OCA, the OSBA, CAUSE-PA, CEO, Dimension, the JSA, Walmart, CGC, and PDMP. During the hearing, PPL made its witness, Mr. Andrew Castanaro available for cross-examination. Additionally, CGC made its witness, Mr. Guy Sharfman, available for cross-examination and PDMP made its witness, Mr. James Harbach, available for cross-examination. All other Party witnesses were excused from appearing at the hearing since no Parties requested to cross-examine them, and also because the ALJs did not have any questions for them. PPL, the OCA, the OSBA, the JSA, Walmart, CGC, and PDMP each moved to have their witnesses' testimonies and exhibits regarding the MRPL issue admitted into

[5] This Joint Stipulation has been incorporated into the Joint Petition. *See* Joint Petition at ¶¶ 98-105; PPL Statement in Support at 64.

the record. As there were no objections, these Parties' remaining testimony and exhibits were admitted into the record. R.D. at 7.[6]

On March 13, 2026, the Joint Petitioners filed the Joint Petition. The only active Parties who opposed any aspect of the Settlement were CGC and PDMP. Each of these Parties' opposition was limited to the provisions of the Settlement regarding the MRPL issue. Additionally, IGS took a position of non-opposition regarding the entirety of the Settlement. Further, none of the *pro se* Formal Complainants have submitted any response regarding the Settlement. R.D. at 8.

On March 20, 2026, sixteen of the seventeen Joint Petitioners filed a Statement in Support of the Settlement (Statement in Support). *See* R.D. at 8.[7]

Also on March 20, 2026, CGC and PDMP each filed a Statement in Opposition to the Settlement (Statement in Opposition), outlining their opposition regarding the MRPL issue contained in the Settlement. R.D. at 8.

On April 1, 2026, the Joint Petitioners filed Amended Appendix C to the Joint Petition, regarding Bill Impacts to the Joint Petition. R.D. at 9.

On April 17, 2026, the Commission issued the Recommended Decision of ALJs Pell and Nause. Therein, the ALJs recommended that the Commission approve the

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[6] The eighteen-page Appendix attached to the Recommended Decision contains a complete list of all admitted testimony and exhibits admitted during the evidentiary hearings held on February 17, 2026 and March 9, 2026. R.D. at 8.

[7] Although the ALJs stated on page 8 of the Recommended Decision that DOD/FEA filed a Statement in Support on March 20, 2026, our review of the Commission's Case Management System indicates that, to date, no Statement in Support has been filed by DOD/FEA.

Joint Petition, without modification, finding it to be in the public interest, consistent with the Code, and supported by substantial evidence. R.D. at 1.

CGC filed Exceptions to the Recommended Decision on April 27, 2026. PPL, the OCA, and the OSBA each filed Replies to Exceptions on May 4, 2026.

In our *June 2026 Order*, we: (1) denied the Exceptions filed by CGC; (2) adopted the Recommended Decision of the ALJs, as modified; and (3) granted the Joint Petition and approved the Settlement, as modified.

As noted, *supra*, on June 26, 2026, CGC filed its Petition seeking reconsideration of the *June 2026 Order*. On July 6, 2026, PPL filed an Answer to the CGC Petition, and the OCA filed a Letter in Lieu of Answer in opposition to CGC's Petition.

By Opinion and Order entered July 8, 2026, the Commission granted reconsideration of the *June 2026 Order* as to the CGC Petition pending further review of, and consideration on, the merits, pursuant to Pa. R.A.P. 1701(b)(3).

II. Discussion

A. Legal Standards

With respect to petitions for rehearing, reconsideration, rescission, and amendment of Commission orders, the Code establishes a party's right to seek relief within fifteen days following the service of a Commission order pursuant to

Subsection 703(f). 66 Pa.C.S. § 703(f) (relating to rehearing).[8] Upon the filing of a petition for relief pursuant to Section 703(f), the Commission may affirm, rescind, or modify its original order. 66 Pa.C.S. § 703(f). The Code further provides that the Commission may, at any time, after notice and opportunity to be heard by all affected parties, rescind or amend any order made by the Commission, pursuant to Section 703(g). 66 Pa.C.S. § 703(g) (relating to rescission and amendment of orders). A request for relief pursuant to § 703(f) or § 703(g) must be brought as a petition for relief consistent with Section 5.572 of Commission Regulations. 52 Pa. Code § 5.572 (relating to petitions for relief).

Petitions for relief predicated upon Sections 703(f) and 703(g) of the Code, whether brought under Section 5.572(c) of Commission Regulations as a petition for reconsideration, rehearing, reargument, clarification, supersedeas, or others within fifteen days of the service of a Commission order, or under Section 5.572(d) as a petition for rescission or amendment filed at any time following service of a Commission order, are reviewed by the Commission as matters seeking relief falling within the agency's discretion.

The Commission's application of the standard for granting a petition for amendment, reconsideration, or recission is set forth in *Philip Duick, et al. v. Pennsylvania Gas and Water Company*, 56 Pa. P.U.C. 553 (1982) (*Duick*) as follows:

> 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 on the grounds that the decision or

[8] Petitions under this section which do not allege new evidence are typically treated as petitions for reconsideration. Petitions for rehearing pursuant to Section 703(f) of the Code typically include an allegation of new evidence. 66 Pa.C.S. § 703(f); *see West Penn Power Co. v. Pa. PUC*, 659 A. 2d 1055 (Pa. Cmwlth. 1995).

> ruling of the Commission on a matter or issue was either unwise or in error.
>
> In this regard we agree with the Court in the *Pennsylvania Railroad Company* case, wherein the Court said,
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> > [b]ut the grounds for reconsideration should be restricted to the new matters and new or changed conditions set up in the joint petition, which had arisen since and were not presented in the several petitions of these appellants … and dismissed by the Commission … and not appealed from. Parties,…, cannot be permitted, by a second motion to review and reconsider, to raise the same questions which were specifically considered and decided against them and not appealed from. …
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> *Pennsylvania Railroad Co. v. Public Service Commission*, [179 A. 850, 854 (Pa. Super. 1935)].
>
> 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. Absent such matters being presented, we consider it unlikely that a party will succeed in persuading us that our initial decision on a matter or issue was either unwise or in error.

Duick at 559; *see also, AT&T v. Pa. PUC*, 568 A.2d 1362 (Pa. Cmwlth. 1990).

The Commission utilizes a two-step analysis in determining whether to exercise its discretion to grant relief under *Duick*. *See, e.g., SBG Management Services, Inc./Colonial Garden Realty Co., L.P. v. Philadelphia Gas Works*, Docket Nos. C-2012-2304183 and C-2012-2304324 (Opinion and Order entered May 9, 2019)[9] at 4-5 (discussing *Application of La Mexicana Express Service, LLC, to transport persons in*

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[9] *Affirmed, Phila. Gas Works v. Pa. PUC*, 249 A.3d 963 (Pa. 2021), *remand granted, in part,* 256 A.3d 1092 (Pa. 2021) (Table).

paratransit service, between points within Berks County, Docket No. A-2012-2329717; A-6415209 (Opinion and Order entered September 11, 2014)). The first step is to determine whether a party has offered any basis to persuade the Commission to exercise its discretion, including but not limited to, new and novel arguments or identified considerations that appear to have been overlooked or not addressed by the Commission in its previous order. This initial step examines whether a party raises the same questions which were specifically considered and decided against them by a prior Order of the Commission. If so, it is unlikely that the Commission will be persuaded to exercise its discretion to grant relief. *Duick* at 559 (citing *Pennsylvania Railroad Co. v. Public Service Commission*, 179 A. 850 (Pa. Super. 1935)). The second step of the *Duick* analysis is to evaluate any matter the Commission has deemed worthy of consideration, to determine whether to grant any relief.

B. *June 2026 Order*

In the *June 2026 Order*, the Commission denied CGC's Exceptions, adopted the Recommended Decision of ALJs Pell and Nause, as modified, and approved the Joint Petition, as modified. Upon review, we agreed with the ALJs and the Joint Petitioners that the Settlement was in the public interest and was supported by substantial evidence in the record. Pursuant to the Settlement, we approved an annual revenue increase for PPL of $275 million, or 27.3% over present base rate electric distribution revenues, based on the fully projected future test year (FPFTY) ending June 30, 2027, in lieu of the Company's originally requested increase of approximately $356.27 million, or 35.6%. *June 2026 Order* at 2-4.

The Settlement approved by the Commission resolved a broad range of rate case issues. We described the Settlement as addressing revenue requirement, revenue allocation, rate design, PPL's Distribution System Improvement Charge (DSIC), PPL's Storm Damage Expense Rider, customer service and low-income issues, vegetation management, reliability, large-load interconnections, MRPL, the Electric Vehicle (EV) Time-of-use (TOU) Charging Rebate Program and Direct Current Fast Charger (DCFC) rate, information technology (IT) upgrades, PPL's retail and supplier tariffs, and behind-the-meter non-exporting battery energy storage systems. The Settlement also included appendices for proof of revenues, revenue allocation, bill impacts, proposed findings of fact, proposed conclusions of law, proposed ordering paragraphs, compliance retail tariff modifications, and the grandfathered megawatt (MW) cap allocation process. *June 2026 Order* at 18-20.

On the MRPL issue,[10] the Commission generally accepted the ALJs' conclusion that PPL's MRPL proposal, as modified by the Settlement, should be approved rather than the positions advanced by CGC and PDMP. We explained that PPL's MRPL proposal was directed at "no-load" or minimal-load net-metering installations that may have generation capacities above 1 MW and up to 3 MW, consume little or no electricity from the grid, and export significant excess generation. We summarized the key concern as the existing 100 kilowatt (kW) demand-based

[10] The MRPL issue arose from PPL's proposal to modify the manner in which default service customers are assigned to Generation Supply Charge (GSC) rate classes. Under PPL's proposal, customers would be classified based on their "net demand contribution impact" to PPL's default service procurement, as determined by the net power flow from or into PPL's distribution system, rather than solely on traditional peak demand. PPL asserted that the proposal was necessary because certain "no-load" or minimal-load customer-generators with large generation facilities export substantial quantities of electricity to the grid while remaining classified in the small Commercial and Industrial (C&I) GSC-1 default service class, thereby increasing net-metering cash-out costs borne by other GSC-1 default service customers. The Settlement modified the proposal by providing grandfathering protections for certain existing and near-term customer-generators and enhancing rate class GSC-2 compensation. The ALJs recommended approval of the MRPL provisions, and the Commission ultimately approved the Settlement, as modified to exempt certain agricultural customer-generators utilizing anaerobic digesters and biogas generation systems. *See June 2026 Order* at 128-63, 187-202 (describing PPL's MRPL proposal, the Settlement modifications, the Parties' positions, the Commission's approval of the MRPL provisions, and the agricultural customer-generator exemption).

GSC-1/GSC-2 classification structure allowing large export-focused customer-generators to remain in the small C&I GSC-1 class because they have little or no net demand, while their excess generation cash-out costs are recovered from default-service customers in that same class. We also noted the ALJs' reliance on PPL's evidence that annual net-metering cash-outs for the small C&I class were approximately $11 million as of March 31, 2025, and could increase substantially under various project-completion scenarios. *June 2026 Order* at 159-60.

The *June 2026 Order* made one important modification to the Settlement's MRPL provisions: it exempted certain agricultural customer-generators from the MRPL classification adopted in Settlement Paragraphs 98 through 105. The Commission found that agricultural biogas systems using anaerobic digesters or biologically derived methane gas should not be swept into a classification designed for large "no-load" net-metering operations because the record did not establish that those agricultural operations fit the same profile. The Commission defined an agricultural customer-generator as a retail electric customer-generator whose facility is an anaerobic digester or biogas generation system fueled primarily by biologically derived methane gas at a facility on land actively used for agricultural production, owned or operated by an entity primarily engaged in animal agricultural operations, while excluding commercial off-farm biodigesters such as standalone or regional plants. *June 2026 Order* at 187-92, 223-24.

The Commission denied CGC's five Exceptions in a combined disposition, finding that they were interrelated and advanced one overarching theory: that the MRPL provisions could not lawfully be approved as a negotiated compromise because they allegedly failed the legal, evidentiary, and public-interest standards applicable to tariffed rate classifications. The Commission rejected that argument, concluding that the ALJs applied the proper standard, reviewed the MRPL record in detail, and correctly found that PPL's MRPL proposal, as modified by the Settlement, was lawful, just and reasonable, supported by substantial evidence, and consistent with Commission precedent. The Commission also found that the Settlement reasonably tempered the effect of MRPL by grandfathering certain existing and near-term customer-generators and by enhancing GSC-2 compensation through additional components, including capacity, line losses, and Gross Receipts Tax treatment. *June 2026 Order* at 192-93.

The Commission further found that the MRPL provisions are consistent with the Commission's authority to approve rate classifications reflecting customer-generators' actual impact on default service procurement and rate class cost responsibility. It concluded that PPL's proposed MRPL definition assigns default service customers to Rate GSC-1 or Rate GSC-2 based on the customer's "net demand contribution impact" to default service procurement, determined by net power flow "from or into" PPL's distribution system. The Commission relied on recent Commission and Commonwealth Court precedent, including *Petition of UGI Utilities, Inc. – Electric Division for Approval of a Default Service Plan for the Period of June 1, 2025 through May 31, 2029*, Docket Nos. P-2024-3049343, *et al*. (Opinion and Order entered February 20, 2025) (*UGI DSP V*), *Penn Renewables, LLC v. Pa. PUC*, 2026 WL 1466224 (Pa. Cmwlth. 2026) (*Penn Renewables*), and the Commission's recent Opinion and Order in Citizens' Electric Company of Lewisburg, PA's (Citizens') recent base rate proceeding, *Pa. PUC, et al. v. Citizens' Electric Company of Lewisburg, PA*, Docket Nos. R-2025-3054394, *et al*. (Opinion and Order entered January 15, 2026) (*Citizens' 2025 Rate Case*), to reject CGC's claim that the use of exported generation in classification is unlawful or unsupported. *June 2026 Order* at 168-70, 192-202.

C. CGC Petition, Answers and Disposition

1. CGC Petition and Answers

In its Petition, CGC requests that the Commission reconsider and clarify portions of its *June 2026 Order* approving the MRPL provisions of the Settlement. CGC's Petition, challenging the approved MRPL framework, characterizes the approved MRPL provisions as permitting exported generation to be incorporated into a customer's demand-based classification for default service purposes and frames the CGC Petition as raising errors of law warranting reconsideration and modification of the *June 2026 Order*. CGC Petition at 1-3.

CGC's first argument is that the Commission erred as a matter of law by permitting PPL's tariff to redefine or materially alter the application of a Commission Regulation. CGC focuses on 52 Pa. Code § 54.182, which defines MRPL as the highest level of demand for a customer based on PJM's Peak Load Contribution (PLC) standard or its equivalent, "as may be further defined by the [electric distribution company (EDC)] tariff." CGC argues that the *June 2026 Order* allowed PPL to use tariff language to "alter the application" of MRPL by incorporating exported generation but did not identify the legal principle that permits a tariff to alter an existing regulatory definition or explain the boundary between "further defining" a regulatory term and substantively modifying it. CGC Petition at 3-5.

CGC contends that the distinction between demand and exported generation is legally important. In CGC's view, Section 54.182 defines MRPL by reference to a customer's highest level of demand, and if 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. CGC argues that such a change would ordinarily require amendment of Section 54.182 through rulemaking,

rather than approval of a utility-specific tariff provision in an individual rate proceeding. CGC therefore asks the Commission to clarify whether exported generation constitutes "demand" under Section 54.182, whether PPL's approved tariff merely implements Section 54.182, or whether the Commission is relying on independent statutory authority to permit alteration of the regulatory construct embodied in Section 54.182.
CGC Petition at 6-8.

CGC's second argument is that the Commission overlooked what CGC describes as the distinct legal question presented in this case. CGC acknowledges the Commission's reliance on *UGI DSP V* and *Citizens' 2025 Rate Case* and does not argue that those proceedings are irrelevant. However, CGC maintains that those cases did not resolve the specific question presented here: whether an EDC may modify the operation of a Commission-defined regulatory metric, MRPL, through tariff language. According to CGC, *UGI DSP V* involved Supply Peak Load Impact (SPLI), and *Citizens' 2025 Rate Case* involved Billing Demand, while PPL's proposal uses the specific regulatory term MRPL. CGC therefore asks the Commission to clarify whether it intended to hold that *UGI DSP V* and *Citizens' 2025 Rate Case* resolved the MRPL regulatory-interpretation issue as a matter of law, or whether it independently determined that PPL's MRPL application is permissible under Section 54.182, notwithstanding the absence of such a holding in those prior proceedings. CGC Petition at 8-10.

CGC's third argument concerns the legal significance of customer-generator status under the AEPS Act. In this regard, CGC states that it does not dispute the Commission's general authority to establish customer classifications, evaluate cost causation principles, or approve tariff provisions governing class assignment. Rather, CGC frames the issue more narrowly: what legal and evidentiary standard governs the determination that a customer-generator should be assigned from GSC-1 to GSC-2 under the approved MRPL construct, and how does the record satisfy that standard? CGC argues that the AEPS Act establishes customer-generators as a distinct statutory category and that affected facilities remain customer-generators operating under PPL's retail tariffs and Pennsylvania's net-metering framework. CGC Petition at 10-11.

CGC further argues that the approved MRPL construct now allows export activity to affect assignment to GSC-2, whereas the historic distinction between GSC-1 and GSC-2 turned on a customer's contribution to system peak demand through PJM's PLC methodology. CGC asks the Commission to clarify the legal standard by which export activity, minimal retail load, procurement impacts, or other system effects make a customer-generator sufficiently analogous to existing large C&I customers to justify assignment to GSC-2. CGC also asks the Commission to identify whether it relied on demonstrated differences in cost responsibility, service characteristics, load characteristics, distribution-system usage, procurement impacts, or some other ratemaking factor. CGC Petition at 11-13.

CGC's fourth argument addresses the modification made by the *June 2026 Order* to the Settlement's MRPL provisions, which exempted certain agricultural anaerobic digesters and biogas facilities from the approved MRPL provisions. CGC states that it does not challenge that exemption. Instead, CGC argues that the exemption shows export activity alone is not necessarily dispositive in determining whether a customer-generator should be subject to MRPL. CGC reasons that, because the Commission exempted some customer-generators that also export electricity, the Commission must have relied on additional considerations beyond export activity, such as agricultural policy, operational characteristics, service characteristics, cost causation, statutory considerations, or some other factor. CGC Petition at 13-14.

CGC therefore asks the Commission to clarify the legal, regulatory, or evidentiary considerations underlying the modification made by the *June 2026 Order* to the Settlement's MRPL provisions and explain how those considerations are reconciled with the broader rationale supporting application of MRPL to other customer-generators. CGC emphasizes that the Commission's Regulations establish a single statutory category of customer-generator and asks the Commission to identify the legal principle that distinguishes exempt agricultural customer-generators from non-exempt customer-generators. CGC argues that this clarification is needed because the *June 2026 Order*'s modification to the MRPL provisions of the Settlement demonstrates that factors in addition to export activity may properly influence application of the MRPL construct, but the *June 2026 Order* does not identify those factors or their scope. CGC Petition at 14-15.

In conclusion, CGC asks the Commission to grant reconsideration, modify the *June 2026 Order*, and clarify four points: (1) that customer-generated exports do not constitute customer demand for purposes of Section 54.182; (2) that the approved tariff provisions do not alter customer-generators' statutory rights under the AEPS Act; (3) that approval of the tariff language does not determine that exported generation may be treated as customer demand in future proceedings; and (4) that approval of the Settlement does not foreclose future consideration of these issues through rulemaking or later adjudications. CGC also expressly preserves arguments concerning AEPS Act interpretation, consistency with Commission Regulations, unreasonable discrimination under Section 1304 of the Code, 66 Pa.C.S. § 1304, substantial evidence, and whether changes to 52 Pa. Code § 54.182 require rulemaking rather than adjudication. CGC Petition at 15-17.

In its Answer to CGC's Petition, PPL asks the Commission to deny CGC's Petition, arguing that CGC merely re-raises issues the Commission already considered and rejected in the *June 2026 Order*. According to PPL, CGC, through its Petition, repeats arguments that PPL's MRPL proposal conflicts with 52 Pa. Code § 54.182 and that *UGI DSP V* and *Citizens' 2025 Rate Case* are distinguishable; PPL argues those points do not satisfy the *Duick* reconsideration standard because they are not new or previously overlooked arguments. PPL Answer to CGC Petition at 1-2.

PPL emphasizes that CGC failed to account for the Commonwealth Court's publication of *Penn Renewables* on May 26, 2026, which PPL argues made that decision binding precedent and directly disposes of issues CGC continued to raise. PPL disputes CGC's characterization that *Penn Renewables* addressed only the AEPS Act and Section 1304[11] issues related to UGI Utilities, Inc. – Electric Division's (UGI) SPLI mechanism. PPL argues that the Commonwealth Court also addressed whether UGI could implement its methodology despite Commission Regulations, because the court recognized that UGI requested waiver of Regulations that otherwise might have prevented classification using the 100 kW threshold and SPLI mechanism, and that the Commission had authority to grant that waiver. PPL notes that, in the above-captioned proceeding, PPL likewise requested any and all waivers of Commission Regulations necessary to implement MRPL. PPL Answer to CGC Petition at 2.

PPL recounts the procedural background of the case to show that the MRPL issue was fully litigated and considered, culminating in the Commission's *June 2026 Order*, which denied CGC's Exceptions, exempted agricultural customer-generators from MRPL, and approved the Settlement, as modified. PPL Answer to CGC Petition at 3-6.

PPL identifies the four principal requests made by CGC, described *supra*, and argues that, however phrased, these are requests for reconsideration of the Commission's merits ruling and should be denied. PPL Answer to CGC Petition at 7-8. On CGC's 52 Pa. Code § 54.182 argument, PPL responds that CGC already made the same argument in its Exceptions, and the Commission expressly rejected it. PPL quotes

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[11] Section 1304 of the Code, 66 Pa.C.S. 1304.

the Commission's *June 2026 Order* as finding that all five of CGC's Exceptions advanced one overarching theory: that the MRPL provisions improperly converted a demand-based regulatory concept into a net-power-flow/export-based classification mechanism, and that the Commission rejected that theory. PPL argues that because the Commission already considered and rejected CGC's regulatory argument, CGC's Petition does not satisfy *Duick*. PPL Answer to CGC Petition at 8-9.

PPL further argues that, even on the merits, CGC's interpretation of Section 54.182 of the Commission's Regulations is flawed. PPL states that Section 54.182 defines MRPL as the highest level of demand for a customer based on PJM's PLC standard or its equivalent, "and as may be further defined by the EDC tariff in a particular service territory." PPL argues that the final phrase refers to the term "maximum registered peak load" as a whole, not merely to the phrase "highest level of demand." Thus, according to PPL, the Regulation specifically authorizes a utility-specific tariff definition of MRPL, subject to Commission review and approval. PPL also argues that even if the Regulation did not authorize PPL's approach, PPL requested any necessary waivers, including waivers related to customer groupings under 52 Pa. Code §§ 54.187 and 69.1805. PPL Answer to CGC Petition at 9-12.

PPL next responds to CGC's contention that the Commission improperly relied on *UGI DSP V* and *Citizens' 2025 Rate Case*. PPL argues that the Commission did not rely solely on those precedents but instead based its ruling on the evidence and arguments presented in the instant proceeding, along with relevant legal authorities. PPL states that the Commission evaluated the MRPL record in depth, relied on *UGI DSP V* and *Citizens' 2025 Rate Case* as support, and specifically found that PPL's position was stronger because the PPL record contained utility-specific evidence of GSC-1 default service rate impacts. PPL also states that the Commission made independent findings that PPL's MRPL proposal, as modified by the Settlement, is just and reasonable, supported by the record, and consistent with the AEPS Act, the Code, Commission Regulations, and Commission precedent. PPL Answer to CGC Petition at 12-13.

PPL also opposes CGC's request for clarification of the legal and evidentiary standard supporting assignment of customer-generators to GSC-2. PPL states that CGC already raised arguments concerning the proper standard, and that the Commission's *June 2026 Order* made clear that a non-unanimous settlement must be supported by substantial evidence, produce just and reasonable rates, be in the public interest, and conform to Commission orders and Regulations. PPL argues that this is the same standard CGC itself identified in its Exceptions, and that nothing in the Commission's *June 2026 Order* suggests the Commission applied any different standard. PPL adds that the Commission examined the evidence and legal arguments on MRPL at length, including evidence supporting classification of no-load customer-generators in Rate GSC-2. PPL Answer to CGC Petition at 13-14.

With respect to the modification made by the *June 2026 Order* to the Settlement's MRPL provisions, PPL argues that no further clarification is necessary because the Commission already explained why agricultural customer-generators were exempted from MRPL, while other customer-generators were not. PPL states that the Commission found the MRPL provisions were designed to address large "no-load" net-metering operations that send nearly all of their power to the grid and consume very little power onsite. By contrast, according to PPL's summary of the Commission's reasoning, the record did not establish that farm-based biogas digesters fit that profile; for those farms, biogas generation is part of the farm operation, capturing methane for continuous onsite generation and producing economic and environmental benefits such as manure management, odor reduction, methane mitigation, and use of digestate as fertilizer or animal bedding. PPL argues that the Commission already explained why the record did not support treating those systems as merchant generators. PPL Answer to CGC Petition at 15-16.

PPL concludes that CGC's Petition fails to satisfy the reconsideration or clarification standard and should be dismissed. PPL asks the Commission to deny CGC's requests, reject the attempt to revisit arguments already addressed in the *June 2026 Order*, and affirm the *June 2026 Order*'s findings and conclusions approving the Settlement as modified. PPL Answer to CGC Petition at 17.

The OCA's Letter in Lieu of Answer opposes CGC's Petition, explaining that the *June 2026 Order* addressed the need for exemptions for agricultural customer-generators using anaerobic digesters or biogas generation systems fueled by biologically derived methane gas under the AEPS Act. The OCA quotes the Commission's *June 2026 Order* as concluding that the MRPL provisions protect customers from an inequitable and escalating cost shift, preserve reasonable transition protections for customer-generators, and establish a just, reasonable, evidence-based rate-classification framework for customer-generators whose exports materially affect default service procurement and class cost responsibility, while exempting agricultural customer-generators that use anaerobic digesters or biogas generation systems and are owned or operated by persons engaged in agricultural operations. OCA Letter in Lieu of Answer at 1-2.

Similar to PPL, the OCA summarizes CGC's Petition as raising four principal points. The OCA then frames the applicable reconsideration standard under *Duick*, explaining that a petition for reconsideration must raise "new and novel arguments," arguments not previously heard, or considerations overlooked or not addressed by the Commission. OCA Letter in Lieu of Answer at 2.

Applying that standard, the OCA concludes that CGC's Petition does not satisfy the requirements for reconsideration. In the OCA's view, CGC's arguments about the legality of the MRPL tariff language and the Commission's authority to approve that language were made in the underlying proceeding and were directly addressed in the Commission's *June 2026 Order*. The OCA specifically notes that the Commission already determined that PPL may use tariff language to alter the application of the MRPL construct, provided that the resulting tariff classification is supported by the record and remains consistent with the Code, Commission Regulations, and the AEPS Act. Because CGC's Petition does not present new or novel arguments, previously unheard arguments, or considerations overlooked by the Commission, the OCA states that reconsideration should be denied. OCA Letter in Lieu of Answer at 2.

The OCA further states that it remains a signatory to the Joint Petition and continues to support the Settlement, as modified by the Commission's *June 2026 Order*. Accordingly, the OCA's position is narrow and procedural: it does not reargue the full merits of MRPL but instead opposes reconsideration because CGC's Petition repeats issues already raised, considered, and rejected. The OCA therefore asks the Commission to deny CGC's Petition. OCA Letter in Lieu of Answer at 2-3.

2. Disposition of CGC's Petition

At the outset, we note that any issue or argument that we do not specifically address shall be deemed to have been duly considered and denied without further discussion. The Commission is not required to consider, expressly or at length, each contention or argument raised by the parties. *Consolidated Rail Corp. v. Pa. PUC*, 625 A.2d 741 (Pa. Cmwlth. 1993); *see also, generally, Univ. of Pa. v. Pa. PUC*, 485 A.2d 1217 (Pa. Cmwlth. 1984).[12]

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[12] *See also Metropolitan Edison Co. v. Pa. PUC*, 22 A.3d 353 (Pa. Cmwlth. 2011), *appeal denied*, 22 A.3d 353 (Pa. 2012) (citing *Wheeling & Lake Erie Railway Company v. Pa. PUC*, 778 A.2d 785, 794 (Pa. Cmwlth. 2001) for the proposition that the Commission is not required to expressly consider all of the arguments set forth by the parties in its Order).

As previously noted, Petitions for Reconsideration and Clarification are governed by the standards of *Duick*, under which the Commission applies a two-step analysis. First, we determine whether a party has offered new and novel arguments or identified considerations that appear to have been overlooked or not addressed by the Commission in its previous Order. We will not reconsider our previous decision based on arguments that have already been considered. The second step of the *Duick* analysis, therefore, is to evaluate the new or novel argument, or overlooked consideration, to determine whether to exercise our discretion to modify our previous decision.

Upon review of CGC's Petition and the record evidence in this proceeding, we shall deny CGC's Petition on the grounds that it fails to persuade us that reconsideration and/or clarification is warranted. Under the standard set forth in *Duick*, reconsideration is not intended to afford a party a second opportunity to present questions already considered and decided; rather, the petition must identify new and novel arguments or matters overlooked or not addressed by the Commission.

Although CGC styles much of its requested relief as "clarification," it ultimately asks the Commission to reconsider and modify the *June 2026 Order*. The four principal issues identified by CGC substantially restate the statutory, regulatory, evidentiary, and discrimination arguments advanced in its Exceptions and expressly addressed in the Commission's disposition of the MRPL issue in the *June 2026 Order*. Under *Duick*, CGC's Petition may not be used simply to reassert arguments already presented in the underlying proceeding or to obtain a second opportunity to relitigate issues that were considered and resolved in the Commission's *June 2026 Order*.

As such, we agree with PPL and the OCA that CGC has not identified a material issue overlooked by the Commission and has not otherwise satisfied the applicable reconsideration standard. CGC Petition at 1-3, 15-17; PPL Answer to CGC Petition at 6-8; OCA Letter in Lieu of Answer at 2-3. Each of CGC's four requests ultimately rests upon the same underlying premise – that the Commission lacks authority to approve tariff language permitting exported generation to be considered in assigning default service customer classifications. Because we reject that premise for the reasons set forth in the *June 2026 Order* and reaffirmed herein, none of CGC's four requests warrant reconsideration.

First, CGC argues that the Commission erred as a matter of law by permitting PPL's tariff to redefine a Commission Regulation. CGC maintains that 52 Pa. Code § 54.182 defines MRPL as the highest level of customer "demand," and that incorporating exported generation into the MRPL calculation does not merely "further define" that term but substantively modifies the regulatory standard in a manner that would require formal rulemaking. CGC therefore asks the Commission to clarify whether exported generation constitutes demand, whether the approved tariff merely implements Section 54.182, or whether the Commission relied on independent statutory authority to alter the regulatory construct. CGC Petition at 3-8.

This argument was previously raised by CGC and rejected by the Commission. CGC Exc. at 7-9; *June 2026 Order* at 192-202. The *June 2026 Order* considered CGC's central theory that the Settlement improperly transformed a demand-based concept into a net-power-flow or export-based classification mechanism and concluded that PPL may use tariff language to further define the application of MRPL where the resulting classification is supported by the record and remains consistent with the Code, the AEPS Act, and Commission Regulations. *June 2026 Order* at 192-202.

In the *June 2026 Order*, the Commission approved a tariff methodology under which net power flow, including exported generation, may be considered for purposes of determining the appropriate default service rate classification based upon its effect on default service procurement and class cost responsibility. The Commission did not conclude that exported generation constitutes customer demand. Moreover, Section 54.182 expressly recognizes that MRPL may be "further defined by the EDC tariff in a particular service territory." 52 Pa. Code § 54.182. In the *June 2026 Order*, we considered CGC's contention that PPL's tariff exceeded the permissible scope of that language and rejected it upon consideration of the tariff provisions, the evidentiary record, and applicable precedent. CGC's Petition identifies no new authority or overlooked consideration that would cause us to disturb that determination.

Relatedly, CGC renews its contention that *UGI DSP V* and *Citizens' 2025 Rate Case* do not resolve its challenge under Section 54.182 because those proceedings involved different tariff mechanisms (SPLI and Billing Demand), rather than PPL's use of the specifically defined term MRPL. CGC Petition at 8-10. CGC previously raised this same distinction in its Exceptions, arguing that *UGI DSP V* did not address whether PPL could alter the meaning or application of MRPL through tariff language. CGC Exc. at 8-9; *June 2026 Order* at 167, 199. The *June 2026 Order* considered and rejected that contention and independently concluded, based upon PPL's tariff language, the evidentiary record, and applicable precedent, that the MRPL provisions were lawful and consistent with the Code, Commission Regulations, and the AEPS Act. *June 2026 Order* at 192-202. CGC's renewed attempt to distinguish those precedents, therefore, does not identify a new or novel argument or an issue overlooked by the Commission.

Moreover, the *June 2026 Order* did not rely exclusively upon *UGI DSP V* or *Citizens' 2025 Rate Case* in resolving CGC's challenge. Namely, although those decisions provided relevant precedent, the Commission also separately considered PPL's tariff language and the utility-specific evidence developed in this proceeding concerning default service procurement, net-metering compensation, and GSC-1 rate impacts. *See June 2026 Order* at 196-201.

Third, we deny CGC's request for reconsideration to clarify whether the MRPL construct alters the legal significance of customer-generator status under the AEPS Act and what legal and evidentiary standard supports assignment of affected customer-generators to GSC-2. CGC acknowledges that the Commission possesses authority to establish customer classifications and evaluate cost causation, but asks the Commission to explain how export activity, limited onsite load, procurement impacts, and other system effects render certain customer-generators sufficiently analogous to Large C&I customers for default-service classification. CGC also suggests that reclassification may alter statutory rights associated with customer-generator status and net-metering compensation. CGC Petition at 10-13.

Although CGC frames this request somewhat differently than it did in its prior pleadings, the underlying legal and evidentiary issues are not new. In its Objections to the Settlement, CGC argued that the MRPL provisions were inconsistent with the AEPS Act and Pennsylvania's net-metering framework because the AEPS Act establishes customer-generators as retail customers entitled to receive full retail value for excess generation, and because, in CGC's view, incorporating exports into MRPL would use customer-generator production as the basis for reclassification and reduced compensation. CGC further argued that affected customer-generators remain retail customers operating under Commission-approved tariffs and are not wholesale supply resources participating in PJM markets. R.D. at 241-43 (summarizing CGC Objections at 8-11).

CGC carried those same concerns forward in its Exceptions. In its Exception No. 2, CGC argued that the MRPL provisions alter the treatment of customer-generators and create unreasonable distinctions among similarly situated projects operating under the same statutory net-metering framework. CGC questioned why some customer-generators should retain GSC-1 treatment while others are assigned to GSC-2 when, in CGC's view, the record did not establish differences in cost causation, operational characteristics, or system impacts sufficient to justify that treatment. CGC Exc. at 9-12; *June 2026 Order* at 170-71.

Likewise, in its Exception No. 3, CGC challenged the evidentiary basis supporting reclassification, asserting that PPL had not produced a cost-of-service study, class cost-allocation analysis, or system-impact study demonstrating costs attributable to GSC-1 customer-generators sufficient to justify different classification under MRPL. CGC also argued that PPL failed to account adequately for asserted benefits of customer-generator output, including reduced procurement obligations and avoided capacity and energy costs. CGC Exc. at 12-15; *June 2026 Order* at 175-77.

Further, in its Exception No. 4, CGC expressly identified among the allegedly unresolved issues whether the MRPL provisions were consistent with the AEPS Act and the Code, whether they were supported by substantial evidence, and whether they created discriminatory treatment among similarly situated customer-generators. CGC Exc. at 15-17; *June 2026 Order* at 180-82. In its Exception No. 5, CGC similarly argued that the Commission was required to determine whether the inclusion of exported generation was supported by cost-causation evidence and whether the resulting treatment of customer-generators was just, reasonable, and non-discriminatory. CGC Exc. at 17-19; *June 2026 Order* at 183-86.

Thus, CGC's present request is more specifically phrased as a request that the Commission identify the precise "legal and evidentiary standard" governing assignment to GSC-2, but the constituent issues underlying that request – customer-generator status under the AEPS Act, the effect of reclassification on net-metering compensation, the relevance of exports and procurement impacts, cost causation, substantial evidence, and the reasonableness of differential classification – were raised and litigated before entry of the *June 2026 Order*. Recasting those previously litigated issues as a request for clarification does not, without more, identify a new or novel argument or a consideration overlooked by the Commission for purposes of *Duick*.

Moreover, the *June 2026 Order* addressed those issues. The Commission independently reviewed the evidence regarding the characteristics of no-load customer-generators, their substantial exports, their limited or nonexistent onsite consumption, the recovery of their net-metering compensation through the GSC-1 reconciliation mechanism, and the resulting impact on default service procurement and class cost responsibility. The Commission determined that the record contained substantial evidence regarding the relevant default-service cost impacts and concluded that MRPL appropriately classifies customers based upon their net-power-flow impact on default service procurement and rate class cost responsibility. The Commission also rejected CGC's discrimination challenge and found that the Settlement's grandfathering provisions and enhanced GSC-2 compensation reasonably mitigated the effect of reclassification. *June 2026 Order* at 192-98.

The *June 2026 Order* also expressly addressed the governing legal standard. In disposing of CGC's Exception No. 5, the Commission found that the ALJs correctly recognized that a non-unanimous settlement must be supported by substantial evidence, produce just and reasonable rates, be in the public interest, and conform to Commission orders and Regulations. The Commission further found that the ALJs made independent findings that PPL's MRPL proposal, as modified by the Settlement, was just and reasonable, supported by the record, and fully comported with the AEPS Act, the Code, Commission Regulations, and Commission precedent. *June 2026 Order* at 196.

Accordingly, CGC's present characterization of the issue as one concerning the continuing legal significance of customer-generator status under the AEPS Act does not warrant reconsideration or further clarification. As discussed above, CGC previously argued that the MRPL provisions were inconsistent with the AEPS Act and Pennsylvania's net-metering framework, improperly affected the classification and compensation of customer-generators, and lacked the legal and evidentiary support necessary to justify assignment of affected customer-generators to GSC-2. The *June 2026 Order* considered those arguments and determined that PPL's MRPL proposal, as modified by the Settlement, was just and reasonable, supported by substantial evidence, and was consistent with the AEPS Act, the Code, Commission Regulations, and Commission precedent. *See June 2026 Order* at 192-202. In its Petition, CGC identifies no new authority, evidence, or consideration overlooked by the Commission that would warrant revisiting that determination under *Duick*.

With respect to CGC's remaining request for clarification, we likewise find no basis for reconsideration concerning the agricultural customer-generator exemption. As clearly explained in the *June 2026 Order*, the exemption was not based solely upon the agricultural nature of the facilities or upon the fact that they export electricity. Rather, the record demonstrated that qualifying anaerobic digester and biogas facilities are integrated into active agricultural operations and did not present the same no-load or minimal-load operational profile that the MRPL provisions were designed to address. *See June 2026 Order* at 187-92. Thus, the agricultural exemption reflects the particular evidentiary record concerning those facilities and does not undermine the Commission's separate determination that the MRPL provisions are appropriate for the non-exempt customer-generators addressed by the Settlement. CGC identifies no new evidence or overlooked consideration that warrants revisiting that determination.

We likewise agree with the OCA that CGC's Petition does not present new or novel arguments or identify considerations overlooked by the Commission. We note that the OCA remains a signatory to the Settlement and continues to support the MRPL provisions, as modified, emphasizing that the Commission already determined that those provisions protect customers from an inequitable and escalating cost shift, preserve reasonable transition protections, and establish a just, reasonable, and evidence-based rate-classification framework. OCA Letter in Lieu of Answer at 1-3.

Therefore, finding no new or novel arguments or any considerations apparently overlooked by the Commission, we decline to exercise our discretion to reconsider and/or clarify the *June 2026 Order* based on the arguments contained in CGC's Petition.

Accordingly, CGC's Petition is denied.

III. Conclusion

Upon review, we shall deny CGC's Petition, consistent with this Opinion and Order; **THEREFORE,**

IT IS ORDERED:

1. That the Petition for Reconsideration and Clarification filed by the Customer-Generator Coalition on June 26, 2026, seeking reconsideration of the Commission's Opinion and Order entered on June 11, 2026, relative to the above-captioned proceeding, is denied, consistent with this Opinion and Order.

2. That this proceeding be marked closed.

BY THE COMMISSION,

Matthew L. Homsher
Secretary

(SEAL)

ORDER ADOPTED: August 27, 2026

ORDER ENTERED: August 27, 2026