



October 5, 2026

**VIA E-File Only**

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

**Re: Petition of PPL Electric Utilities Corporation for Approval of Its Non-Bypassable Customer Protection Transmission Rider, Elimination of Its Transmission Service Charge, Changes to Its Generation Supply Charges, Changes to Its Retail Tariff, and Changes to Its Electric Generation Supplier Coordination Tariff**  
Docket Nos. P-2026-3065185; P-2024-3047290; P-2026-3065186.

***Petition to Intervene and Answer of CAUSE-PA***

Dear Secretary Homsher:

Please find the attached **Petition to Intervene and Answer of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ria Pereira", is placed over a light gray rectangular background.

Ria Pereira, Esq.  
*Counsel for CAUSE-PA*

CC: Certificate of Service  
Chief Administrative Law Judge Charles E. Rainey, Jr. (email only, [crainey@pa.gov](mailto:crainey@pa.gov))  
Paul Diskin, TUS (email only, [pdiskin@pa.gov](mailto:pdiskin@pa.gov))  
Darren Gill, TUS (email only, [dgill@pa.gov](mailto:dgill@pa.gov))

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|                                            |   |                           |
|--------------------------------------------|---|---------------------------|
| Petition of PPL Electric Utilities         | : | Docket No. P-2026-3065185 |
| Corporation for Approval of Its Non        | : |                           |
| Bypassable Customer Protection             | : |                           |
| Transmission Rider, Elimination of Its     | : |                           |
| Transmission Service Charge, Changes to    | : |                           |
| Its Generation Supply Charges, Changes to  | : |                           |
| Its Retail Tariff, and Changes to Electric | : |                           |
| Generation Supplier Coordination Tariff    | : |                           |
|                                            | : |                           |
| Petition of PPL Electric Utilities         | : | Docket No. P-2024-3047290 |
| Corporation for Amendment of Its Default   | : |                           |
| Service Program and Procurement Plan for   | : |                           |
| the Period June 1, 2025, through May 31,   | : |                           |
| 2029                                       | : |                           |
|                                            | : |                           |
| Petition of PPL Electric Utilities         | : | Docket No. P-2026-3065186 |
| Corporation for Waiver of Any and All      | : |                           |
| Regulations Necessary to Implement the     | : |                           |
| Company's Proposals                        | : |                           |

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**PETITION TO INTERVENE AND ANSWER  
OF THE COALITION FOR AFFORDABLE UTILITY SERVICES  
AND ENERGY EFFICIENCY IN PENNSYLVANIA**

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**PENNSYLVANIA UTILITY LAW PROJECT**

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**October 5, 2026**

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), pursuant to the provisions of the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (PUC or Commission), 52 Pa. Code §§ 5.61-5.76, and through its counsel at the Pennsylvania Utility Law Project, hereby files this Petition to Intervene and Answer in the captioned proceeding. In support thereof, CAUSE-PA states as follows:

1. On September 14, 2026, PPL Electric Utilities Corporation (PPL) filed a Petition for Approval of its Non-Bypassable Customer Protection Transmission Rider, Elimination of its Transmission Service Charge, Changes to its Generation Supply Charges, Changes to its Retail Tariff, Changes to its Electric Generation Supplier Coordination Tariff, Amendment of its Default Service Plan, and Any Necessary Waivers Of Commission Regulations (herein, collectively, Petition).

2. In its Petition, PPL requests Commission approval of (1) a non-bypassable Customer Protection Transmission Rider (CPTR) to recover all Network Integration Transmission Service (NITS) costs and certain other transmission costs and to allocate certain network upgrade costs to Rate LP-6; (2) elimination of its Transmission Service Charge (TSC); (3) changes to the Generation Supply Charges to include costs currently recovered under the TSC that will not be recovered through the CPTR, along with associated net over or undercollection balance; (4) proposed changes to PPL's existing Default Service Program and Procurement Plan (DSP VI) to incorporate proposed programmatic and process changes; (5) proposed changes to the Company's Retail Tariff, Electric Pa. P.U.C. No. 202 (Retail Tariff), and its Electric Generation Supplier Coordination Tariff, Electric Pa. P.U.C. No. 2S (Supplier Tariff), to implement the CPTR proposal; and (6) waivers of any and all Commission regulations that are needed to implement PPL's proposals.

3. CAUSE-PA was a signatory party to the Commission-approved Settlement in PPL's recent base rate proceeding, which established PPL's LP-6 rate class for large load customers.<sup>1</sup>

4. On October 2, 2026, the Pennsylvania Office of Consumer Advocate filed an Answer to PPL's Petition, as well as a Formal Complaint against PPL' which appropriately seeks to address the unjustness and unreasonableness of PPL's rates, and the inadequacy of protections for existing customers from known and foreseeable costs and reliability impacts caused by the interconnection of large load users onto PPL's system. The issues in OCA's Formal Complaint are interrelated to the proposals set forth in the Petition.

5. CAUSE-PA is deeply concerned that, absent additional reforms, PPL's CPTR proposals may have a disproportionately harmful impact on PPL's low and moderate income customers. CAUSE-PA is also concerned that PPL's requested relief is insufficient to hold large load users responsible for the costs which they have already caused and will continue to cause, driving higher prices for PPL's low and moderate income customers.

6. PPL's CPTR proposal fails to set forth a clear methodology for determining costs which would not have been incurred but for large load customers ("but for" costs) so that such costs can be properly identified and assigned to PPL's LP-6 rate class. Without clear methodology to identify and assign all costs caused by large load customers, the Company's low and moderate income customers will continue to be subject to improper recovery of costs caused by large load customers, exposing these vulnerable customer groups to unjust, unreasonable, and/or unduly discriminatory and/or preferential rates which are in contravention to the Public Utility Code.<sup>2</sup>

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<sup>1</sup> Pa. PUC v. PPL (PPL 2025 Base Rate Proceeding), Opinion and Order, Docket Nos. R-2025-3057164; et al. (Order entered June 11, 2026).

<sup>2</sup> 66 Pa. C.S. §§ 1301-1304.

7. CAUSE-PA is also concerned that PPL's proposals fail to appropriately account for the impact of large load users on PPL's low and moderate income customers, specifically, as well as the impact on universal service programs and associated costs that are ultimately borne by PPL's residential ratepayers. These impacts include the direct increase in costs for a majority of PPL's low and moderate income customers not enrolled in PPL's Customer Assistance Program (CAP), the degradation of benefits available through PPL's CAP resulting from the erosion of maximum CAP credits, and the increased costs under PPL's Universal Service Rider based on the difference between CAP customer payments and full tariff rates.

8. For these reasons and the reasons set forth below, CAUSE-PA submits that PPL's CPTR proposal requires substantial additional reforms to protect low and moderate income customers from higher costs and other harms caused by large load customers. As such, CAUSE-PA respectfully requests that the Commission refer this matter to the Office of Administrative Law Judge (OALJ) for further investigation and creation of a detailed evidentiary record prior to its disposition of the requests contained in PPL's Petition.

9. CAUSE-PA also avers that the allegations set forth in PPL's proposals must be thoroughly reviewed through an on the record proceeding, in which parties are afforded sufficient time to fully investigate PPL's proposals through the exchange and review of discovery, the exchange of testimony, and the creation of an evidentiary record. As such, CAUSE-PA respectfully requests that the Commission refer this proceeding to its OALJ for further proceedings.

### **Petition to Intervene**

10. Eligibility to intervene in Commission proceedings is governed by 52 Pa. Code § 5.72, which provides in relevant part that “[a] petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought.” 52 Pa. Code § 5.72(a).

11. Section 5.72 further provides that the right or interest may be one “which may be directly affected, and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.” 52 Pa. Code. § 5.72(a)(2).

12. Even though Section 5.72 speaks of the rights of a “person” to intervene, the Commonwealth Court has consistently stated that “an association may have standing as a representative of its members ... as long as an organization has at least one member who has or will suffer a direct, immediate, and substantial injury to an interest as a result of the challenged action, [i.e., is aggrieved, the organization] has standing.” Energy Cons. Council of Pa. v. Pa. PUC, 995 A.2d 465, 476 (Pa. Commw. 2010) (alteration in original) (citing Trippe Park v. Pa. PUC, 415 A.2d 967 (Pa. Commw. 1980); Parents United for Better Schools v. School District of Philadelphia, 646 A.2d 689 (Pa. Commw. 1994)).

13. CAUSE-PA is an unincorporated association of low and moderate income individuals that advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain affordable water, electric, heating, and telecommunication services.

14. CAUSE-PA membership is open to moderate and low income individuals residing in the Commonwealth of Pennsylvania who are committed to the goal of helping low income families maintain affordable access to utility services and achieve economic independence.

15. CAUSE-PA is located, c/o the Pennsylvania Legal Aid Network, at 118 Locust Street, Harrisburg, PA 17101.

16. CAUSE-PA has a significant interest in the impact that PPL's proposals will have on moderate and low income residential customers. Specifically, the outcome of this proceeding will impact whether and to what extent PPL's low and moderate income customers will continue to bear increased rates and, in turn, increased unaffordability as a result of large load users. These interests are not adequately represented by other participants in this proceeding.

17. Members of CAUSE-PA are located within PPL's service territory and will be directly affected by the outcome of this proceeding. Particularly, this proceeding will affect the price that CAUSE-PA members pay for electric services, and the cost impacts of large load users on low and moderate income residential customers as a result of transmission costs which would not have been incurred but for these large load users.

18. CAUSE-PA was an active party to PPL's recent base rate proceeding and a signatory party to the Commission-approved Settlement authorizing PPL to implement its LP-6 rate class and associated tariff for large load users.<sup>3</sup> CAUSE-PA was also an active party and signatory to the Commission-approved Settlement in PPL's last Default Service Plan (DSP) proceeding.<sup>4</sup> The outcome of this proceeding will impact settlements and orders from these prior proceedings, in turn impacting the rights of CAUSE-PA's members.

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<sup>3</sup> PA PUC v. PPL, Docket Nos. R-2025-3057164, et al.

<sup>4</sup> Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2025 through May 31, 2029, Docket No. P-2024-3047290.

19. CAUSE-PA has standing to intervene because its members have or will suffer a direct, immediate, and substantial injury to an interest as a result of this proceeding. See Energy Cons. Council of Pa., 995 A.2d at 476.

20. CAUSE-PA is represented in this proceeding by:

Ria M. Pereira, Esq., PA ID: 316771  
Elizabeth R. Marx, PA ID: 309014  
Levi A. Phillips, Esq., PA ID: 338477  
John W. Sweet, Esq., PA ID: 320182  
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118 Locust Street  
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21. Counsel for CAUSE-PA consents to the service of documents by electronic mail to [pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org), as provided in 52 Pa. Code § 1.54(b)(3).

### **Answer**

CAUSE-PA has preliminarily reviewed PPL's Petition and – absent substantial revision – is opposed to the proposed rates and associated tariff revisions and waivers requested therein.

As a threshold matter, it is unclear whether the Commission could approve PPL's CPTR proposal to be inclusive of distribution, transmission, and generation charges, or if a separate non-bypassable rider for Reliability Backstop Procurement (RBP) and Interim Resource Adequacy Service (IRAS) costs is necessary. The Public Utility Code and Commission regulations prohibit the bundling of generation supply and transmission rates.<sup>5</sup> PPL indicates that the CPTR is designed to recover all Network Integration Charges (NITS) and "certain other transmission costs" directly from PPL's retail customers on a non-bypassable basis,<sup>6</sup> but also

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<sup>5</sup> 66 Pa. C.S. §§ 2804(3), 2807(c)(1); 52 Pa. Code § 54.4(b)(3).

<sup>6</sup> Petition at ¶¶ 69-71.

indicates that the CPTR could be used to assign potential PJM-assigned RBP and IRAS related costs directly to certain large load customers.<sup>7</sup> Costs incurred under the RBP and IRAS would be generation supply costs rather than transmission costs. It is therefore unclear whether the CPTR can be approved to include costs associated with both transmission upgrades as well as the RBP and IRAS mechanisms pursuant to this authority. To be clear, CAUSE-PA supports the assignment of both sets of costs (transmission and generation) directly to large load data center customers that would not have been incurred but for these data centers connecting, but there remains a legal question as to whether transmission costs can be bundled with generation costs or whether a separate non-bypassable rider to RBP and IRAS costs is also necessary.

Setting this threshold question aside, CAUSE-PA has preliminarily reviewed PPL's Petition and is concerned that its tariff proposals fail to set forth sufficient specificity or a clear methodology for identifying and assigning all "but-for" transmission costs to PPL's LP-6 class for large load users. PPL's Petition and proposed tariff revisions also fail to account for increased costs to PPL's low income customers and universal service programs as a result of large load users. The Commission must direct PPL to implement additional revisions to the proposals set forth in its Petition to clearly identify and protect low and moderate income residential customers from increased costs to PPL's systems which would not have been incurred but for the interconnection of large load users.

CAUSE-PA is also concerned that PPL's proposed tariff revisions would fail to protect PPL's low and moderate income customers from transmission costs incurred as a result of large load users. CAUSE-PA asserts that these proposals would subject PPL's low and moderate income customers to rates, and terms and conditions of service, which are unjust, unreasonable,

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<sup>7</sup> Petition at ¶¶ 76-85.

unduly discriminatory and/ or preferential, and in contravention with key provisions in the Public Utility Code.<sup>8</sup> The Commission should act to protect PPL's existing ratepayers, including low and moderate income customers, from continued bill unaffordability from transmission costs incurred as a result of large load users.

CAUSE-PA asserts that these matters must be thoroughly reviewed and investigated to ensure that all customers are able to access safe, affordable electric service within the PPL's service territory.

In addition, CAUSE-PA sets forth its Answer to PPL's Petition as follows:

**I. BACKGROUND**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted in part; denied in part. CAUSE-PA admits that PPL provides electric distribution, transmission and provider of last resort services to its customers across 29 counties in eastern and central Pennsylvania. CAUSE-PA lacks information or knowledge sufficient to form a belief about PPL's current customer count and the mileage of its service territory.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.

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<sup>8</sup> 66 Pa. C.S. §§ 1301-1304.

10. PPL's pro forma retail tariff supplement (attached to PPL's Petition as Appendix A) speaks for itself and requires no response. CAUSE-PA disagrees that the changes set forth in PPL's draft Retail Tariff are sufficient to protect PPL's low and moderate income consumers from cost shifting as a result of large load users. PPL's tariff revisions in Appendix A would allocate certain NITS and certain other transmission costs to its Rate LP-6 if it is determined that charges are "caused by (or attributable to) Rate LP-6 customers".<sup>9</sup> These proposed revisions do not provide sufficient detail to ensure that costs which would not have been incurred but for large load users are attributed to Rate LP-6. CAUSE-PA asserts that additional tariff reforms are necessary to ensure that PPL's low and moderate income customers are not held responsible for these costs.

11. PPL's supplier tariff supplement (attached to PPL's Petition as Appendix B), speaks for itself and requires no response. CAUSE-PA opposes the proposed revisions set forth at Appendix B, which would define transmission services to not include Network Integration Transmission Service (NITS) and the other transmission services "for which the costs are allocated to the Company and recovered through the Company's Customer Protection Transmission Rider."<sup>10</sup> Whether it is appropriate to carve out transmission costs in the manner that PPL is proposing is determined by whether PPL is appropriately allocating costs to Rate LP-6 customers as the but-for causers of these costs. CAUSE-PA asserts that PPL's proposed revisions set forth in Appendix A fail to appropriately allocate such costs.

12. The document attached at Appendix C of PPL's Petition pursuant to 52 Pa. Code 53.52(a) speaks for itself and requires no response. However, CAUSE-PA notes that PPL indicates in its Appendix C that its Petition would "ensure that Rate LP-6 large load interconnections, like data

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<sup>9</sup> PPL Petition, Appendix A, Second Revised Page No. 23A Canceling First Revised Page No. 23A.

<sup>10</sup> PPL Petition, Appendix B, Second Revised Page No. 8 Canceling First Revised Page No. 8.

centers, pay for incremental upgrades to the Company's transmission grid that provide broad system benefits but are associated with new large load customer development."<sup>11</sup> PPL further indicates that "[a]s explained in the Company's Petition, under the CPTR, PPL would allocate those transmission costs the Company would not have incurred but for the interconnection of large load customers to Rate LP-6."<sup>12</sup> However, PPL's proposed tariff revisions fail to set forth sufficient specificity or a clear methodology to identify and allocate all but-for costs. Without this specificity, PPL's low and moderate income customers will continue to be responsible for costs as a result of large load users.

## **II. LEGAL STANDARDS**

13. Paragraph 13 of PPL's Petition sets forth legal conclusions to which no response is required.

14. Paragraph 14 of PPL's Petition sets forth legal conclusions to which no response is required.

15. Paragraph 15 of PPL's Petition sets forth legal conclusions to which no response is required.

16. Paragraph 16 of PPL's Petition sets forth legal conclusions to which no response is required. By way of further answer, pursuant to its authority at 66 Pa. C.S. § 703(g), the Commission should afford parties to this proceeding a meaningful opportunity to investigate PPL's CPTR proposal and associated tariff revisions through an on-the-record proceeding. CAUSE-PA respectfully requests that the Commission refer this matter to OALJ for further proceedings.

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<sup>11</sup> PPL Petition, Appendix C, at 1.

<sup>12</sup> PPL Petition, Appendix C, at 3.

17. Paragraph 17 of PPL's Petition sets forth legal conclusions and questions of law to which no response is required. By way of further answer, CAUSE-PA asserts that impacts of PPL's CPTR proposal – including customer impacts and impacts to PPL's revenues, expenses, and services – are unclear and must be investigated through the course of this proceeding. CAUSE-PA is concerned that PPL's CPTR proposal fails to provide sufficient details to ensure that interconnecting large load users would be responsible for paying for transmission costs which would not have been incurred but for these users through Rate LP-6. These issues must be thoroughly investigated through this proceeding to ensure that PPL's low and moderate income customers do not continue to bear increased costs as a result of these large load users.

18. Paragraph 18 of PPL's Petition sets forth legal conclusions and questions of law to which no response is required.

19. Paragraph 19 of PPL's Petition sets forth legal conclusions and questions of law to which no response is required. By way of further answer, CAUSE-PA strongly supports a robust procedural schedule in this proceeding, ensuring the parties adequate time to meaningfully investigate PPL's proposals.

20. Paragraph 20 of PPL's Petition sets forth legal conclusions and questions of law to which no response is required.

21. Paragraph 21 of PPL's Petition sets forth legal conclusions and questions of law to which no response is required.

22. Paragraph 22 of PPL's Petition sets forth legal conclusions and questions of law to which no response is required. By way of further answer, CAUSE-PA is highly concerned about the continued impacts of large load users on PPL's systems, including the cost impacts that these customers have on the accessibility and affordability of basic energy service for low and

moderate income residential customers. PPL's current tariff provisions require further clarification and revisions to ensure that PPL's rates are designed so that providing service to other customer classes, including residential customers, does not subsidize PPL's large load customers in contravention of Section 2807(e)(7) of the Public Utility Code.

### **III. THE COMMISSION SHOULD REJECT PPL'S PETITION, ABSENT SUBSTANTIAL REFORM**

23. Denied. Absent substantial modification, CAUSE-PA is opposed to PPL's as-filed Petition and the requested relief contained therein. The stated goal of PPL's Petition is to hold large load users responsible for transmission costs that would not have been incurred but for these users.<sup>13</sup> CAUSE-PA supports this goal but, based on its preliminary review, PPL's proposed tariff revisions fail to set forth sufficient specificity or a clear methodology for identifying and assigning all transmission-related costs caused by large load customers. Additionally, the Petition fails to appropriately account for the uniquely harmful impact of cost-shifting on PPL's low and moderate income customers, and the resulting increase in universal service program costs and erosion of assistance provided through those programs. CAUSE-PA is particularly concerned that the projected increase in transmission costs will degrade the level of assistance provided by PPL's Customer Assistance Program (CAP) as Program participants exhaust available credit limits at accelerated rates as a result of increased unaffordability.<sup>14</sup> CAUSE-PA is also concerned that increased transmission costs caused by large load users will increase PPL's Universal Service Rider (USR) that are assigned to residential customers. While

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<sup>13</sup> PPL Petition, Appendix C, at 1, 3.

<sup>14</sup> PPL Electric Universal Service and Energy Conservation Plan (USECP), 2023-2027, at pp. 5, 13, available at: [https://www.puc.pa.gov/media/2407/ppl\\_further\\_revised\\_2023-27\\_usecp.pdf](https://www.puc.pa.gov/media/2407/ppl_further_revised_2023-27_usecp.pdf). As set forth in PPL's USECP, PPL's CAP customers are subject to maximum 12-month revenue shortfall amounts (CAP credit limits). If a customer exceeds the maximum credit amount before the 12-month period expires, the customer will be automatically moved to OTBB program status.

PPL's current tariff annually assigns \$11 million in USR costs to the LP-6 rate class, beginning January 2027, CAUSE-PA is concerned that this flat allocation is based on outdated load information and, thus, is insufficient to cover the transmission-related costs caused by the interconnection of large load users. These issues must be addressed through this proceeding to ensure that PPL's existing customers, including low income residential customers, are protected from cost shifting and increased unaffordability as a result of large load users.

24. Denied. CAUSE-PA disagrees that PPL's Petition should be approved as filed, or that it is reasonable and in the public interest to do so without modification. PPL claims in Paragraph 24 that its CPTR will assign "incremental" network upgrade costs associated with large load interconnections, along with costs associated with existing transmission systems. However, CAUSE-PA is concerned that PPL's proposal to assign only "incremental" transmission related costs to large load users is insufficient to ensure that large load users are responsible for *all* the costs that would not otherwise have been incurred but-for the introduction of these users onto PPL's system. Additional tariff revisions are necessary to ensure that PPL's low and moderate income customers are protected against these costs.

#### **A. BACKGROUND ON TRANSMISSION COSTS AND THEIR RECOVERY**

25. Admitted. By way of further answer, CAUSE-PA asserts that all transmission-related costs must be examined through this proceeding to ensure that all which would not have been incurred but for large load users are fully assigned to Rate LP-6 – even if those costs also benefit other ratepayers.

26. Admitted.

27. PJM's OATT, incorporated by reference in footnote 9 of PPL's Petition, speaks for itself and requires no response.

28. Denied. CAUSE-PA is without information or knowledge sufficient to form a belief about the averments set forth in Paragraph 28 of the Petition.
29. Attachment M-2 speaks for itself and requires no response.
30. Admitted.
31. Admitted.
32. Admitted.
33. Admitted.
34. Admitted.
35. The quoted contents of the PJM Manual at Paragraph 35 of the Petition speak for itself and require no response.
36. The quoted contents of the PJM Manual at Paragraph 36 of the Petition speak for itself and require no response.
37. The quoted contents of the PJM Manual at Paragraph 37 of the Petition speak for itself and require no response.
38. The quoted contents of the PJM Manual at Paragraph 38 of the Petition speak for itself and require no response.
39. The quoted contents of the PJM Manual at Paragraph 39 of the Petition speak for itself and require no response.

**B. PPL'S CURRENT LARGE LOAD TARIFF PROVISIONS ARE INADEQUATE TO PROTECT CUSTOMERS FROM RISING RATES AND RESULTING HARM CAUSED BY LARGE LOAD INTERCONNECTIONS.**

40. Admitted. By way of further answer, the substantial increase in capacity prices, as well as transmission line build-out to serve hyperscale load in Pennsylvania and neighboring states, is driving higher consumer costs.<sup>15</sup>

41. Denied. CAUSE-PA is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 41 related to the current pipeline of advanced stage data centers in PPL's service territory. CAUSE-PA asserts that the current pipeline of large load users in PPL's service territory, and the anticipated impact of these users on PPL's systems by 2034 and beyond, are material issues which must be investigated through the course of this proceeding.

42. Denied. CAUSE-PA is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 42 related to the specific amount of load that these projects would need, or whether projected load would triple PPL's system demand in approximately 8 years. However, CAUSE-PA has significant concern about the rapid pace of projected load growth in PPL's service territory, and the continued impacts to low and moderate income customers who are already struggling to afford and stay connected to services. A recent study conducted by Synapse Energy Economics projected data centers to contribute over 200 TWh of additional new load between 2029-2030 throughout PJM.<sup>16</sup> By comparison the state of Pennsylvania's 2025 electricity demand was approximately 150 TWh.<sup>17</sup>

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<sup>15</sup> See Synapse Energy Economics, Inc., Assessing Electricity Resource Adequacy in Pennsylvania and PJM, prepared for the Pennsylvania Public Utility Commission. (September 14, 2026) at 17-18, Table 7, available at: [https://www.puc.pa.gov/media/4044/2026\\_assessing\\_electricity\\_resource\\_adequacy\\_in\\_pa\\_and\\_pjm.pdf](https://www.puc.pa.gov/media/4044/2026_assessing_electricity_resource_adequacy_in_pa_and_pjm.pdf). (hereafter Synapse Resource Adequacy Report)

<sup>16</sup> Synapse Resource Adequacy Report at ii.

<sup>17</sup> Synapse Resource Adequacy Report at ii.

43. Admitted in part; denied in part. CAUSE-PA admits that, as a result of large load interconnections, PPL must make significant investments in the transmission system, including investments that are paid by large load users through Contributions in Aid of Construction (CIAC) and network investments which are recovered through transmission rates. CAUSE-PA denies these allegations to the extent that PPL's residential customers are required to incur costs if they derive ancillary or secondary benefits from investments that would not have occurred but for large load users. All costs that would not have been incurred but/for introduction of large load customers onto the grid must be fully allocated to large load customers.

44. Denied. CAUSE-PA is without knowledge or information sufficient to form a belief about the extent to which PPL has been mindful to not create stranded asset risk for other customers or to ensure that large load customers mitigate stranded asset risk from the transmission facilities costs. Whether PPL's averments in this Paragraph are correct is an issue that must be fully investigated and addressed in the context of this proceeding. CAUSE-PA asserts that PPL's current rules, policies, and procedures related to insulating low and moderate income customers from cost increases as a result of these potential stranded assets must be investigated through this proceeding to ensure that low and moderate income residential customers are protected from these costs impacts.

45. Admitted in part; denied in part. CAUSE-PA admits that PPL's Rate LP-6 tariff, along with provisions of its Electric Service Agreements (ESAs) and Construction Service Agreements (CSAs), address certain issues related to transmission facility costs and stranded costs from large load interconnections. These tariff provisions include ESA requirements, including that LP-6 customers provide security in an amount equal to the cost of upgrades needed to service

customers.<sup>18</sup> However, CAUSE-PA is concerned about whether PPL's existing LP-6 provisions, ESAs, and CSAs adequately shield residential low and moderate income customer from transmission costs from large load users. As PPL admits in Paragraph 63 of its Petition, more can be done to address the continued impacts of large load customers on PPL's ratepayers. CAUSE-PA asserts that additional tariff revisions are necessary to ensure that large load users are responsible for costs which would not have been incurred but for these users.

46. Admitted.

47. Admitted.

48. Admitted. However, CAUSE-PA asserts that a material issue in this case is whether, and to what extent, PPL's existing ESA terms protect residential customers from being held responsible for transmission costs from large load users. These issues must be investigated through the course of this proceeding.

49. Admitted. By way of further answer, CAUSE-PA admits that PPL's current Rate LP-6 tariff provisions require, as a condition of ESAs, that LP-6 customers separate critical and noncritical load, defined in PPL's load control and emergency conservation procedures developed pursuant to 52 Pa. Code § 57.52(b).<sup>19</sup> However, CAUSE-PA is concerned that PPL's current tariff fails to set forth sufficient specificity related to how critical and noncritical load are determined, and how critical and noncritical load is prioritized during grid emergencies.

50. Admitted in part; denied in part. CAUSE-PA agrees with PPL that affordability concerns have been largely driven by increases in generation capacity costs. As detailed by CAUSE-PA

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<sup>18</sup> PPL Retail Tariff, Supplement No. 2 to Electric Pa. P.U.C. No. 202 First Revised Page No. 35D Canceling Original Page No. 35D, available at: [https://www.pplelectric.com/site/-/media/PPLElectric/At-Your-Service/Docs/Current-Electric-Tariff/2026/October/402master4\\_posted-10-2-26.pdf](https://www.pplelectric.com/site/-/media/PPLElectric/At-Your-Service/Docs/Current-Electric-Tariff/2026/October/402master4_posted-10-2-26.pdf).

<sup>19</sup> PPL Retail Tariff, Supplement No. 2 to Electric Pa. P.U.C. No. 202 First Revised Page No. 35E Canceling Original Page No. 35E.

witness Patrick Cicero in PPL’s last rate proceeding, in June 2025 and in December 2025, high wholesale generation prices driven by large load users drove a spike in default service prices across the state – including within PPL’s service territory.<sup>20</sup> The average PPL customer on default service, because of the June 1, 2025, and December 1, 2025 PTC changes, experienced increases to their average annual bill by more than \$240 per year because of a corresponding 20% increase in rates during those two periods.<sup>21</sup> While these cost increases were driven in large part by capacity market issues, PPL’s residential customers are also likely to incur increased transmission costs as more large load entities seek to interconnect to PPL’s system. We disagree that transmission upgrades and associated costs will necessarily lead to reduced rates in the long term, and demand specific proof of the same. The Commission must direct PPL to make additional reforms to its tariffs to protect PPL’s low and moderate income customers, and to ensure that PPL’s existing retail and supplier tariffs are sufficiently protective so not to be unjust, unreasonable, unduly discriminatory and/or preferential, and otherwise violate Sections 102, 1301-1304, 1309, 1501-1502 of the Public Utility Code.

51. Denied. CAUSE-PA is without knowledge or information sufficient to form a belief as to the allegations in Paragraph 51 that PPL “strives to be judicious with its operations and maintenance (O&M) and capital expenditures”. However, PPL’s low and moderate income customers are struggling to afford and stay connected to services. As described by CAUSE-PA witness Cicero in PPL’s recent base rate proceeding, PPL’s low income customers carry markedly higher service termination rates for nonpayment compared to residential customers as a whole – with confirmed low income customers having a termination rate of 19.47%, compared to

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<sup>20</sup> Pa. PUC v. PPL, Docket Nos. R-2025-3057164, et, al, CAUSE-PA St. 1 at 91-92 (hereafter Pa. PUC v. PPL).

<sup>21</sup> Pa. PUC v. PPL, CAUSE-PA St. 1 (Cicero) at pp. 91-92.

a termination rate of 5.01% for all residential customers in 2024.<sup>22</sup> The Company's customers, including its low income customers, have already experienced significant costs impacts driven by large load interconnections. Mr. Cicero estimated that, for the average PPL customer on default service, the results of June 1, 2025, and December 1, 2025 PTC changes increased their average annual bill by more than \$240 per year.<sup>23</sup>

52. Admitted in part; denied in part. CAUSE-PA admits that PPL offers universal service and energy conservation plan (USECP) programs and Act 129 Programs, which are intended to help customers reduce their energy usage and bills. CAUSE-PA denies Paragraph 52 of the Complaint to the extent that these allegations suggest that these Programs adequately help customers reduce monthly bills. A significant number of PPL's low income customers have not been able to access these assistance programs. In PPL's last rate proceeding, CAUSE-PA witness Cicero explained that only 23% of PPL's estimated low income customers were enrolled in CAP.<sup>24</sup> Low income customers, including CAP and non-CAP customers, are shouldering costs caused by large load users in many ways, including: (1) directly by CAP customers whose annual maximum CAP credits are eroded by these cost increases, and (2) through USR costs, which are borne by residential customers, including low income customers who have not been able to access CAP.<sup>25</sup>

53. Admitted. By way of further answer, CAUSE-PA asserts that an allocation of \$11 million of USR costs each year to Rate LP-6 was based on previous costs impacts at the PJM level from large load users.<sup>26</sup> However, it is essential to examine increasing transmission and generation cost from large load users to ensure that Rate LP-6 customers are being held responsible for costs

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<sup>22</sup> PA. PUC v. PPL, CAUSE-PA St. 1 (Cicero) at p. 42.

<sup>23</sup> PA. PUC v. PPL, CAUSE-PA St. 1 (Cicero) at p. 92.

<sup>24</sup> PA. PUC v. PPL, CAUSE-PA St. 1 (Cicero) at p. 24.

<sup>25</sup> PA. PUC v. PPL, CAUSE-PA St. 1 (Cicero) at p. 93.

<sup>26</sup> PA. PUC v. PPL, CAUSE-PA St. 1 (Cicero) at pp. 93-94.

which would not have incurred but for these users. CAUSE-PA asserts that these issues are material to the present proceeding and must be examined to ensure that PPL's low and moderate income customers can afford and stay connected to services.

54. Denied. CAUSE-PA disagrees with PPL that its alleged focus on large load customer cost allocation and affordability aligns with federal and state governments. For example, on August 18, 2026, Governor Josh Shapiro signed Executive Order 2026-05, which set forth standards to protect Pennsylvania's utility consumers from reliability and cost impacts from large load users.<sup>27</sup> This Executive Order emphasized the need to "limit electric system costs caused by data centers from being imposed on other customers" and the need for data centers to "pay all Commission-jurisdictional interconnection costs that the utility incurs due to the development of data centers."<sup>28</sup> In addition, on May 12, 2026, the Commission entered a Final Order (Model Tariff Order). In its Model Tariff Order, the Commission set forth several important model tariff provisions for large load customers to prevent cost shifting. Key among the provisions included in the Commission's model tariff was a recommendation that tariff rules ensure large load customers are held responsible for all costs that would not have been incurred but for these customers: "... if a Network Improvement would not have been needed "but for" the interconnection of the Large Load Customer, then the costs of the upgrade should be allocated to that customer irrespective of whether other customers would benefit from it."<sup>29</sup> Contrary to these

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<sup>27</sup> Executive Order, Commonwealth of Pennsylvania, Governor's Office, Executive Order 2026-05 – Protecting Pennsylvania Consumers from Data Center Impacts, Issued August 18, 2026, by direction of Governor Josh Shapiro, available at: [https://www.pa.gov/content/dam/copapwp-pagov/en/governor/documents/eo2026\\_05\\_protecting%20pennsylvania%20consumers%20from%20data%20center%20impacts\\_final\\_executed.pdf](https://www.pa.gov/content/dam/copapwp-pagov/en/governor/documents/eo2026_05_protecting%20pennsylvania%20consumers%20from%20data%20center%20impacts_final_executed.pdf). (hereinafter, Executive Order 2026-05)

<sup>28</sup> Executive Order 2026-05 at p. 6.

<sup>29</sup> Interconnection and Tariffs for Large Load Customers, Final Order, Docket No. M-2025-3054271, at p. 42 (Final Order entered May 12, 2026). (hereinafter, Model Tariff Order)

provisions, PPL's proposed tariff revisions fall short of setting forth clear standards capable of ensuring full assignment of these but for costs to large load users.

55. Executive Order 2026-05 speaks for itself and requires no response. To the extent that a response is required, CAUSE-PA denies that PPL's allegations in Paragraph 55 to the extent that they allege that PPL's policies and procedures fully integrate the recommendations set forth in Executive Order 2026-05 which are designed to safeguard ratepayers from the negative cost and reliability impacts from data centers.

56. The White House Ratepayer Pledge issued on March 4, 2026 speaks for itself and requires no response. To the extent that a response is required, CAUSE-PA denies that PPL's tariff provisions, policies, and procedures reasonably protect PPL's ratepayers, including its low income ratepayers, from "price hikes" as a result of data centers.

57. Admitted.

58. Admitted in part; denied in part. CAUSE-PA admits that the Commission issued its Model Large Load Tariff. While CAUSE-PA admits that PPL's LP-6 tariff sets forth certain similar elements to the Commission's Model Tariff, CAUSE-PA denies the allegations set forth in Paragraph 58 of the Petition to the extent that they aver that PPL has sufficiently or meaningfully adopted the Commission's Model Tariff terms in a manner which sufficiently protects low and moderate income customers.

59. Admitted.

60. Chairman Stephen M. DeFrank's Statement on August 6, 2026 speaks for itself, and requires no response.

61. Vice Chair Kimberly Barrow's Motion on September 10, 2026 speaks for itself and requires no response. However, CAUSE-PA asserts that issues examined at the technical

conference this fall will be general in nature and do not preclude the full development of these issues as applied to PPL that must be examined through the course of this proceeding.

62. Vice Chair Kimberly Barrow's Motion on September 10, 2026 speaks for itself and requires no response.

63. Admitted. By way of further answer, CAUSE-PA agrees that more can be done to address the continued impacts of large load users interconnecting to PPL's system. It is imperative that the Commission direct PPL to make important additional reforms to its tariff provisions related to large load interconnecting customers to protect low and moderate income customers from increased transmission costs from large load users.

64. Admitted in part; denied in part. CAUSE-PA agrees that additional reforms to PPL tariff provisions, and attendant policies and procedures, are needed to fairly allocate costs of large load interconnections to protect the affordability and quality of service for non-large load customers. CAUSE-PA denies the allegations at Paragraph 64 to the extent that they aver that economic buildout and development from large load users should be encouraged absent significant and material protection from cost-shifting to PPL's low and moderate income customers. Instead, PPL has an obligation enshrined in both statute and Commission regulation to provide safe, reliable and affordable services to its customers, including residential customers.<sup>30</sup> It is unjust, unreasonable, and contrary to these obligations for PPL to prioritize interconnecting large load users to the detriment the quality and affordability of services of its low and moderate income customers.

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<sup>30</sup> See, e.g., 66 Pa. C.S. § 1501; 66 Pa. C.S. § 1301; 52 Pa. Code § 57.37.

**C. PPL’S PETITION, AS DRAFTED, FAILS TO APPROPRIATELY ENSURE THAT LARGE LOAD INTERCONNECTING CUSTOMERS PAY THEIR FAIR SHARE OF TRANSMISSION FACILITY COSTS.**

65. Denied. CAUSE-PA denies that PPL’s Petition should be approved, as filed, or that it will ensure that large load interconnecting users directly pay for all transmission facilities network upgrade costs associated with new large load interconnections and provide increased transparency related to recovery of transmission facilities costs. While PPL’s Petition would implement provisions which would allow for charges to be attributed to LP-6 customers if caused by (or attributed to) these customers,<sup>31</sup> it fails to set forth sufficient specificity to ensure that all transmission-related costs that would not have been incurred but for large load users are fully assigned to Rate LP-6 – regardless of whether other customers may receive an ancillary benefit. The Petition also fails set forth tariff revisions to protect against increased unaffordability to CAP customers and increased USR costs as a result of increased transmission costs from large load users.

66. Admitted. However, by way of further answer, while PPL relies on its LP-6 tariff, ESAs, and CSAs to protect ratepayers from increased transmission costs and potential stranded costs, CAUSE-PA does not believe that these protections are sufficient to ensure that PPL’s low and moderate income customers are protected from the but for costs as a result of large load interconnections. In fact, PPL admits in Paragraphs 59 and 63 of its Petition that, even with PPL’s LP-6 tariff, concerns about rate impacts remain.

67. Admitted. By way of further answer, CAUSE-PA lacks information or knowledge sufficient to form a belief about the total level of interconnection requests for large load customers which require transmission facility extensions and upgrades. However, CAUSE-PA believes the

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<sup>31</sup> PPL Petition, Appendix A, Second Revised Page No. 23A Canceling First Revised Page No. 23A.

amount to be significant based on regional projections of large load growth. PJM forecasts approximately 30 gigawatts (“GW”) of new load from data centers between 2025 and 2030<sup>32</sup> - with summer peak load growth of 3.6% per year for the next 10 years and 2.4% for the next 20 years, resulting in a 10-year increase of 65,733 MW and a 20-year increase of 96,704 MW, driven almost exclusively by data centers.<sup>33</sup>

68. Admitted in part; denied in part. CAUSE-PA admits that there has been a surge of interconnection requests by proposed large load projects but lacks knowledge or information sufficient to form a belief about the specific level of requests in PPL’s service territory. CAUSE-PA admits and agrees that there has been a call, including by the Commission, to address the impacts of large load interconnections, including cost shifting to other ratepayers. CAUSE-PA admits that PPL is proposing to create a CPTR mechanism through its current filing.

69. Admitted in part; denied in part. CAUSE-PA admits that PPL’s CPTR proposal would recover all NITS costs and certain other transmission costs directly from PPL’s retail customers. The extent to which PPL’s CPTR proposal would bring greater transparency into the allocation and recovery from all customers requires further investigation through the course of this proceeding. CAUSE-PA asserts that additional reforms to PPL’s proposals are necessary to

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<sup>32</sup> PJM Inside Lines, 2025 Year in Review: Planning Prepares for Burgeoning Electricity Demand, January 8, 2026, available at: <https://insidelines.pjm.com/2025-year-in-review-planning-prepares-for-burgeoning-electricity-demand/>. Also see Modo Energy, Data centers define PJM’s 2046 load forecast, undated, available at: <https://modoenergy.com/research/en/pjm-load-forecast-data-centers-2046>, which, using PJM data, finds “The large load component, principally data center additions, accounts for more than 100% of peak demand growth over the next five years as base demand contracts. PJM’s large load adjustments grow by 35.1 GW between 2026 and 2031, against total demand growth of 34.6 GW. Beyond 2031, the balance shifts slightly. The base layer begins to contribute and data center additions decelerate, but remain dominant.”

<sup>33</sup> PJM, 2026 PJM Load Forecast Report, January 14, 2026, at p. 6, available at: <https://www.pjm.com/-/media/DotCom/library/reports-notice/load-forecast/2026-load-report.pdf>. See also Modo Energy, Data centers define PJM’s 2046 load forecast, undated, available at: <https://modoenergy.com/research/en/pjm-load-forecast-data-centers-2046>.

protect PPL's low and moderate income customers from negative cost impacts caused by the interconnection of large load customers.

70. Admitted.

71. Admitted.

72. Admitted. By way of further answer, CAUSE-PA is concerned that PPL's CPTR proposal is insufficient to properly assign all transmission-related costs to the LP-6 rate class that would not be incurred but for the interconnection of large load customers.

73. Denied. CAUSE-PA lacks sufficient knowledge and information at the current stage of the proceeding to ensure that PPL's averment is true and demands strict proof thereof. It is not clear PPL's proposed tariff revisions would ensure that all costs that PPL would not have incurred but for the interconnection of large load customers will be properly allocated to the LP-6 rate class. PPL's Petition would ostensibly implement provisions which would allow for "incremental" transmission-related charges to be attributed to LP-6 customers if caused by (or attributed to) large load customers.<sup>34</sup> However, the proposal would also allow some transmission-related charges to be assessed to all customers, and it remains unclear whether the "incremental" costs identified by PPL will incorporate all costs that would not have been incurred but for the introduction of large load customers onto the system. The delineation of these charges is a critical issue in this proceeding and is not clearly defined in PPL's proposal. As such, CAUSE-PA submits that PPL's proposal does not adequately protect the Company's low and moderate income customers from being subject to costs caused by the introduction of large load customers onto the system.

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<sup>34</sup> PPL Petition, Appendix A, Second Revised Page No. 23A Canceling First Revised Page No. 23A.

74. Admitted in part. CAUSE-PA agrees that the CPTR proposal would provide some level of increased transparency for PPL's customers by including the proposed charge as a line item on the bill. However, CAUSE-PA disagrees that there is sufficient information available that the proposed CPTR would adequately ensure that large load customers pay their fair share of these costs, as discussed above in Paragraph 10.

75. CAUSE-PA lacks information or knowledge sufficient to form a belief about whether the CPTR appearing as a separate line item of PPL's electric service bills would enable customers to better track the impact of these costs on their bills. CAUSE-PA asserts that issues related to customer notice and education related to the cost impacts from large load users is a material issue -- and must be examined through the course of this proceeding.

**D. ADDITIONAL TARIFF REFORMS ARE NECESSARY TO ENSURE THAT PPL'S TARIFF RULES, POLICIES, AND PROCEDURES APPROPRIATELY ASSIGN FUTURE PJM CHARGES, SUCH AS RBP AND IRAS COSTS, ATTRIBUTABLE TO LARGE LOAD CUSTOMERS DIRECTLY TO RATE LP-6.**

76. Admitted. However, it is unclear whether the Commission could approve PPL's CPTR proposal as a means of collecting these costs as bundled with transmission costs, or if a separate non-bypassable charge is necessary. The Public Utility Code and Commission regulations prohibit the bundling of generation supply and transmission rates.<sup>35</sup> PPL indicates that the CPTR could be used to assign RBP and IRAS related costs directly to certain large load customers.<sup>36</sup> Costs incurred under the RBP and IRAS would be generation supply costs rather than transmission costs. By way of further answer, CAUSE-PA fully supports the direct and full assignment of RBP and IRAS costs to LP-6 customers but submits that the question of whether it

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<sup>35</sup> 66 Pa. C.S. §§ 2804(3), 2807(c)(1); 52 Pa. Code § 54.4(b)(3).

<sup>36</sup> Petition at ¶¶ 76-85.

can be done through CPTR or should be accomplished through a separate non-bypassable charge is a question that must be addressed in this proceeding.

77. Admitted.

78. Admitted.

79. Admitted in part; denied in part. CAUSE-PA agrees that PPL's Petition does not prejudice FERC action regarding assignment of costs and is a timely step to ensure the right rules are in place to allocate costs appropriately if and when they are assigned. That said, CAUSE-PA submits that additional tariff reforms are necessary to ensure that RBP costs that are assigned to PPL are properly attributed to large load customers through Rate LP-6, such that PPL's residential customers do not bear any costs that would not have been incurred but for the interconnection of large load users – even if those costs are for upgrades that may provide a secondary benefit to residential customers.

80. Admitted.

81. Admitted.

82. Denied. By way of further answer, CAUSE-PA incorporates its response to Paragraph 76, above.

83. Admitted in part; denied in part. CAUSE-PA admits that PJM's RBP and IRAS proposals are developing rapidly, and that their final design, implementation requirements, and cost-allocation consequences are subject to FERC review. In addition, CAUSE-PA fully supports the direct and full assignment of RBP and IRAS costs to LP-6 customers but submits that the question of whether it can be done through CPTR or should be accomplished through a separate non-bypassable charge is a question that must be addressed in this proceeding. CAUSE-PA

denies the remainder of the allegation in this paragraph for the reasons outlined in response to Paragraph 76, above.

84. Denied. Absent reforms, CAUSE-PA disagrees that the Commission should approve PPL's CPTR proposal as set forth in the underlying Petition in this matter. CAUSE-PA fully supports the direct and full assignment of RBP costs to LP-6 customers but submits that the question of whether RBP costs are adequately assigned to LP-6 customers through CPTR – or another non-bypassable surcharge – is a question that must be addressed in this proceeding.

85. Denied. Absent reforms, CAUSE-PA disagrees that the Commission should approve PPL's CPTR proposal as set forth in the underlying Petition in this matter. CAUSE-PA fully supports the direct and full assignment of IRAS costs to LP-6 customers but submits that the question of whether IRAS costs are adequately assigned to LP-6 customers through CPTR – or a separate non-bypassable surcharge – is a question that must be addressed in this proceeding.

**E. THE COMPANY'S PROPOSED CPTR FAILS TO PROPERLY ADDRESS CUSTOMER AFFORDABILITY AND THE RETAIL COMPETITIVE MARKET.**

86. Denied. CAUSE-PA denies that PPL's CPTR would produce rates which are just, reasonable, and not unduly discriminatory and/or preferential. PPL's CPTR proposal fails to set forth sufficient detail to ensure that all costs inclusive of NITS and other transmission costs, as well as potential BRP and IRAS costs that would not have been incurred but for large load users are not socialized to PPL's existing ratepayers.

87. Admitted in part and denied in part. CAUSE-PA admits that, under PPL's proposal, EGSs would no longer have the obligation, as an LSE, to recover their share of NITS and other transmission costs that would be recovered through the proposed CPTR. However, CAUSE-PA denies that the Company's proposals are sufficient because they fail to set forth a clear methodology for evaluating whether such costs would not have been incurred but for large load

users – or whether it is just and reasonable to allocate any such costs across PPL’s other ratepayers.

88. Admitted in part and denied in part. CAUSE-PA admits that PPL’s proposal is to allocate “all of those costs and recover them from all customers” through the CPTR but denies that this treatment is appropriate as proposed because PPL’s proposed tariff revisions do not set forth sufficient details to ensure that costs which are incurred as a result of large load users are not socialized across PPL’s other ratepayers.

89. Admitted in part; Denied in part. CAUSE-PA agrees that, by eliminating this EGS obligation, PPL’s proposal may reduce the risk profiles for EGSs operating in PPL’s service territory. However, CAUSE-PA disagrees that it is appropriate to do so through the present proposal, as PPL’s Petition lacks meaningful details to ensure that PPL’s low and moderate income customers are protected against NITS and other transmission costs as a result of large load users.

90. Admitted in part; Denied in part. CAUSE-PA agrees that EGSs currently often include a premium in their prices to hedge for the uncertainty of NITS and other transmission charges. CAUSE-PA denies that these pricing premiums can be eliminated through the Company’s proposal.

91. Denied. The extent to which PPL’s proposal would “de-risk” EGS offerings and improve customer affordability is necessarily connected to whether PPL’s proposal would sufficiently ensure that transmission costs are properly assigned to Rate LP-6 customers.

**F. PPL'S CTPR PROPOSAL SHOULD BE DENIED, AND PPL SHOULD NOT BE DIRECTED TO TAKE STEPS TO IMPLEMENT THIS PROPOSAL, ABSENT SIGNIFICANT REFORMS TO THE PROPOSED CPTR.**

92. Denied. Absent significant reforms to PPL's Petition, and the proposals contained therein, the Commission should deny PPL's proposals and should not allow PPL to take additional steps to implement the same.

93. Denied. Absent significant reforms to PPL's Petition, and the proposals contained therein, the Commission should deny PPL's proposals and not allow PPL to take additional steps to implement the same.

94. Denied. CAUSE-PA fully supports the assignment of administrative and implementation costs related to the CPTR to Rate LP-6 customers, including the costs that PPL sets forth in Paragraph 94 of its Petition. However, PPL's Petitions fails to set forth provisions which would ensure that PPL's existing customers would not be held responsible for all costs that would not have been incurred but for large load users.

95. Denied. CAUSE-PA lacks sufficient information to know how and whether PPL will undertake the averments contained in this Paragraph.

96. Denied. CAUSE-PA denies that the Commission should approve PPL's Petition, absent significant reforms, with an effective date in the first quarter of 2028. CAUSE-PA lacks information or knowledge sufficient to form a belief whether PPL's proposed timeframe would provide EGSs sufficient time to make necessary contract adjustments to implement PPL's proposal.

97. The allegations set forth in Paragraph 97 of PPL's Petition are legal conclusions to which no response is required.

**G. PPL'S PROPOSED CPTR FAILS TO ALIGN WITH COMMISSION PRECEDENT.**

98. The allegations set forth in Paragraph 98 of PPL's Petition are legal conclusions to which no response is required.

99. The allegations set forth in Paragraph 99 of PPL's Petition are legal conclusions to which no response is required.

100. The allegations set forth in Paragraph 100 of PPL's Petition are legal conclusions to which no response is required.

101. The allegations set forth in Paragraph 101 of PPL's Petition are legal conclusions to which no response is required.

102. Admitted.

103. Admitted in part; denied in part. CAUSE-PA admits and agrees that recent growth of large load users, and resulting affordability concerns, require further reforms to PPL's existing tariff provisions. CAUSE-PA continues to disagree that PPL's Petition should be approved absent significant reforms to ensure that low and moderate income customers are protected from costs which would not have been incurred but for the interconnection of large load users.

**H. PPL'S REQUEST FOR WAIVERS TO IMPLEMENT ITS CPTR PROPOSAL SHOULD BE DENIED.**

104. Admitted.

105. Admitted.

106. Admitted. CAUSE-PA supports exclusion from the Price to Compare (PTC) any CPTR or similar non-bypassable charge that is ultimately approved by the Commission as a result of this proceeding.

107. CAUSE-PA is without sufficient knowledge or information to form an opinion about whether PPL's proposed changes would disturb the structural components of customer-generators' banked excess generation.

108. Admitted in part; denied in part. CAUSE-PA admits that certain structural components for Rate GSC-2 are entailed in PPL's Commission approved Settlement at Docket Nos, R-2025-3057164, et al. By way of further answer, CAUSE-PA incorporates its response to paragraph 107 above.

109. CAUSE-PA incorporates its response to Paragraph 107 above.

110. CAUSE-PA incorporates its response to Paragraph 107 above.

**IV. ANY CHANGES TO PPL'S TARIFFS MUST BE ACCOMPANIED BY ROBUST CUSTOMER NOTICE.**

111. CAUSE-PA lacks information or knowledge sufficient to form a belief about the extent of public notice PPL will ultimately provide related to its filing, or whether that notice will be sufficient to inform customers about their rights related thereto.

112. Admitted.

113. Admitted.

114. CAUSE-PA lacks information or knowledge sufficient to form a belief about the extent to which PPL will publish notice of its Petition, or whether that notice will be sufficient to inform customers about their rights related thereto.

115. Admitted.

116. Admitted. CAUSE-PA agrees that the Commission should publish notice of PPL's filing in the Pennsylvania Bulletin and that a reasonable deadline for intervention be set in that notice.

117. Denied. CAUSE-PA asserts that public input hearings are necessary in this proceeding to ensure that impacted consumers are afforded a reasonable opportunity to participate, and that

robust notice and information about PPL's proposal and the opportunity to participate through the public input process is essential to adequately inform the public of their rights related thereto.

118. Admitted. CAUSE-PA supports robust notice related to PPL's Petition, and sufficient time for interested individuals to comment or seek intervention in this proceeding. In addition, we believe public input hearings should be held to ensure that members of the public are able to meaningfully engage in the proceeding without incurring the cost and expense to formally intervene.

WHEREFORE, CAUSE-PA asserts that these matters, as well as any additional issues that may arise through the course of this proceeding, must be thoroughly reviewed and investigated to ensure that low and moderate residential customers are protected from all costs caused by or otherwise related to the interconnection of large load customers onto the system. CAUSE-PA respectfully requests that the Commission refer this matter to the OALJ for further investigation and the creation of a detailed record, and enter an order granting CAUSE-PA full status as an intervenor in this proceeding with active party status.

Respectfully submitted,

**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*



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Date: October 5, 2026

### **Verification**

I, **Elizabeth R. Marx**, legal counsel for CAUSE-PA, on behalf of CAUSE-PA, hereby states that the facts contained in the foregoing pleadings are true and correct to the best of my knowledge, information, and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

A handwritten signature in blue ink, reading "Elizabeth R. Marx", is positioned above a horizontal line.

Elizabeth R. Marx, Esq.  
*On behalf of the Coalition for Affordable Utility  
Services and Energy Efficiency in Pennsylvania*

Dated: October 5, 2026

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|                                            |   |                           |
|--------------------------------------------|---|---------------------------|
| Petition of PPL Electric Utilities         | : | Docket No. P-2026-3065185 |
| Corporation for Approval of Its Non        | : |                           |
| Bypassable Customer Protection             | : |                           |
| Transmission Rider, Elimination of Its     | : |                           |
| Transmission Service Charge, Changes to    | : |                           |
| Its Generation Supply Charges, Changes to  | : |                           |
| Its Retail Tariff, and Changes to Electric | : |                           |
| Generation Supplier Coordination Tariff    | : |                           |
|                                            | : |                           |
| Petition of PPL Electric Utilities         | : | Docket No. P-2024-3047290 |
| Corporation for Amendment of Its Default   | : |                           |
| Service Program and Procurement Plan for   | : |                           |
| the Period June 1, 2025, through May 31,   | : |                           |
| 2029                                       | : |                           |
|                                            | : |                           |
| Petition of PPL Electric Utilities         | : | Docket No. P-2026-3065186 |
| Corporation for Waiver of Any and All      | : |                           |
| Regulations Necessary to Implement the     | : |                           |
| Company's Proposals                        | : |                           |

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**Certificate of Service**

I hereby certify that I have this day served copies of the **Petition to Intervene and Answer of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

**VIA EMAIL ONLY**

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A handwritten signature in black ink, appearing to read "Ria Pereira", is positioned above a horizontal line.

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