



October 7, 2026

VIA E-File Only

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

Re: Pennsylvania Consumer Advocate v. PPL Electric Utilities Corporation
Docket No. C-2026-3065756

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 dark ink, appearing to read "Ria Pereira", is written over a light grey 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)
Office of Special Assistants (email only, ra-OSA@pa.gov)
Paul Diskin, TUS (email only, pdiskin@pa.gov)
Darren Gill, TUS (email only, dgill@pa.gov)

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Consumer Advocate

v.

PPL Electric Utilities Corporation

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:
:

Docket No. C-2026-3065756

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

PENNSYLVANIA UTILITY LAW PROJECT

Counsel for CAUSE-PA

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October 7, 2026

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, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby submits its Petition to Intervene and files its Answer in the captioned proceeding. In support thereof, CAUSE-PA states as follows:

1. On October 2, 2026, the Office of Consumer Advocate (OCA) filed a Formal Complaint (herein, Complaint) regarding the justness and reasonableness of PPL Electric Utilities Corporation’s (PPL) existing rates and service in relation to the interconnection of large load customers in PPL’s service territory.¹

2. In its Complaint, the OCA explains that, over the next five years, total energy usage in PPL’s service territory is projected to increase by an average annual rate of 20.51% – largely as a result of the onboarding of large load customers (namely, hyperscale data centers), referred to herein as computational load entities (CLEs).² As data centers continue to interconnect to PPL’s systems, significant challenges have arisen and will continue to grow.³

3. OCA argues that PPL’s existing tariff rates, rules, and regulations are unjust, unreasonable, and/or unduly discriminatory and/or preferential.⁴ OCA further argues that PPL’s existing service is unreliable, unreasonable, inadequate, and/or unduly discriminatory and/or preferential because it causes existing consumers to inappropriately bear the risks and consequences of (1) paying for new and higher costs as a result of data centers; and (2) receiving service that is “frequently interrupted or curtailed due to strains placed on electricity

¹ Formal Complaint Regarding PPL Electric Utilities Corporation’s Existing Rates and Service in Relation to Additions of Data Centers to the Utility’s Electric Distribution System and the PJM Region, Docket No. C-2026-3065756.

² OCA Complaint at ¶ 16.

³ OCA Complaint at ¶ 2.

⁴ OCA Complaint at p. 2.

transmission infrastructure and generation supply as a result of the fast-paced interconnections of and service to data centers without PPL Electric taking preventative steps to ensure that either there is sufficient new supply to meet the new data center demand or there is the provision of mandatory interruptible service to data center customers during pre-emergency and emergency conditions, as appropriate.”⁵

4. In support of its arguments, OCA alleges that: ⁶

- a. PPL’s existing tariff does not establish a new customer classification for rates and service applicable only to data centers to appropriately address the cost impact risks and reliability impacts to service risks presented by the ongoing additions of data centers to PPL Electric’s system and the PJM region, 66 Pa. C.S. Sections 1301-1304, 1501-1502;
- b. PPL’s existing tariff omits mandatory interruptible service rate schedules and implementing tariff operating procedures that are necessary to protect existing customers from experiencing emergency forced customer outages due to the ongoing and foreseeable impacts to reliable service caused by data center additions to PPL’s system and the PJM region, 66 Pa. C.S. Sections 1301-1304, 1501-1502, 2803, 52 Pa. Code Section 57.52;
- c. PPL’s tariff omits sufficient and adequate operating rules and interconnection terms and conditions to protect existing customers from experiencing emergency forced customer outages due to the ongoing and foreseeable impacts to reliable service caused by data center additions to PPL’s system and the PJM region, 66 Pa. C.S. Sections 1301 1304, 1501-1502, 2803, 2805(a), 2807(a), 52 Pa. Code Section 57.52;
- d. PPL has failed to take reasonable steps to ensure the continued provision of service without unreasonable interruption or outages to its existing customers, particularly its most vulnerable customers, despite known and impending resource inadequacy and transmission constraints that could compromise service as early as July 1, 2027, 66 Pa. C.S. Sections 1501-1502, 52 Pa. Code Sections 57.19, 57.52, 57.194(d);
- e. PPL’s tariff omits specific provisions to ensure that transmission and distribution incremental investments caused by data center interconnections as well as the data centers’ fair share of embedded costs related to the utility’s local transmission

⁵ OCA Complaint at pp. 1-2; ¶ 245. 66 Pa. C.S. §§ 1301-1304, 1501-1502, 2805(a), 2807(a), (e).

⁶ OCA Complaint at pp. 3-4.

system will be paid for by the data centers, 66 Pa. C.S. Sections 1301-1304, 2807(e);

- f. PPL's tariff omits specific provisions to ensure that default service and shopping customers are not subsidizing PJM capacity, Reliability Backstop Procurement (RBP), Interim Resource Adequacy Service (IRAS) costs caused by data centers, 66 Pa. C.S. Sections 1301-1304, 2807(e);
- g. PPL Electric's Rate LP-6 omits sufficient rules and regulations to prevent cost shifting and the shifting of stranded costs risks from data centers onto other ratepayers, 66 Pa. C.S. Sections 1301-1304; and
- h. PPL Electric's tariff omits sufficient provisions and PPL has failed to take reasonable steps to prevent exacerbating affordability challenges for residential customers or to adequately protect eligible low-income customers from the costs and affordability impacts associated with rapid data-center load growth, including through adequate universal service fund contributions, 66 Pa. C.S. Sections 1301-1304.

5. CAUSE-PA files this Petition to Intervene and Answer in support of OCA's

Complaint and because it is highly concerned about the cost and reliability impacts that CLEs will continue to have on PPL's low and moderate income customers.

6. Without meaningful reforms to PPL's tariff provisions related to CLEs, PPL's low and moderate income customers will be subject to categorically unjust, unreasonable, unduly discriminatory and/ or preferential rates and terms and conditions of service, which are in violation of Sections 102, 1301-1304, 1309, and 1501-1502 of the Public Utility Code.

7. To protect low income customers and other vulnerable customer groups from further harm, CLEs must be held responsible for all costs that would not be incurred but for the interconnection of these entities to PPL's electric system.

8. CAUSE-PA urges the Commission to require PPL to revise its retail and supplier tariffs, and attendant policies and procedures, to address the affordability and reliability impacts that CLEs have had, and will continue to have, on PPL's low and moderate income residential

customers, including through the direct assignment of universal service costs to CLEs to address the continued costs impacts as a result of these customers.

9. CAUSE-PA also urges that Commission to look at the array of other ways in which low and moderate income customers are impacted by the increased costs associated with actual and projected computational large loads including but not limited to increased terminations rates, increased arrearages, and other economic hardships.

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 Trippls 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 the present proceeding will have on moderate and low income residential customers. These interests are not adequately represented by other participants in this proceeding.

17. CAUSE-PA has members in the PPL's service territory and has a significant interest in protecting its members from existing harm caused by the interconnection of CLEs onto PPL's system and preventing the cascade of negative consequences to PPL's low and moderate income customers. The interconnection of CLEs has already and will continue to impact PPL's rates, quality of services, and terms and conditions of service – disproportionately impacting moderate and low income residential customers, driving higher debts, higher rates of termination, housing insecurity, health consequences, and other associated harms. CAUSE-PA asserts that other participants in this proceeding do not adequately represent these interests.

18. 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 service, the cost impacts of CLEs on customer's utility bills, and the reliability and quality of service for customers as CLEs continue to interconnect to PPL's system.

19. CAUSE-PA has a significant interest in protecting its members from harm caused by the interconnection of CLEs onto PPL's system and preventing the cascade of negative consequences to PPL's low and moderate income customers.

20. In addition, CAUSE-PA was an active party to PPL's last base rate proceeding, through which the Commission authorized PPL to implement its LP-6 tariff provisions related to large load users.⁷ CAUSE-PA was also an active party in PPL's last Default Service Program (DSP) proceeding;⁸ PPL's recent Act 129, Phase V proceeding;⁹ and PPL's last Universal Service and Energy Conservation Plan proceeding.¹⁰ CAUSE-PA has a significant interest in the impact of OCA's requested relief set forth in this proceeding, as the outcome of this proceeding will impact settlements and orders from these prior proceedings.

21. 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.

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

Ria M. Pereira, Esq., PA ID: 316771
Levi A. Phillips, Esq., PA ID: 338477
Elizabeth R. Marx, Esq., PA ID: 309014
John W. Sweet, Esq., PA ID: 320182
Lauren N. Berman, Esq., PA ID: 310116
Pennsylvania Utility Law Project

⁷ PA PUC v. PPL, Docket Nos. R-2025-3057164; et al.

⁸ 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.

⁹ Petition of PPL Electric Utilities Corporation for Approval of Its Act 129 Phase V Energy Efficiency and Conservation Plan, Docket No. M-2025-3057329.

¹⁰ PPL Electric Utilities Corporation Universal Service and Energy Conservation Plan for 2023-2027 Submitted in Compliance with 52 Pa. Code § 57.74; Docket No. M-2022-3031727.

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23. Counsel for CAUSE-PA consents to the service of documents by electronic mail to pulp@pautilitylawproject.org, as provided in 52 Pa. Code § 1.54(b)(3).

Answer

24. CAUSE-PA has preliminarily reviewed OCA's Complaint and strongly supports OCA's requested relief contained therein. PPL's Retail and Supplier Tariff provisions, rules, and policies, fail to meaningfully account for increased interconnections of CLEs to PPL's system, and the cost and reliability impacts of increased interconnections on the affordability and reliability of services for low and moderate income customers.

25. Absent significant reforms in line with the requested relief contained in OCA's Complaint, PPL's low and moderate income customers will be subject to rates and terms and conditions of service that are unjust, unreasonable, unduly discriminatory and/ or preferential, and otherwise violate Sections 102, 1301-1304, 1309, and 1501-1502 of the Public Utility Code.

26. CAUSE-PA agrees with OCA that PPL's current Retail and Supplier Tariffs are unjust, unreasonable, unduly discriminatory and/ or preferential, and otherwise violate 66 Pa. C.S. Sections 102, 1301-1304, 1501-1502, 2803, and 2807(e) of the Public Utility Code because they fail to include adequate safeguards to protect PPL's residential customers, including low and moderate income customers, from excessive rates, reliability risks, and a cascade of resulting consequences to health and safety caused by the interconnection of data centers and other CLE customers. CAUSE-PA has reviewed PPL's existing tariffs, and submits that the rates and terms and conditions contained therein result in unjust and unreasonable service by:

- a. Failing to establish tariff provisions to ensure that CLEs are responsible for all costs which would not have been incurred but for these users (“but-for” costs) in a manner that is just, reasonable, and not unduly discriminatory or preferential;¹¹
- b. Failing to set forth sufficient tariff provisions to protect low and moderate income customers from the costs and affordability impacts from data center load growth;¹²
- c. Failing to set forth sufficient tariff provisions, and associated rules and policies, to protect low and moderate income customer enrolled in PPL’s universal service programs, including its Customer Assistance Program (CAP), from costs associated with CLEs;
- d. Failing to set forth sufficient tariff provisions, and associated rules and policies, to protect against the additional costs to PPL’s universal service programs, including its CAP, from CLEs – the costs of which are borne by PPL residential customers and, effective January 1, 2027, from LP-6 customers;
- e. Failing to provide adequate protections for eligible low income customers to address affordability impacts from CLEs, including but not limited to adequate identification and tracking of confirmed low income customers, compliance with applicable Commission requirements, and an adequate Universal Service Fund contribution;¹³
- f. Omitting a separate rate classification for CLEs in PPL’s Retail Tariff which addresses data centers’ unique nature, and the cost and reliability risks from these users to PPL’s low and moderate income customers;¹⁴
- g. Failing to establish sufficiently specific requirement for CLEs to pay all costs that would not have been incurred but for their load – inclusive of directly assigned and allocated distribution and transmission costs which may otherwise be recovered through Network Integration Transmission Service (NITS) or other wholesale charges that are allocated to retail customers.¹⁵
- h. Failing to condition retail service on protections that prevent the federally allocated transmission costs from producing retail cost shifting to other PPL customers, including low and moderate income customers;¹⁶
- i. Omitting broad cost responsibility, reporting, and change-in-rules provisions that remain durable as PJM and FERC rules evolve so that consumer protections continue to function as PJM implements its proposed Reliability Backstop

¹¹ OCA Complaint at ¶¶ 181, 186.

¹² OCA Complaint at Sections F.VIII, F. IX.

¹³ OCA Complaint at ¶¶ 237-243.

¹⁴ OCA Complaint at ¶¶ 124-126.

¹⁵ OCA Complaint at ¶ 181.

¹⁶ OCA Complaint at ¶ 188.

Procurement (RBP), its Interim Resource Adequacy Service (IRAS), forecasting reforms, interconnection reforms, or related market changes;¹⁷

- j. Omitting specific tariff provisions to ensure that default service and shopping customers are not subsidizing capacity, RBP, IRAS costs caused by data centers;¹⁸
- k. Omitting sufficient provisions to prevent cost shifting and the shifting of stranded costs risks from data centers onto other PPL's other ratepayers;
- l. Omitting requirements that ensure that CLEs have made sufficiently non-speculative commitments before PPL undertakes substantial investments and costs to serve these customers.¹⁹

27. CAUSE-PA further agrees with OCA that PPL's Retail and Supplier Tariffs are unjust, unreasonable, unduly discriminatory and/ or preferential, and otherwise violate Sections 102, 1301-1304, 1501-1502, 2803, 2805(a), 2807(a) of the Public Utility Code because they fail to protect the quality and reliability of services for low and moderate income customers. CAUSE-PA has reviewed PPL's existing tariffs, and submits that the rates and terms and conditions contained therein result in unjust and unreasonable service by:

- a. Failing to set forth sufficient provisions and rate schedules to protect low and moderate income customers from experiencing degradation in service quality, including emergency forced customer outages;²⁰
- b. Clear guidelines to separate critical and noncritical load, and clearly defined schedules related to load shedding priorities based on an assignment of critical load status, which would protect existing customers, including residential customers, from degradation of service reliability and quality;²¹
- c. Failing to set forth clear provisions for interruptible rate customers, with clear tariff provisions about when service interruptions would be triggered, in a manner that would protect the quality and reliability of service for PPL's low and moderate income customers;²²

¹⁷ OCA Complaint at ¶¶ 200-204.

¹⁸ OCA Complaint at pp. 1-2; Section F.VI; ¶ 194.

¹⁹ OCA Complaint at ¶¶ 216-217.

²⁰ OCA Complaint at ¶¶ 131-146.

²¹ OCA Complaint at ¶¶ 151, 157-177.

²² OCA Complaint at ¶¶ 131-146.

- d. Failing to establish penalties for non-compliance with PPL's reliability orders to curtail load for CLEs subject to interruptible rates;²³
- e. Permitting the interconnection of new data centers without determining that proposed load can be served reliably and without degrading electric utility service to existing customers.²⁴

28. Continued delivery of safe, affordable electric service is of critical importance to the safety, welfare, and economic stability of all Pennsylvanians – particularly those with limited financial means. In recognition of this fact, the law requires that electric distribution companies develop, maintain, and appropriately fund universal service programs, such as PPL's Customer Assistance Program (CAP) to assist low income and other vulnerable customers to maintain service to their homes.²⁵

29. Preliminary review of OCA's Complaint and PPL's Retail and Supplier Tariffs suggests that PPL fails to set forth provisions which would protect PPL's residential customers, including low income customers, from increased unaffordability because of increased costs to PPL's universal service programs as a result of large load users.

30. PPL's tariff provides for a fixed annual allocation of Universal Service Rider (USR) costs to Rate LP-6 in the amount of \$11 million.

31. PPL's tariff provisions fail to account for increases to USR costs over time as a result of CLE customers. For example, this allocation does not vary with customer contracted demand amounts and is not indexed for inflation or overall universal service cost amounts.²⁶ Similarly, LP-6 USR contributions are inconsistent with the Commission's Model Tariff Policy, as they are not based on customer peak demand.²⁷

²³ OCA Complaint at ¶¶ 140; 145.

²⁴ OCA Complaint at ¶¶ 149.

²⁵ 66 Pa. C.S. §§ 2803, 2804(9).

²⁶ OCA Complaint at ¶¶ 238-239.

²⁷ OCA Complaint at ¶¶ 238-239.

32. PPL's \$11 million fixed annual USR allocation is also based on 2025 load projections, and may no longer be sufficient as CLE demand and associated costs grow.²⁸

33. CAUSE-PA asserts that further investigation related to continued increases to universal service costs, and the appropriate allocation to CLEs as a result of the same, is necessary through the course of the proceeding.

34. Similarly, preliminary review of PPL's tariff provisions reveal that these provisions lack safeguards for low income customers enrolled in PPL's Customer Assistance Program (CAP) as a result of the increase in costs caused by CLEs. Without adequate safeguards, PPL's low income CAP customers will continue to face higher rates and, in turn, will exceed the maximum CAP credit threshold at greater rates – exposing CAP participants to higher risk of program default and termination.²⁹ Exposing CAP participants to this heightened level of risk is unjust, unreasonable, unduly discriminatory and/or preferential rates.

35. CAUSE-PA asserts that these matters, along with issues set forth throughout OCA's Complaint in this proceeding and any additional issues raised by intervening parties, must be thoroughly reviewed and investigated to ensure that PPL's low and moderate income customers are protected from the continued impacts of large load customers and so that they can access reliable, safe, and affordable electric services.

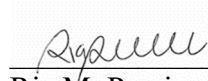
WHEREFORE, CAUSE-PA respectfully requests that the Commission enter an order granting CAUSE-PA full status as an intervenor in this proceeding with active party status.

²⁸ OCA Complaint at ¶¶ 238-239.

²⁹ PPL Electric, Universal Service and Energy Conservation Plan (USECP), 2023-2027, at 13-14, available at: 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.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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Date: October 7, 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 7, 2026

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Consumer Advocate	:	
	:	
v.	:	Docket No. C-2026-3065756
	:	
PPL Electric Utilities Corporation	:	

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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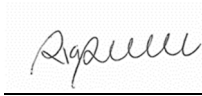
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