
Devin Ryan

dryan@postschell.com
717-612-6052 Direct
717-731-1985 Direct Fax
File #: 220625

October 8, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
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

Dear Secretary Homsher:

Attached for filing please find the Unopposed Motion for Extension of Time to File Responsive Pleadings of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DR/tc
Attachment

cc: The Honorable Charles E. Rainey, Jr. (*via email w/attachment*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA EMAIL

Allison Kaster, Esq.
PA Public Utility Commission
Bureau of Investigation & Enforcement
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265
E-mail: akaster@pa.gov
(Counsel for I&E)

Melanie Joy El Atieh, Esq.
Olivia M. Spergel, Esq.
Johnathan Longhurst, Esq.
Katherine “Katie” M. Kennedy, Esq.
Jacob Guthrie, Esq.
Ryan Morden, Esq..
Crystal M. Zook, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101
E-mail: melatieh@paoca.org
E-mail: ospergel@paoca.org
E-mail: jlonghurst@paoca.org
E-mail: kkennedy@paoca.org
E-mail: jguthrie@paoca.org
E-mail: rmorden@paoca.org
E-mail: czook@paoca.org
E-mail: OCAPPL1309@paoca.org
(Attorneys for OCA)

Ria M. Pereira, Esq.
Levi A. Phillips, Esq.
Elizabeth R. Marx, Esq.
John W. Sweet, Esq.
Lauren N. Berman, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
E-mail: pulp@pautilitylawproject.org
(Attorneys for CAUSE-PA)

NazAarah Sabree, Esq.
Small Business Advocate
Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
E-mail: ra-sba@pa.gov
(Counsel for OSBA)

Dated: October 8, 2026


Devin Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

The Office of Consumer Advocate,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2026-3065756
	:	
PPL Electric Utilities Corporation	:	
	:	
Respondent.	:	

**UNOPPOSED MOTION OF PPL ELECTRIC UTILITIES CORPORATION FOR
EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS**

Pursuant to 52 Pa. Code §§ 1.15(a)(1) and 5.103, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), by its counsel, hereby requests that the Pennsylvania Public Utility Commission (“Commission”) extend the current due date to file responsive pleadings to the above-captioned Formal Complaint of the Office of Consumer Advocate (“OCA”) by seven calendar days (i.e., from October 26, 2026, to November 2, 2026). In support thereof, PPL Electric represents as follows:

1. On October 6, 2026, the Commission electronically served PPL Electric with the above-captioned Formal Complaint. Under the Commission’s regulations, any PPL Electric responsive pleadings to the Formal Complaint would be due within 20 days (i.e., by October 26, 2026). *See* 52 Pa. Code §§ 5.61(a), 5.101(d).

2. On October 7, 2026, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) filed a combined Petition to Intervene and Answer to the Formal Complaint.

3. OCA's Formal Complaint "generally alleg[es] that PPL Electric's exiting [sic] tariff rates, rules, and regulations are unjust, unreasonable, and/or unduly discriminatory or preferential and existing service is unreliable, unreasonable, inadequate, and/or unduly discriminatory or preferential" with respect to the purported rate and service impacts of data centers. Formal Complaint, pp. 1-2.

4. To prepare any responsive pleadings, PPL Electric evaluate and address 260 paragraphs of allegations contained in the Formal Complaint, as well as six affidavits totaling over 320 pages attached to the Complaint.

5. In addition, counsel for PPL Electric has competing deadlines and required appearances between the date the Formal Complaint was served and the date such responsive pleadings would be due.

6. Before filing this Motion, counsel for PPL Electric contacted counsel for OCA and CAUSE-PA to see if they would object to a one-week extension of time to file responsive pleadings to the Formal Complaint.

7. PPL Electric can represent that neither OCA nor CAUSE-PA opposes the requested extension.

8. Section 1.15(a)(1) of the Commission's regulations states:

[W]henever under this title or by order of the Commission, or notice given thereunder, an act is required or allowed to be done at or within a specified time, the time fixed or the period of time prescribed may, by the Commission, the presiding officer or other authorized person, for good cause be extended upon motion made before expiration of the period originally prescribed or as previously extended.

52 Pa. Code § 1.15(a)(1).

9. As such, the Commission, the presiding officer or other authorized person, may grant a request for an extension of time, prior to the originally prescribed deadline, upon a showing of “good cause.”

10. Good cause for the requested extension exists because it will provide PPL Electric with additional, necessary time to respond to the Formal Complaint.

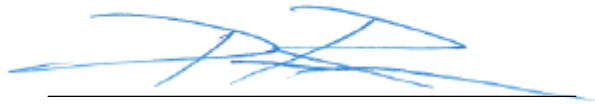
11. The requested extension also will avoid certain conflicts for PPL Electric’s counsel.

12. In addition, this Motion is PPL Electric’s first request for an extension of time in this matter, the request will not unnecessarily delay this matter, and PPL Electric’s request is not opposed by OCA or CAUSE-PA.

13. For these reasons, PPL Electric submits good cause exists for the requested one-week extension and that such extension will help secure the just, speedy and efficient determination of the above-captioned matter.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that Pennsylvania Public Utility Commission, the presiding officer, or another authorized person grant this Motion and extend the time for PPL Electric Utilities Corporation to file any responsive pleadings to the above-captioned Formal Complaint until November 2, 2026.

Respectfully submitted,



Michael J. Shafer (ID # 205681)
PPL Services Corporation
645 Hamilton Street, Suite 700
Allentown, PA 18101
Phone: 610-774-2599
Fax: 610-774-6726
E-mail: mjshafer@pplweb.com

Devin T. Ryan (ID # 316602)
Hayley E. Wilburn (ID # 336055)
Emily Grecu (ID # 337777)
Post & Schell, P.C.
One Oxford Centre
301 Grant Street, Suite 3010
Pittsburgh, PA 15219
Phone: 717-612-6052
E-mail: dryan@postschell.com
E-mail: hwilburn@postschell.com
E-mail: egrecu@postschell.com

David B. MacGregor (ID # 28804)
Lindsay A. Berkstresser (ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: lberkstresser@postschell.com

Date: October 8, 2026

Attorneys for PPL Electric Utilities Corporation