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October 23, 2026

Via Electronic Filing
Matthew Homsher, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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-2026-3065186, P-2024-3047290

Dear Secretary Homsher:

Enclosed for electronic filing is the Petition to Intervene and Answer of Retail Energy Supply Association ("RESA"), to the Petition filed by PPL Electric Utilities Corporation in the above-referenced proceeding.

Copies are being served in accordance with the attached Certificate of Service.

Sincerely,

Deanne M. O'Dell

DMO/dmc

cc: The Honorable John M. Coogan (*via email; w/attachment*)
The Honorable Erin L. Gannon (*via email; w/attachment*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of RESA Petition to Intervene, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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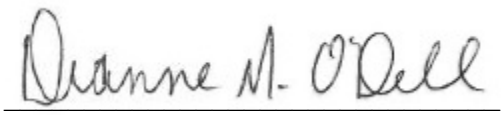
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Date: October 23, 2026

Deanne O'Dell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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-2026-3065186 P-2024-3047290

THE RETAIL ENERGY SUPPLY ASSOCIATION'S PETITION TO INTERVENE AND ANSWER

Pursuant to 52 Pa. Code §§ 5.72-5.74 and the public notice published in the *Pennsylvania Bulletin* establishing October 23, 2026 as the filing deadline for petitions to intervene and answers, the Retail Energy Supply Association ("RESA")[1] petitions to intervene in the above captioned Petition filed by PPL Electric Utilities Corporation ("PPL").

As discussed below, RESA has a direct and substantial interest in this proceeding because PPL's proposal would change the transmission costs, billing obligations, contracts, products and risk-management responsibilities of Electric Generation Suppliers ("EGSs") serving PPL customers. RESA therefore requests that the Commission grant its intervention.

[1] The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

Because the proceeding is at an early stage and the proposed changes raise both competitive-market and implementation questions, RESA submits this limited Answer without taking a final position on the merits of PPL's proposal.

I. PETITION TO INTERVENE

1. RESA is a trade association whose members include EGSs licensed to serve customers in Pennsylvania, including customers in PPL's service territory. RESA members currently recover or manage NITS and other transmission costs through their retail supply arrangements and contracts with shopping customers.

2. RESA's attorneys in this matter are:

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3. The Commission's regulations allow intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A "person" includes a corporation and an association. 52 Pa. Code § 1.8.

4. RESA meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). PPL proposes to:

- recover NITS and certain other transmission costs through a non-bypassable charge applicable to shopping and default-service customers; (Petition at 2, 4–5.)
- allocate certain network-upgrade costs to Rate LP-6 customers; (Petition at 2–4.)
- eliminate the existing Transmission Service Charge; (Petition at 2, 5.)
- move certain remaining transmission costs into Generation Supply Charges; (Petition at 2, 5.)
- establish a mechanism for recovering future RBP and IRAS charges or credits that are ultimately assigned to PPL and properly attributable to Rate LP-6 customers; (Petition at 5–6.) and
- amend PPL's Retail Tariff, Supplier Tariff and Default Service Program. (Petition at 2.).

5. As an organization whose members include competitive electric generation suppliers ("EGSs") licensed to do business in the Company's service territory, RESA has interests that will be directly affected by this proceeding.[2] The changes proposed by PPL could affect EGS payment obligations, retail contracts, product offerings, billing and EDI processes, customer disclosures, and the ability of suppliers and customers to negotiate the treatment of transmission and reliability risks. They may also affect existing contracts that already include NITS or other covered costs and contracts being priced for future delivery. (Petition at 4–7.)

6. RESA's interests in this proceeding are unique from and not adequately represented by other parties that may seek to intervene, including individual EGSs or other organizations interested in electric competition in Pennsylvania in general and in the Company's service territory in particular. This is because RESA represents the interests of a diverse and broad group of electric generation suppliers in general, and not the interests of any individual member.

[2] *See Respond Power, LLC v. Pa. Public Utility Commission*, 250 A.3d 547 (Pa. Cmwlth. 2021).

7. RESA's participation is also in the public interest. The Commission's decision may establish precedent concerning whether costs and risks historically managed through competitive supply arrangements would instead be recovered through a mandatory utility charge. RESA's participation will assist the Commission in evaluating competitive neutrality, customer choice, cost allocation and implementation issues.

8. RESA is reviewing the Company's filing and will be identifying issues to be addressed in this proceeding. Due to the early stage of this proceeding, RESA reserves the right to raise and address issues identified through its continued review and analysis of the Company's filing (and related information), or other issues raised by other parties.

II. ANSWER TO PETITION

A. The CPTR's proposed treatment of NITS and other transmission costs requires investigation.

9. RESA recognizes that PPL's proposal would change the current allocation and recovery of NITS and other transmission costs. (Petition at 4–5.) PPL currently recovers its allocated costs from default-service customers through the Transmission Service Charge, while EGSs recover their allocated costs through retail supply arrangements with shopping customers. (Petition at 4–5.)

10. PPL proposes to eliminate that structure and recover covered costs through a non-bypassable CPTR. (Petition at 4–5.) RESA does not yet have sufficient information to determine whether the proposal is just, reasonable and consistent with Pennsylvania's competitive-market structure. The Commission should examine, among other things:

- the precise PJM charges, credits and obligations that would transfer to PPL;
- the obligations that would remain with EGSs;
- whether the CPTR would affect supplier products, risk management or customer negotiations;
- whether the proposal would create competitive-neutrality concerns;

- how the CPTR would be treated in the Price to Compare; and
- whether the proposed structure would affect market-based services, including demand response, virtual power plant arrangements and other supplier-managed risk-management products. *See* Petition at 6 (stating PPL's expectation that removing transmission-cost responsibility from EGSs would reduce EGS risk profiles and affect competitive supply offers).

B. The proposed treatment of large-load costs requires clear cost-causation standards.

11. PPL proposes to establish a mechanism for recovering future RBP and IRAS charges or credits that are ultimately assigned to PPL and properly attributable to Rate LP-6 customers. (Petition at 5–6.) RESA recognizes that cost causation is an important issue for examination, including whether large-load customers should bear the incremental costs and risks they cause. RESA will need to examine how the Petition's proposed "but-for" cost and attribution concepts would operate, including how embedded transmission costs, intra-class allocations, RBP charges, IRAS charges and related credits would be identified and assigned. *See* Petition at 3–6.

12. The Commission should examine whether clear, transparent and administrable standards are needed to prevent cost shifting among LP-6 customers, to other customer classes, or to EGSs and shopping customers.

C. Transition and implementation issues require examination.

13. PPL acknowledges that shopping customers may have existing EGS contracts that include NITS or other transmission costs that could also be recovered through the CPTR. (Petition at 6.) RESA believes the Commission should examine transition protections carefully to avoid duplicative recovery while respecting existing contractual rights and obligations. Therefore, the Commission should address treatment of:

- existing contracts extending beyond the CPTR's effective date;
- contracts being priced or executed before implementation;

- customer disclosures and contract modifications;
- supplier billing and EDI changes;
- reconciliation and true-up mechanisms; and
- the timing of any implementation.

D. RESA reserves its right to develop additional positions.

14. RESA's Answer is based on its preliminary review of PPL's Petition and the issues currently apparent from the filing. RESA reserves the right to supplement or revise its position after reviewing discovery, tariff revisions, other parties' filings and proposed implementation details. RESA further reserves the right to participate in hearings, settlement discussions, testimony, briefing and exceptions, subject to further authorization by the Commission and RESA's members.

WHEREFORE, RESA respectfully requests that the Commission:

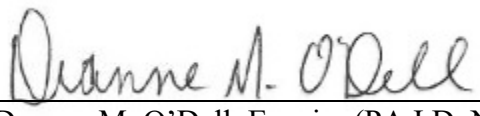
1. grant RESA's Petition to Intervene;

2. recognize RESA as a party to this proceeding;

3. establish a schedule that permits meaningful review of PPL's proposal and related tariff changes; and

4. grant such other relief as the Commission deems just and reasonable.

Respectfully submitted,



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Date: October 23, 2026

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