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October 23, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: 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 Tariff

Petition of PPL Electric Utilities Corporation for Waiver of Any and All Regulations Necessary to Implement the Company's Proposals

Petition of PPL Electric Utilities Corporation for Amendments of Its Default Service Program and Procurement Plan for the Period June 1, 2025, through May 31, 2029

Docket Nos. P-2026-3065185, P-2026-3065186, P-2024-3047290

Dear Secretary Homsher:

On behalf of Constellation Energy Generation, LLC and Constellation NewEnergy, Inc., please find enclosed a Petition to Intervene in the above-referenced proceedings.

Please contact me at (412) 394-9501 or cpottmeyer@jonesday.com if you have any questions in connection with this filing.

Very truly yours,

*/s/ Christopher J. Pottmeyer*
Christopher J. Pottmeyer

Cc: Administrative Law Judge John M. Coogan (jcoogan@pa.gov)
Administrative Law Judge Erin L. Gannon (egannon@pa.gov)
Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing documents upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

Dated this 23rd day of October, 2026.

**VIA ELECTRONIC MAIL**

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*/s/ Christopher J. Pottmeyer*
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*Counsel of Record for Intervenors*
*Constellation Energy Generation, LLC and*
*Constellation NewEnergy, Inc.*

**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 Tariff** | * | **P-2026-3065185** |
| **Petition of PPL Electric Utilities Corporation for Waiver of Any and All Regulations Necessary to Implement the Company's Proposals** | * | **P-2026-3065186** |
| **Petition of PPL Electric Utilities Corporation for Amendments of Its Default Service Program and Procurement Plan for the Period June 1, 2025, through May 31, 2029** | * | **P-2024-3047290** |

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**PETITION TO INTERVENE OF CONSTELLATION ENERGY GENERATION, LLC AND CONSTELLATION NEWENERGY, INC.**

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Before the Pennsylvania Public Utility Commission (the "Commission"), pursuant to 52 Pa. Code §§ 5.71-5.76, Constellation Energy Generation, LLC ("CEG") and Constellation NewEnergy, Inc. ("CNE") (CNE together with CEG, collectively, "Constellation"), by their undersigned counsel, hereby file this Petition to Intervene in the above-captioned proceedings. In support of this Petition to Intervene, Constellation states the following:

1. The principal place of business of Constellation is:

   1310 Point Street, Eighth Floor
   Baltimore, MD 21231

2. The name and address of counsel to Constellation in this matter is:

Christopher J. Pottmeyer
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Constellation respectfully requests that service be made to its counsel of record, Christopher Pottmeyer.

3. On September 14, 2026, PPL Electric Utilities Corporation ("PPL Electric") filed its petition ("Petition") seeking (1) approval of a proposed 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) the elimination of the Transmission Service Charge ("TSC"); (3) changes to the Generation Supply Charges to include the costs currently recovered under the TSC that will not be recovered through the CPTR, along with the associated net over- or under-collection balance; (4) the proposed amendment of PPL Electric's existing Default Service Program and Procurement Plan to incorporate the programmatic and process changes to implement the non-bypassable CPTR, elimination of the TSC, and the changes to its Generation Supply Charges; (5) PPL Electric's changes to its 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 non-bypassable CPTR, eliminate the TSC, and make changes to the Generation Supply Charges; and (6) waivers of any and all Commission regulations needed to implement the proposals.

4. Constellation is headquartered in Baltimore, Maryland, with operations and business activities in 48 states, the District of Columbia, Canada, and the United Kingdom.

5. CEG has been granted market-based rate authority by the Federal Energy Regulatory Commission and is a buyer and seller of wholesale electricity and capacity. CEG provides wholesale power and risk management services to wholesale customers, including through participation in wholesale load procurements, in both regulated and restructured energy markets. CNE is a retail marketing subsidiary of Constellation and is a licensed electric generation supplier ("EGS") in the Commonwealth of Pennsylvania. Both CEG and CNE are active participants in PJM Interconnection, L.L.C. ("PJM").

6. As suppliers of wholesale and retail energy and related products in the PPL Electric service territory, CEG and CNE fall squarely within the test articulated for intervention in this proceeding. That is, CEG and CNE each possess "[a]n interest 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)(1). Among other things, the Petition proposes changes affecting the responsibility of EGSs for NITS and other PJM charges, the recovery of transmission-related costs from shopping and default-service customers, and the potential future recovery of costs associated with PJM reliability mechanisms. Those changes may directly affect CNE's obligations as an EGS, its existing and future retail supply arrangements, its participation in default-service procurements, and the costs associated with serving customers in PPL Electric's territory. CEG likewise has a substantial interest in ensuring that state retail-rate mechanisms do not prejudge, distort, or inconsistently implement wholesale market rules that remain subject to PJM stakeholder processes and FERC review. The public

interest demands that Constellation be afforded the opportunity to be heard in this proceeding. *See* 52 Pa. Code § 5.72(a)(3).

7. Due to the early stage of this proceeding, Constellation is still formulating a position on the Petition and will finalize its positions after an opportunity to further study and evaluate the filing, conduct discovery, and obtain additional information, as necessary.

WHEREFORE, for all the foregoing reasons, Constellation respectfully requests that its Petition to Intervene be granted and that the Commission grant such other relief as is just and reasonable under the circumstances.

Dated: October 23, 2026

Respectfully submitted,

*/s/ Christopher J. Pottmeyer*
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*Counsel to Intervenors*
*Constellation Energy Generation, LLC and*
*Constellation NewEnergy, Inc.*

## VERIFICATION

I, Christopher J. Pottmeyer, counsel for Constellation Energy Generation, LLC and Constellation NewEnergy, Inc., hereby state that the facts contained in the foregoing pleading 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 10 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

*/s/ Christopher J. Pottmeyer*
Christopher J. Pottmeyer