October 30, 2026

Filed Electronically

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
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 No. P-2026-3065185)

Petition of PPL Electric Utilities Corporation for Waiver of Any and All Regulations Necessary to Implement the Company's Proposals (Docket No. P-2026-3065186)

Petition of PPL Electric Utilities Corporation for Amendment of Its Default Service Program and Procurement Plan for the Period June 1, 2025, through May 31, 2029 (Docket No. P-2024-3047290)

Dear Secretary Homsher,

Attached for filing please find the Comments of Base Retail, LLC ("Base") in the above-referenced dockets.

I am available at your convenience to address any questions.

Respectfully submitted,

/s/ Phil Bartlett

Phil Bartlett
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Base Retail, LLC
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation for Approval of Its NonBypassable 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 No. P-2026-3065185
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COMMENTS OF BASE RETAIL, LLC

Base Retail, LLC ("Base") submits these comments in response to the Petitions of PPL Electric Utilities Corporation ("PPL" or the "Company") 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 ("Petitions").

Base is an energy technology company that designs, manufactures, owns, and operates residential batteries. Base also serves as the equivalent of an electric generation supplier ("EGS") in other states. Base currently operates in Texas, Illinois, and Georgia, and by the end of this year will be installing roughly 100 MW of batteries per month. Base delivers lower energy bills and provides affordable backup power to its customers, while putting downward pressure on costs for all customers.

As a competitive retail supplier in Illinois, we are able to reduce capacity and transmission costs

for our customers through managed dispatch of our fleet of batteries. Base accomplishes this by dispatching batteries to reduce the peak load contribution ("PLC") and network service peak load contribution ("NSPLC") tagged to our customers,[1] which in turn reduces the amount of capacity and transmission service we must procure for our customers at the wholesale level.

While PPL's proposal to create a non-bypassable charge for network integration transmission services ("NITS") is well-intentioned, as it seeks to "ensure that Rate LP-6 large load interconnections, like data 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,"[2] a non-bypassable charge applicable to all customer classes is not required to achieve that goal. Transmission costs related to large loads can be isolated and assigned to them without imposing a non-bypassable charge on all customers. Indeed, in its recent show cause order, FERC required PJM to ensure that transmission costs to serve large loads are transparent so they can be appropriately allocated to them.[3]

Base is concerned about the unintended consequence of limiting opportunities for residential customers to reduce their overall electric bills. Specifically, making transmission charges non-bypassable, reduces the incentive for customers to reduce demand during network service peak load times. While this may reduce the risk for EGSs,[4] in doing so it also eliminates the opportunity for those costs to be mitigated by reducing load during peak times and for customers to benefit from these mitigation strategies through lower rates. Rather than enhancing competition,[5] PPL's approach of making transmission charges non-bypassable will limit the range of competitive products available to consumers.

If this proposal moves forward, we suggest adoption of a narrow opt-out to preserve the ability of

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[1] In PJM, PLCs are measured based on a customer's withdrawals during the 5 highest coincident peak hours, while NSPLC is based on withdrawals during the single highest peak hour. *See* PJM, *Manual 19: Load Forecasting and Analysis*, Section 4 (Peak Load Allocation/5CP); PJM, *Manual 27: Open Access Transmission Tariff Accounting*, § 5.2.1 (Network Service Peak Load).

[2] Petitions at 2.

[3] FERC Order Instituting Proceeding Under Section 206 of the Federal Power Act, Docket. EL26-67-000 (June 18, 2026), at ¶ 67.

[4] *Cf*. Petitions at 6; PP&L Industrial Customer Alliance ("PPLICA") Answer to Petition of PPL Electric Utilities Corporation for Approval of Its Non-Bypassable Customer Protection Transmission Rider, at ¶ 13.

[5] PPL asserts that "CPTR can enhance competition in the retail electric market and improve electric rate affordability." Answer of PPL Electric Utilities Corporation to the New Matter of the Office of Consumer Advocate at ¶ 173. To the contrary, CPTR will reduce the components over which EGSs can compete to lower costs for their customers.

customers to benefit from energy supply products that can manage and lower their costs by reducing their contribution to peak load. Specifically, we propose an exception to PPL's Customer Protection Transmission Rider ("CPTR") Tariff for customers of an EGS that has chosen to recover the CPTR's costs directly from its customers (an "Opt-Out EGS"). For customers of an Opt-Out EGS, the CPTR would be computed as if those customers, and the costs PJM allocates to them, were not customers of the Company. We suggest a requirement that an Opt-Out EGS provide written notice to PPL at least 60 days before the CPTR takes effect or the start of a subsequent computation year. The proposed tariff changes are included in Attachment A.

Adoption of this narrow opt-out will not interfere with the goals PPL has outlined in its filing, as a non-bypassable charge for all customers is not required in order to allocate to large loads their incremental transmission costs, and preserves a pathway for customers of an Opt-Out EGS to receive savings while providing benefits to the grid.

Base appreciates the opportunity to provide these comments.

Respectfully submitted,

/s/ Phil Bartlett

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Dated: October 30, 2026

Attachment A

Proposed Revisions to PPL Electric's Customer Protection Transmission Rider Tariff

Submitted by Base Retail, LLC

PPL's CPTR proposal makes two changes: (1) PPL, not the electric generation supplier (EGS), becomes responsible for the Network Integration Transmission Service (NITS) and other transmission costs PJM allocates to load serving entities, and (2) PPL recovers those costs from every customer through the CPTR. Base proposes that EGSs be allowed to opt out and keep responsibility for their own customers' costs (as is the case today). The CPTR would still apply as PPL proposes to other customers.

#	Location	Current Language (PPL's proposal)	Suggested Replacement Language
1	Retail Tariff, CPTR Rider, 1st paragraph (p. 23)	The Customer Protection Transmission Rider (CPTR) shall be applied to bills of all customers of the Company.	The Customer Protection Transmission Rider (CPTR) shall be applied to bills of all customers of the Company, except for customers of an EGS that has chosen, by written notice to the Company at least 60 days before the CPTR takes effect or the start of a subsequent computation year, to recover the CPTR's costs directly from its customers (an "Opt-Out EGS"). The CPTR shall be computed as if customers of an Opt-Out EGS, and the costs PJM allocates to them, were not customers of the Company.
2	Retail Tariff, CPTR Rider, 3rd paragraph (p. 23)	The CPTR, computed using the formulae described below, shall be applied to the monthly bill of each customer receiving service from the Company and shall be reconciled on an annual basis for undercollections and overcollections experienced during the previous year.	Except for customers of an Opt-Out EGS, the CPTR, computed using the formulae described below, shall be applied to the monthly bill of each customer receiving service from the Company and shall be reconciled on an annual basis for undercollections and overcollections experienced during the previous year.
3	Retail Tariff, Net Metering Provisions for Shopping Customers, ¶ 2 (p. 21C)	If a net-metering customer takes service from an EGS, the Company will credit the customer for the CPTR and distribution charge for each kilowatt hour produced by a Tier I or Tier II resource installed on the customer-generator's side of the meter…	If a net-metering customer takes service from an EGS, the Company will credit the customer for the distribution charge and, except for customers of an Opt-Out EGS, the CPTR for each kilowatt hour produced by a Tier I or Tier II resource installed on the customer-generator's side of the meter…
4	Supplier Tariff, § 3.1(b) (p. 7)	PPL deletes: "a service agreement for Network Integration Transmission Service under the PJM Tariff, fully executed by a duly authorized representative of the EGS;"	in the case of an Opt-Out EGS, a service agreement for Network Integration Transmission Service under the PJM Tariff, fully executed by a duly authorized representative of the EGS;

#	Location	Current Language (PPL's proposal)	Suggested Replacement Language
5	Supplier Tariff, § 4.6, last sentence (p. 8)	For purposes of this Tariff, transmission services do not include Network Integration Transmission Service and the other transmission services for which the costs are allocated to the Company and recovered through the Company's Customer Protection Transmission Rider.	For purposes of this Tariff, <u>except in the case of an Opt-Out EGS,</u> transmission services do not include Network Integration Transmission Service and the other transmission services for which the costs are allocated to the Company and recovered through the Company's Customer Protection Transmission Rider.
6	Supplier Tariff, § 9.1 (p. 13)	To the extent it is responsible for the following activities, the Scheduling Coordinator's installed capacity obligation, import capability, load scheduling and reconciliation rights and responsibilities shall include its own Customers and the Customers of its Coordinated Suppliers.	To the extent it is responsible for the following activities, the Scheduling Coordinator's <u>transmission service obligation (for an Opt-Out EGS)</u>, installed capacity obligation, import capability, load scheduling and reconciliation rights and responsibilities shall include its own Customers and the Customers of its Coordinated Suppliers.