COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

October 30, 2026

Via Electronic Filing
Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
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

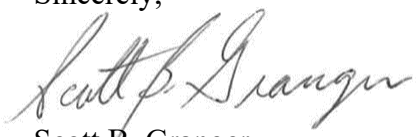
Pennsylvania Consumer Advocate v.
PPL Electric Utilities Corporation
Docket No. C-2026-3065756
I&E Prehearing Memorandum

Dear Secretary Homsher:

Enclosed for electronic filing please find the Prehearing Memorandum of the Bureau of Investigation and Enforcement (I&E) in the above-captioned proceeding.

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Scott B. Granger
Senior Prosecutor
Bureau of Investigation and Enforcement
(717) 425-7593
sgranger@pa.gov

Enclosures

cc: Administrative Law Judge John M. Coogan (*via email – jcoogan@pa.gov*)
Administrative Law Judge Erin L. Gannon (*via email – egannon@pa.gov*)
Per Certificate of Service

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 No. P-2026-3065185
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PREHEARING MEMORANDUM
OF THE
BUREAU OF INVESTIGATION AND ENFORCEMENT

TO: ADMINISTRATIVE LAW JUDGES JOHN M. COOGAN AND ERIN L. GANNON:

The Bureau of Investigation and Enforcement ("I&E") of the Pennsylvania Public Utility Commission ("Commission") respectfully submits the following Prehearing Memorandum in the above-captioned proceedings.

The Bureau of Investigation and Enforcement Prosecutor in this proceeding will be Scott B. Granger. Contact information is as follows:

By mail:	Scott B. Granger Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120
By e-mail:	sgranger@pa.gov
By telephone:	(717) 425-7593

I. INTRODUCTION

On September 14, 2026, PPL Electric Utilities Corporation's ("PPL" or "PPL Electric" or the "Company") filed its Petition ("PPL Petitions") requesting the Pennsylvania Public Utility Commission ("Commission") approve: (1) the Company's non-bypassable Customer Protection Transmission Rider ("CPTR") to recover the Network Integration Transmission Service ("NITS") costs and certain other transmission costs and to allocate those costs the Company would not have incurred but for the interconnection of large load customers to Rate LP-6; (2) the elimination of the Transmission Service Charge ("TSC"); (3) the Company's 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 their associated net over or under-collection balance; (4) the proposed amendment of PPL Electric's existing Default Service Program and Procurement Plan ("DSP VI") to incorporate the programmatic and process changes that are necessary to implement the non-bypassable CPTR, eliminate the TSC, and make the changes to its Generation Supply Charges; (5) the Company'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") that are needed to implement the non-bypassable

CPTR, eliminate the TSC, and changes to the Generation Supply Charges, as set forth in the *pro forma* supplements to the Retail and Supplier Tariffs; and (6) waivers of any and all Commission's regulations that are needed to implement PPL Electric's requests.[1]

PPL Electric stated that it filed this Petition 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] PPL Electric stated further that its proposals will provide increased transparency into the Company's recovery of transmission facilities costs for all customers and will address concerns regarding the affordability of electric rates for all other rate classes.[3]

On October 2, 2026, in a related filing at a separate docket number, the Office of Consumer Advocate ("OCA") filed a Formal Complaint ("OCA Complaint") and Public Statement against PPL Electric,[4] as a public utility and electric distribution company ("EDC"), generally alleging that PPL Electric's exiting 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 because it causes existing consumers to inappropriately bear the risks and consequences of: (1) paying for new and higher costs that are caused by the additions of data centers to PPL Electric's service territory and the regional grid operated by PJM Interconnection, L.L.C. ("PJM"); and (2) receiving service that is frequently interrupted or curtailed due to strains placed on electricity 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

1 *See* PPL Petition, pp. 1-2 and cover letter.
2 PPL Petition, p. 2.
3 *Id.*, pp. 2-3.
4 *See* Docket No. C-2026-3065756.

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]

In its Complaint, the OCA recognized the existence of Rate LP-6 in PPL Electric's tariff, which the Commission approved based on a settlement in PPL Electric's 2025 rate case. The OCA noted, however, that settlement contained a specific provision allowing the parties to re-open Rate LP-6 after the Commission's issuance of a final model tariff.[6] The OCA added, given that the Commission has issued a final model tariff, further given that the Commission left it up to the EDC's discretion to voluntarily adopt the model tariff, and further given the rapidly evolving data center load forecasts for PPL Electric's service territory, upon preliminary review, the OCA believes and avers that Rate LP-6 contains inadequate protection for existing customers from the known and foreseeable costs and reliability impacts due to unprecedented, rapid additions of data centers to the PPL Electric system and the PJM grid.[7]

On September 21, 2026, the Office of Small Business Advocate ("OSBA") filed a Notice of Appearance in these proceedings.

On September 22, 2026, I&E filed its Notice of Appearance in these proceedings.

On October 2, 2026, the Office of Consumer Advocate ("OCA") filed an Answer to the PPL Petitions and Public Statement in these proceedings.

On October 5, 2026, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") filed a Petition to Intervene and an Answer to the PPL Petitions in these proceedings.

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5 OCA Complaint, pp. 1-2.
6 *Id.*, p. 2.
7 *Id.*

On October 14, 2026, Administrative Law Judges John M. Coogan and Erin L. Gannon (the "ALJs") issued a Prehearing Conference Notice and Prehearing Conference Order scheduling a Telephonic Prehearing Conference for Tuesday, November 3, 2026, beginning at 10:00 am.

Further, in their Initial Prehearing Conference Notice at Docket No. C-2026-3065756 regarding the OCA's Complaint, the ALJs requested that the parties address the issue of consolidating the OCA's Complaint docket with this proceeding as it appears there will be significant overlapping of issues and parties.

On October 21, 2026, the PP&L Industrial Customer Alliance ("PPLICA") filed an Answer to the PPL Petition in this proceeding.

I&E anticipates that various other parties will file petitions to intervene between the date of this I&E prehearing memo and the prehearing conference.

II. CONSOLIDATION

I&E supports the consolidation of the OCA Complaint's Docket No. C-2026-3065756 into this proceeding.

III. ISSUES

The following list represents I&E's preliminary determination of the potential issues in these proceedings. The listing is as complete as can be made at this time. I&E reserves the right to address other issues, as it deems appropriate if any such relevant issues arise.

- Just and Reasonable Rates, 66 Pa. C.S. Section 1301.
- Non-discriminatory Rates, 66 Pa. C.S. Section 1304.
- Reliability of Utility Service, 66 Pa. C.S. Section 1501.
- Non-discriminatory Service, 66 Pa. C.S. Section 1502.
- Standards of Service and Facilities, 66 Pa. C.S. Section 1504.
- Proper Service and Facilities Established on Complaint, 66 Pa. C.S. Section 1505.
- Rate Service and Customer Classifications.

- Large Load Entities and Interruptible Service
- Base Load Grid Generation Capacity.
- PJM's Reliability Backstop Capacity Requirement.
- Transmission Facilities Expansion and Costs.
- Avoided Costs/Stranded Costs.
- Cost Causation and Cost of Service.
- Electric Utility Industry Standards under 66 Pa. C.S. Sections 2801 et seq.
- Tariff Rates Default Service, 66 Pa. C.S. Section 2807.
- Utility Service Supply Shopping.
- Socialization of Cost of Service between and within Customer Classes.
- Distribution Cost of Service.
- Transmission and Generation Issues Outside Commission Jurisdiction.

IV. WITNESSES

I&E currently expects that it may call the following expert witnesses without being limited thereto:

- Ethan Cline, Fixed Utility Valuation Engineer.

The I&E witnesses may be contacted through the information listed above for Prosecutor Granger. The witness list is provided without the benefit of complete discovery or analysis of the positions of potential other parties to this proceeding. Accordingly, I&E reserves the right to call additional witnesses or withdraw the name of the witnesses listed above.

V. EVIDENCE

I&E expects to present all written direct, rebuttal and surrebuttal testimony and accompanying exhibits at the evidentiary hearing. Moreover, I&E intends to rely on the Company's filing, supplemental testimony, answers to data requests and interrogatories, annual reports and other documents submitted to the Commission, other relevant Commission filings, any other relevant Commonwealth agency letters or reports, general financial market information sources and other public documents and reports.

VI. DISCOVERY

Discovery in these proceedings will be conducted according to 52 Pa. Code §§5.321 et. seq. No modifications to the rules of discovery have been proposed by I&E. I&E will give due consideration to any discovery modifications proposed by any other party. In the past, I&E has not opposed the discovery modifications as routinely proposed by the OCA. Also, pursuant to 52 Pa. Code §§5.322 and 5.331(b), discovery has begun and is ongoing.

VII. SCHEDULE

I&E is working with the parties to develop a schedule in this proceeding. As of this date, the parties have tentatively agreed to the schedule proposed below.

Filing PPL Petitions	September 14, 2026
Direct - All Parties all issues	January 14, 2027
Rebuttal Testimony	February 12, 2026
Surrebuttal Testimony	March 5, 2027
Written Rejoinder	March 11, 2027
Evidentiary Hearings	March 16-18, 2027
Main Brief	April 8, 2027
Reply Brief	April 23, 2027[8]

VIII. PUBLIC INPUT HEARINGS

I&E does not oppose public input hearings. Should public input hearings be deemed necessary, I&E recommends the Commission consider the use of both in-person and telephonic hearings to encourage increased participation by the ratepayers.

[8] Date chosen based on targeting the July 29, 2027, Public Meeting.

IX. SERVICE OF DOCUMENTS

I&E requests that all documents in this proceeding be served on:

Scott B. Granger, Esq.
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
sgranger@pa.gov

For purposes of satisfying in-hand requirements for discovery responses, prepared testimony, briefs, and other documents during this proceeding, and consistent with Commission regulations and policy, I&E proposes to only serve and accept electronic delivery of documents.

X. SETTLEMENT

I&E will maintain an open dialogue and is willing to make good faith efforts to successfully resolve this matter through settlement. In the event settlement discussions fail to result in a full and complete resolution of the matter, I&E is prepared to fully or partially litigate this proceeding.

Respectfully Submitted,



Scott B. Granger
Senior Prosecutor
PA Attorney ID No. 63641

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

Dated: October 30, 2026

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Prehearing Memorandum** dated October 30, 2026, in the manner and upon the persons listed below:

Served via Electronic Mail Only

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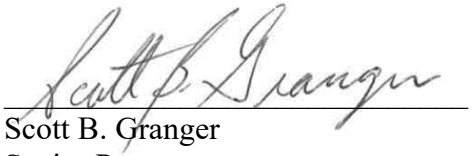
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