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October 30, 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 Petition 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 Prehearing Conference Memorandum in the above-referenced proceeding.

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 30th day of October, 2026.

VIA ELECTRONIC MAIL

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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**

PREHEARING CONFERENCE MEMORANDUM OF CONSTELLATION ENERGY GENERATION, LLC AND CONSTELLATION NEWENERGY, INC.

Before the Pennsylvania Public Utility Commission (the "Commission"), pursuant to 52 Pa. Code § 5.222 and the Prehearing Conference Order issued on October 20, 2026, Constellation Energy Generation, LLC ("CEG") and Constellation NewEnergy, Inc. ("CNE") (CNE together with CEG, collectively, "Constellation"), by their undersigned counsel, hereby file this Prehearing Conference Memorandum in the above-captioned consolidated proceeding.

I. HISTORY OF THE PROCEEDING.

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.

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").

On September 28, 2026, Secretary Homsher published a notice in the Pennsylvania Bulletin and on the docket of this consolidated proceeding, stating in relevant part that petitions to intervene were due by October 23, 2026. On that date, Constellation filed a petition to intervene to ensure

that its interests as a wholesale and retail supplier of electricity are adequately represented in this proceeding.

II. ANTICIPATED ISSUES.

Constellation is still formulating its positions on the issues presented by the Petition. Based on a preliminary review, Constellation expects that potential issues in this proceeding will include, but are not limited to:

(i) the appropriate allocation of costs to the specific large load customers who caused those costs to be incurred consistent with cost causation principles;

(ii) secondary allocation of costs if a large load customer to whom costs were originally allocated becomes insolvent, relocates, ceases operations, or otherwise becomes unable to satisfy a continuing obligation that it caused;

(iii) specificity regarding PPL Electric's proposed "but for" cost methodology;

(iv) specificity regarding the PJM billing line items that will be recovered through the CPTR, those that remain the responsibility of load-serving entities or EGSs, and those that will be recovered through default-service generation charges;

(v) justification for PPL Electric's proposed treatment of existing transmission service over- or under-collections;

(vi) an appropriate transition mechanism for existing competitive retail supply contracts; and

(vii) the manner in which PPL Electric's proposed tariff language addresses issues still pending before the Federal Energy Regulatory Commission, including PJM's Reliability Backstop Procurement proposal, its Interim Reliability Assurance Solution proposal, and any other comparable PJM reliability constructs.

Constellation reserves the right to address other issues as it deems appropriate.

Constellation is willing to participate in settlement discussions should they occur in this proceeding. If settlement is unsuccessful, Constellation takes no position at this time on whether a hearing is necessary or whether the matter should instead be decided on legal briefs.

III. WITNESSES.

Constellation continues to assess its strategy for this proceeding and does not presently intend to sponsor a witness for direct testimony. Constellation reserves the right to sponsor a witness for direct, rebuttal, or other testimony if developments in the case warrant testimony and upon appropriate notice to the Administrative Law Judges and the parties. Constellation also reserves the right to participate in this proceeding and adduce evidence through discovery.

IV. DISCOVERY MODIFICATIONS AND LITIGATION SCHEDULE.

At this time, Constellation has no proposed modifications to the normal scope of discovery and does not propose a litigation schedule. At the time of this filing, Constellation is amenable to forthcoming schedules that may be proposed by other parties, but reserves the right to raise potential discovery modifications or objections to a litigation schedule at a later time.

V. SERVICE OF DOCUMENTS.

Constellation is represented in this proceeding by the following attorneys:

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Constellation respectfully requests that service be made to its counsel via email and agrees to receive service of documents electronically in this proceeding. To the extent that materials are not available electronically, Constellation requests that only one hard copy of documents, if any, be served upon Ryan A. Doringo at the above mailing address.

Dated: October 30, 2026

Respectfully submitted,

/s/ Christopher J. Pottmeyer
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