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October 30, 2026

Via Electronic Filing

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
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 Nos. P-2026-3065185, P-2026-3065186, P-2024-3047290

Pennsylvania Consumer Advocate v. PPL Electric Utilities Corporation
Docket No. C-2026-3065756

Dear Secretary Homsher:

Enclosed for electronic filing please find the Retail Energy Supply Association's ("RESA") Prehearing Memorandum with regard to the above-referenced matters. Copies to be served in accordance with the attached Certificate of Service.

Sincerely

Deanne M. O'Dell

Deanne M. O'Dell

DMO/dmc

Enclosure

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's Prehearing Memorandum, 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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Date: October 30, 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
and	:	
Pennsylvania Consumer Advocate v. PPL Electric Utilities Corporation	:	Docket No. C-2026-3065756

PREHEARING MEMORANDUM
OF RETAIL ENERGY SUPPLY ASSOCIATION

Pursuant to 52 Pa. Code §§ 5.72-5.75, the Prehearing Conference Orders dated October 14, 2026 and October 20, 2026 and subject to the granting of its Petitions to Intervene filed on October 23, 2026 and October 29, 2026, the Retail Energy Supply Association ("RESA")[1] submits this Prehearing Memorandum. RESA does not oppose consolidation of these proceedings.

I. BACKGROUND

On September 14, 2026, PPL Electric Utilities Corporation ("PPL") filed a Petition at Docket No. P-2026-3065185 requesting approval of a non-bypassable Customer Protection Transmission Rider ("CPTR"), elimination of its existing Transmission Service Charge ("TSC"),

[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 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.

changes to its Generation Supply Charges, and amendments to its Retail Tariff and Electric Generation Supplier Coordination Tariff.

PPL's proposal would alter the manner in which certain transmission and transmission-related costs are allocated, recovered, billed, and managed for shopping customers and default-service customers. Among other things, PPL proposes to recover NITS and certain other transmission costs through the CPTR; eliminate the TSC; move certain remaining transmission costs into Generation Supply Charges; allocate certain network-upgrade costs to Rate LP-6 customers; and establish a mechanism addressing future RBP and IRAS charges or credits ultimately assigned to PPL and properly attributable to Rate LP-6 customers.

PPL also filed a related petition at Docket No. P-2026-3065186 seeking waiver of regulations necessary to implement its proposals and a petition at Docket No. P-2024-3047290 seeking amendment of its Default Service Program and Procurement Plan.

On June 29, 2026, the Office of Consumer Advocate ("OCA") filed a complaint against PPL at Docket No. C-2026-3065756. OCA's Amended Complaint, filed October 21, 2026, challenges PPL's existing large-load framework, including Rate LP-6, and raises issues concerning the allocation of transmission, distribution, capacity, RBP, and IRAS costs; large-load service and reliability requirements; curtailment and load-shedding procedures; PPL's agreements with large-load customers; and PPL's load-forecasting practices.

The Amended Complaint seeks, among other things, consideration of a separate rate and service classification for data centers; assignment of incremental transmission and distribution costs and an appropriate share of embedded transmission costs to large-load customers; treatment of capacity, RBP, and IRAS costs attributable to large-load customers; mandatory interruptible service; interconnection and load-shedding requirements; protections against cost shifting and

stranded costs; revisions to PPL's large-load agreements; and review of PPL's load-forecasting practices.

The CPTR proceeding and the complaint proceeding substantially overlap. Both proceedings concern the allocation and recovery of transmission and reliability-related costs associated with large-load customers, including the treatment of RBP and IRAS costs and the potential effects of PPL's proposed framework on shopping customers and competitive suppliers. The complaint proceeding also raises broader issues concerning mandatory interruptibility, load shedding, large-load agreements, and load forecasting.

RESA is a trade association whose members include Electric Generation Suppliers ("EGSs") licensed to serve customers in Pennsylvania, including customers in PPL's service territory. RESA members serve shopping customers under retail supply contracts and are affected by the allocation, recovery, and management of transmission, capacity, and reliability-related costs, including NITS and other PJM-related charges.

RESA has filed a Petition to Intervene and limited Answer in the CPTR proceeding and a Petition to Intervene in the complaint proceeding. RESA seeks party status in both matters to protect its members' interests, provide a collective competitive-market perspective, and assist the Commission in considering the relationship between the proceedings.

II. ISSUES

Based on its current review, RESA anticipates that the following issues may require consideration:

1. The precise PJM charges, credits, obligations, and risks that would be transferred to PPL or recovered through the CPTR, and the obligations that would remain with EGSs.
2. The effect of the CPTR, changes to Generation Supply Charges, elimination of the TSC, and related tariff changes on:
    a. EGS payment obligations;

b. retail supply contracts;

c. supplier products;

d. supplier risk management;

e. customer negotiations;

f. billing and EDI processes;

g. customer disclosures; and

h. market-based services, including demand response and virtual power plant arrangements.

3. Whether and how the CPTR should be reflected in the Price to Compare.

4. The appropriate allocation and recovery of transmission, distribution, capacity, RBP, IRAS, and network-upgrade costs associated with large-load customers, including the treatment of:

   a. incremental and embedded costs;

   b. intra-class allocations;

   c. "but-for" costs;

   d. RBP charges, IRAS charges, and related credits.;

5. Whether the proposed cost-allocation framework could result in cost shifting among large-load customers, other customer classes, default-service customers, shopping customers, or EGSs.

6. The appropriate treatment of large-load customers under PPL's Retail Tariff, Supplier Tariff, and Default Service Program, including whether a separate rate or service classification is warranted.

7. Issues concerning large-load service and reliability requirements, including:
   a. mandatory interruptible service;
   b. curtailment and related operating procedures;
   c. load-shedding procedures; and
   d. interconnection requirements.

8. Transition and implementation issues, including:

   a. existing EGS contracts extending beyond the effective date of any approved changes;
   b. contracts being priced or executed before implementation;
   c. potential duplicative recovery of transmission costs;
   d. customer disclosures and contract modifications;
   e. supplier billing and EDI changes;
   f. reconciliation and true-up mechanisms; and
   g. the timing of implementation.

RESA is continuing to evaluate PPL's proposals, the Amended Complaint, the positions of the other parties, and the information developed through discovery. RESA does not take a final

position at this stage on all claims, proposals, or requested remedies. RESA reserves the right to raise other issues identified through its continued review and analysis, discovery, procedural developments, or the positions advanced by other parties.

III. PROCEDURAL SCHEDULE

RESA will cooperate with the parties and presiding officer to develop a reasonable procedural schedule.

IV. HEARINGS

At this time, RESA continues to evaluate the issues in this proceeding and is unable to estimate the amount of hearing time (if any) that may be needed.

V. WITNESSES

RESA continues to assess its strategy for this proceeding and reserves the right to add or change the identity of its witnesses at any time, upon appropriate notice to the ALJ and the parties.

VI. POSSIBILITY OF SETTLEMENT

RESA is willing to participate in settlement discussions with the parties to narrow the issues in this matter.

VII. SERVICE OF DOCUMENTS

RESA's attorneys in this matter are:

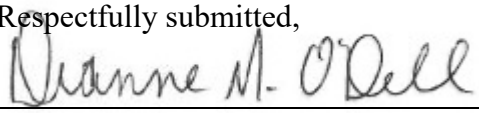
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RESA prefers that documents be served electronically to the above email addresses and agrees to receive service of documents electronically in this proceeding. To the extent that materials are not available electronically, RESA requests that only one hard copy of documents, if any, be served upon Deanne O'Dell at the above mailing address.

Deanne O'Dell will be the primary speaker on behalf of RESA for purposes of the prehearing conference.

Respectfully submitted,



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Dated: October 30, 2026

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