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October 30, 2026

By Electronic Filing

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor (Filing Room)
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
REI Prehearing Memorandum

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is Regenerative Energy Initiative's ("REI") Prehearing Conference Memorandum in the above-captioned proceeding. Copies are being served on parties listed in the attached Certificate of Service.

If you have any questions, please contact me.

Very truly yours,

/s/ Judith D. Cassel

Judith D. Cassel
Micah R. Bucy
Kathryn C. Read-Fisher

Counsel for Regenerative Energy Initiative

JDC/das
Enclosure
cc: Administrative Law Judge John M. Coogan jcoogan@pa.gov
Administrative Law Judge Erin L. Gannon 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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Pennsylvania Consumer Advocate v. PPL Electric Utilities Corporation	:	Docket No. C-2026-3065756

PREHEARING CONFERENCE MEMORANDUM OF REGENERATIVE ENERGY INITIATIVE

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

Pursuant to the Prehearing Conference Order issued on October 14, 2026, Section 333 of the Public Utility Code, 66 Pa. C. S. § 333, and in anticipation of the telephonic Prehearing Conference scheduled for November 3, 2026, Regenerative Energy Initiative ("REI"), by and through its undersigned counsel, HMS Legal LLP, respectfully provides the following information:

I. INTRODUCTION AND PROCEDURAL HISTORY

1. 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 put 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]

2. On October 2, 2026, the Office of Consumer Advocate ("OCA") filed a Formal Complaint and Public Statement against PPL Electric Utilities Corporation regarding the justness and reasonableness of its existing rates and service in relation to the interconnection of large load customers in PPL's service territory.

[1] See PPL Petition, pp. 1-2.

3. On October 7, 2026, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") filed a Petition to Intervene and Answer in support of OCA's complaint.

4. On October 8, 2026 the OCA filed a notice of Appearance for Johnathan M. Longhurst and Olivia M. Spergel and PPL filed a Notice of Entry of Appearance of Michael Shafer, Devin Ryan, Hayley Wilburn, Emily Grecu, David MacGregor and Lindsay Berkstresser on behalf of PPL Electric Utilities Corporation. PPL also filed an Unopposed Motion for Extension of Time to File Responsive Pleadings in this proceeding.

5. On October 15, 2026, Governor Josh Shapiro filed a Petition to Intervene.

6. On October 16, 2026, PPL filed a Notice of Entry of Appearance for Megan E. Rulli.

7. On October 19, 2026, the OCA filed an Amended Complaint.

8. On October 20, 2026 the Initial Prehearing Conference Notice was issued scheduling this matter for a Telephone or Virtual Hearing on November 3, 2026 before Administrative Law Judge John M. Coogan and Administrative Law Judge Erin L. Gannon ("ALJs"). The ALJs also issued the Prehearing Conference Order with instructions for joining the hearing and directing parties to submit Prehearing Conference Memorandum by 4:30 p.m. on October 30, 2026.

9. On October 21, 2026 the ALJs issued an Order Granting Motion of PPL Electric Utilities Corporation for Extension of Time to File Responsive Pleadings until November 2, 2026.

10. On October 28, 2026, Secretary Matthew Homsher filed a letter transmitting the amended complaint to Michael J. Shafer on behalf of PPL Electric Utilities Corporation.

II. SERVICE ON REI

11. REI is represented by the attorneys at HMS Legal LLP. REI requests service as follows:

Judith D. Cassel, PA Attorney ID No. 209393
Micah R. Bucy, PA Attorney ID No. 320196
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For the purposes of satisfying the in-hand requirements for discovery responses, prepared testimony and briefs, REI will accept electronic delivery of documents.

III. REPRESENTATION AT PREHEARING CONFERENCE

12. REI will be represented at the Prehearing Conference by Judith Cassel who will serve as lead counsel in this proceeding.

IV. DISCOVERY

13. REI agrees with the OCA's and PPL's proposed discovery and briefing schedule.

V. SETTLEMENT

14. REI is willing to engage in settlement discussions.

VI. ISSUES PRESENTED

The following are the current issues REI expects to address during the proceedings, but REI reserves the right to expand this list to include issues that might arise during discovery.

15. PPL's proposed changes as outlined in its filings will likely reduce the currently enjoyed energy savings rate for GS and LP4 C&I customers that have existing installed behind-the-meter ("BTM") generation.

16. The Company's proposed changes, which will remove transmission costs from the free market is antithetical to the intent of Customer Choice and will likely have a deleterious effect on competitive market signals essential to right-sized pricing.

17. The Company's proposed changes will likely disadvantage energy users who have seasonal loads.

18. PPL's proposed CPTR would likely reduce the energy savings a customer could realize by installing a BTM BESS system.

19. PPL's CPTR proposed changes would likely reduce the attractiveness of installing new BTM generation which in turn would lead to higher energy costs for all PPL rate payers.

20. PPL's CPTR will likely suppress or disincentive additional DER systems.

21. Customers that retain transmission risk may manage their exposure by reducing load during the PJM peak periods used to establish their transmission Peak Load Contribution. The proposed CPTR would change how these costs are recovered for affected customer classes by moving transmission costs from competitive supply arrangements to a non-bypassable utility charge for most rate classes.

VII. WITNESSES AND SUBJECT OF TESTIMONY

22. REI intends to call John Costlow as a fact and expert witness. Additionally, REI intends to call the following expert witnesses: Peter Richards, Danielle Wilks, and Steve Russial. REI respectfully reserves the right to supplement this Prehearing Conference Memorandum to identify additional witnesses based on documents received in discovery.

VIII. EVIDENCE

23. REI will present expert witness testimony and their corresponding exhibits along with any relevant and related documents and evidentiary materials obtained via discovery and as publicly available.

IX. PUBLIC INPUT HEARINGS

24. Given the scope of the changes and the customer impact it may cause, REI respectfully requests that public input hearings be in-person.

X. PROCEDURAL SCHEDULE

25. REI has no issue with the procedural schedule as proposed by Office of Consumer Advocate and the Company.

XI. CONSOLIDATION OF PROCEEDINGS

26. REI supports consolidation of the OCA's Complaint at Docket No. C-2026-3065756 with the PPL Dockets listed in the caption hereto.

Respectfully submitted,

/s/ Judith D. Cassel

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Counsel for Regenerative Energy Initiative

DATED: October 30, 2026

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this filing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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DATE: October 30, 2026

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