COMMONWEALTH OF PENNSYLVANIA

DARRYL A. LAWRENCE
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
(800) 684-6560

@pa_oca
/pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

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

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 Amendment 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:

Attached for electronic filing please find the Office of Consumer Advocate's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Johnathan M. Longhurst

Johnathan M. Longhurst, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 338157
Email: JLonghurst@paoca.org

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

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Office of Consumer Advocate's Prehearing Conference Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 30th day of October 2026.

SERVICE BY E-MAIL ONLY

Elizabeth R. Marx, Esq.
John W. Sweet, Esq.
Ria M. Pereira, Esq.
Lauren N. Berman, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org
Counsel for CAUSE-PA

Devin T. Ryan, Esq.
Hayley E. Wilburn, Esq.
Emily Grecu, Esq.
Post & Schell, P.C.
One Oxford Centre
301 Grant Street, Suite 3010
Pittsburgh, PA 15219
dryan@postschell.com
hwilburn@postschell.com
egrecu@postschell.com
Counsel for PPL Electric

John F. Lushis, Jr., Esq.
David C. Berger, Esq.
Norris McLaughlin P.A.
515 West Hamilton Street, Suite 502
Allentown, PA 18101
jlushis@norris-law.com
dberger@norris-law.com
Counsel for Calpine Retail Holdings LLC

Deanne M. O'Dell, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th floor
Harrisburg, PA 17101
dodell@eckertseamans.com
Counsel for RESA

Lauren M. Burge, Esq.
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com
Counsel for RESA

Judith D. Cassel, Esq.
Micah R. Bucy, Esq.
Kathryn C. Read-Fisher, Esq.
HMS Legal LLP
501 Corporate Circle
Harrisburg, PA 17110
jdcassel@hmslegal.com
mrbucy@hmslegal.com
kcr@hmslegal.com
Counsel for Regenerative Energy Initiative

Emma H. Bast, Esq.
Jessica R. O'Neill, Esq.
Citizens for Pennsylvania's Future
610 North Third Street
Harrisburg, PA 7101
bast@pennfuture.org
oneill@pennfuture.org
Counsel for EDF, NRDC and PennFuture

Michael J. Shafer, Esq.
PPL Services Corporation
645 Hamilton Street, Suite 700
Allentown, PA 18101
mjshafer@pplweb.com
Counsel for PPL Electric

David B. MacGregor, Esq.
Lindsay A. Berkstresser, Esq.
Megan E. Rulli, Esq.
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
dmacgregor@postschell.com
lberkstresser@postschell.com
mrulli@postschell.com
Counsel for PPL Electric

Allison Kaster, Esq.
PA Public Utility Commission
Bureau of Investigation & Enforcement
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265
akaster@pa.gov
Counsel for I&E

Rebecca Lyttle, Esq.
Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
relyttle@pa.gov
Counsel for OSBA

Adeolu A. Bakare, Esq.
Rebecca Kimmel, Esq.
Victoria A. Geddis, Esq.
McNees, Wallace & Nurick
100 Pine Street
Harrisburg, PA 17108-1166
abakare@mcneeslaw.com
rkimmel@mcneeslaw.com
vgeddis@mcneeslaw.com
Counsel for PPLICA

Michael Zimmerman, Esq.
Environmental Defense Fund
257 Park Ave. S.
New York, NY 10010
mzimmerman@edf.org
Counsel for EDF

Pamela C. Polacek, Esq.
Chief Legal and Regulatory Officer
C&T Enterprises, Inc.
Venetia, PA 15367
ppolacek@ctenterprises.org
Counsel for Citizens' Electric

Christopher J. Pottmeyer, Esq.
Jones Day
500 Grant Street, Suite 4500
Pittsburgh, Pennsylvania 15219-2514
cpottmeyer@jonesday.com
Counsel for Constellation

Christopher O'Hara, Esq.
PJM Interconnection
2750 Monroe Boulevard
Audubon, PA 19403-2497
Christopher.ohara@pjm.com
Counsel for PJM

Mark Szybist, Esq.
Jordyn Pace, Esq.
301 North Third Street
Harrisburg, PA 17101
mszybist@pa.gov
jorpace@pa.gov
Counsel for Governor Josh Shapiro

/s/ Johnathan M. Longhurst
Johnathan M. Longhurst, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 338157
Email: JLonghurst@paoca.org

Melanie Joy El Atieh, Esq.
Deputy Consumer Advocate
PA Attorney I.D. # 209323
Email: MElAtieh@paoca.org

Jacob D. Guthrie, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 334367
Email: JGuthrie@paoca.org

Katherine "Katie" Kennedy, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 317237
Email: KKennedy@paoca.org

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: 717-783-5048
Fax: 717-783-7152

Dated: October 30, 2026

Olivia M. Spergel, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 337929
Email: OSpergel@paoca.org

Email: OCAPPL1309@paoca.org

Counsel for:
Darryl A. Lawrence
Consumer Advocate

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

PREHEARING CONFERENCE MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

With regard to the above-captioned petition (Petition) of PPL Electric Utilities Corporation (PPL Electric or Company) and the above-captioned formal complaint of the Pennsylvania Consumer Advocate (Formal Complaint), pursuant to the Prehearing Conference Order issued on October 14, 2026, in the above-captioned proceeding, by the Administrative Law Judges (ALJs) John M. Coogan and Erin L. Gannon, of the Office of Administrative Law Judge (OALJ) of the

Pennsylvania Public Utility Commission (Commission), and pursuant to Section 333 of the Public Utility Code[1] (Code), the Commission's regulations at 52 Pa. Code Sections 5.221-5.224,[2] the Pennsylvania Office of Consumer Advocate (OCA) submits the following Prehearing Conference Memorandum.

I. INTRODUCTION

The OCA is statutorily authorized and obligated to represent the interests of utility consumers in matters properly before the Commission.[3]

PPL Electric is a Commission regulated public utility, electric distribution company (EDC), and default service provider (DSP) that provides electric service to approximately 1.49 million residential, commercial, and industrial customers in 29 counties across eastern and central Pennsylvania.

For the purposes of the Prehearing Conference, Melanie El Atieh and Johnathan Longhurst will be the primary attorneys speaking on behalf of the OCA.

For the reasons discussed herein, the OCA supports consolidation of the Petition and Formal Complaint proceedings and the setting of a reasonable litigation schedule that uses a Public Meeting date that occurs later than the end of the statutory suspension period under Section 1309(b) of the Code, as applicable to the Formal Complaint proceeding. As will be discussed below, the establishment of a procedural schedule that uses a public meeting date of July 29, 2027, after the end of the statutory suspension period, is supported by the parties and is necessary to protect the interest and rights of all parties as well as provide consumers with a meaningful opportunity to be heard at the yet to be scheduled Public Input Hearings. Further, consolidation of

[1] 66 Pa. C.S. § 333
[2] 52 Pa. Code §§5.221-5.224.
[3] 71 P.S. §§ 309-1 – 309-8.

the OCA's Formal Complaint with PPL Electric's Petition proceedings presents substantial scheduling challenges which necessitates adoption of the procedural schedule proposed herein to ensure due process and equity are preserved. As such, the OCA requests the ALJs adopt the procedural schedule proposed herein, which the OCA believes is supported by all parties at the time of submitting this prehearing conference memorandum. However, the OCA will continue to discuss with parties and will provide an oral update at the time of the prehearing conference.

II. PROCEDURAL HISTORY

On September 14, 2026, PPL Electric filed the above-captioned Petition seeking: (1) the Company's 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 undercollection 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 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) seeking waivers of any and all Commission regulations needed to implement the proposals.[4]

[4] PPL Petition at 1.

On September 21, 2026, the Office of Small Business Advocate ("OSBA") filed a Notice of Appearance to PPL Electric's Petition. On October 2, 2026, the OCA filed an Answer with New Matter and Public Statement to PPL Electric's Petition. Also, on October 2, 2026, the OSBA filed a Notice of Intervention and Public Statement to PPL Electric's Petition.

On October 2, 2026 the OCA filed a formal complaint (Complaint), and on October 21, 2026, the OCA filed an amended formal complaint (Amended Complaint), against PPL Electric pursuant to applicable statutes and regulations at 71 P.S. Section 309-4, 66 Pa. C.S. Sections 102, 501-502, 701, 1301-1304, 1309, 1501-1502, 1505, 2803, 2804, 2805(a), and 2807(a), (e); and 52 Pa. Code Sections 5.1(a)(2), 5.21-5.24, 57.19, 57.52, 57.194(d), 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 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.

On October 7, 2026, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) filed a Petition to Intervene and Answer to PPL Electric's Petition

as well as an Anwer and Petition to Intervene in the OCA's Complaint. On October 8, 2026, the Regenerative Energy Initiative (REI) filed a Petition to Intervene in PPL Electric's Petition

On October 14, 2026, a Prehearing Conference Notice and a Prehearing Order were issued by ALJs Coogan and Gannon scheduling a prehearing conference for PPL Electric's Petition for November 3, 2026.

On October 15, 2026, Governor Josh Shapiro filed a Petition to Intervene in the OCA's Formal Complaint proceeding.

On October 19, 2026, the OCA provided notice that it intended to file an Amended Complaint.

On October 20, 2026, ALJs Coogan and Gannon issued a second prehearing order establishing a prehearing conference to be held on November 3, 2026, for PPL Electric's Petition and the OCA's Amended Complaint. The Prehearing Order required Prehearing Memoranda to be filed by October 30, 2026, and required parties to address their position on consolidation.

As noted, on October 21, 2026, the OCA filed an Amended Complaint in the Formal Complaint proceeding. The OCA's Amended Complaint argues that PPL Electric's current framework fails to protect existing non-data center ratepayers from escalating reliability risks, network upgrade costs, capacity market price increases, and potential stranded cost risks caused by the rapid interconnection of large data centers. The OCA seeks the establishment of a separate customer rate and service classification for computational load entities that enforces mandatory interruptible service during emergencies, imposes "but-for" cost allocation, and safeguards overall grid reliability and affordability.

On October 21, 2026, the PP&L Industrial Customer Alliance (PPLICA) filed an Answer to PPL Electric's Petition.

On October 22, 2026, the Environmental Defense Fund (EDF), Natural Resources Defense Council (NRDC), and Citizens for Pennsylvania's Future (PennFuture) (collectively, the Environmental Intervenors) filed Petitions to Intervene in PPL Electric's Petition proceeding.

Also on October 22, 2026, PPLICA filed a Petition to Intervene in the OCA's Formal Complaint proceeding.

On October 23, 2026, Governor Josh Shapiro, Constellation Energy Generation, LLC (Constellation), Citizens' Electric Company of Lewisburg, PA (Citizens), and Amazon Data Services, Inc. (Amazon) filed Petitions to Intervene in PPL Electric's Petition proceeding.

Also on October 23, 2026, the Retail Energy Supply Association (RESA) filed a Petition to Intervene and Answer to PPL Electric's Petition. Also on October 23, 2026, Erika Cook and John Zola filed a Petition to Intervene in the OCA's Formal Complaint proceeding.

On October 27, 2026, REI filed a Petition to Intervene, and OSBA filed a Notice of Intervention, Public Statement, and Verification in the OCA's Formal Complaint proceeding.

On October 28, 2026, the Environmental Intervenors filed a Petition to Intervene in the OCA's Formal Complaint proceeding.

On October 29, 2026, RESA filed a Petition to Intervene in the OCA's Formal Complaint proceeding.

On October 29, 2026, PPL Electric filed a Motion to Consolidate, requesting that the ALJs grant PPL Electric and the OCA Formal Complaint proceedings.

III. ISSUES

Based upon a preliminary analysis of the respective filings, the OCA has compiled a list of issues and sub-issues which it anticipates will be included in its investigation. It is anticipated that other issues may arise and may be pursued once the answers to all the OCA's interrogatories have

been received and analyzed. The issues and sub-issues set forth below, and others that may develop during discovery, will be analyzed and presented as appropriate by the OCA with the assistance of its expert witnesses:

A. PPL Electric's Petition and OCA's Amended Complaint (Overlapping Issues)

1. The OCA will examine the reasonableness and accuracy of the Company's proposal to create a mechanism to directly assigned to Rate LP-6 any future whole reliability costs or credits attributable to large load customers.

2. The OCA will investigate what impact the CPTR will have to customer affordability and the competitive market for electric generation supply service.

3. The OCA will examine how the CPTR will impact structural component of customer-generators' year-end cash-outs of banked excess generation.

4. The OCA will investigate how PPL Electric will determine what constitutes "but for" costs of interconnection for new, large load customers for purposes of assigning such costs to those customers through the CPTR.

5. The OCA will examine whether "but-for" costs will be sufficiently defined.

6. The OCA will examine whether PPL Electric's tariff does not establish new customer classification for rates and service applicable only to data centers to appropriately address the cost impact risks and reliability impacts to service risks presented by the ongoing additions of data centers to PPL Electric's system and the PJM region.

7. The OCA will investigate whether PPL Electric's Tariff contains specific provisions to ensure that transmission and distribution incremental investments caused by data center interconnections as well as the data centers' fair share of embedded costs related to the utility's local transmission system will be paid for by the data centers.

8. The OCA will investigate whether the Company's proposal to include Reliability Backstop Procurement (RBP) and/or Interim Resource Adequacy Service (IRAS) credits and charges – as generation-related costs – in the CPTR – as a transmission service cost recovery mechanism is consistent with the Public Utility Code.

9. The OCA will examine whether PPL Electric's Rate LP-6 contains sufficient rules and regulations to prevent cost shifting and the shifting of stranded costs risks from data centers onto other ratepayers

10. The OCA will investigate whether PPL Electric's existing electric service agreements, construction services agreements, and like agreements with computational load entity customers and/or agents of computational load entity customers, are consistent with PPL Electric's tariff rates, rules, and regulations.

11. The OCA will investigate whether any waiver of the Public Utility Code will be just, reasonable, not unduly discriminatory, and/or in the public interest.

12. The OCA will investigate what impact PPL Electric's proposals will have on customers.

13. The OCA will seek to ascertain whether the Company's proposals are supported, reasonable, and appropriate.

14. The OCA will investigate whether the Company's proposals will provide a benefit to ratepayers.

15. The OCA will examine whether customers will receive sufficient notice as to their CPTR obligation regarding Rate LP-6's specific components of the proposed charge.

16. The OCA will work with the parties to ensure that the chosen name of the tariff change will have sufficient transparency and clarity to its true meaning.

B. The OCA's Amended Complaint Only (Non-Overlapping Issues)

1. The OCA will investigate whether the Company's existing tariff rates, rules, and regulations are unjust, unreasonable, and/or unduly discriminatory or preferential.

2. The OCA will investigate whether the Company's existing service is unreliable, unreasonable, inadequate, and/or unduly discriminatory or preferential.

3. The OCA will act to protect ratepayer by ensuring that ratepayers are (1) not paying new and higher costs that are caused by the additions of data centers to PPL Electric's service territory and the PJM regional grid 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

4. The OCA will investigate whether PPL is taking appropriate preventive steps to ensure that either there is sufficient new supply 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.

5. The OCA will investigate whether PPL Electric's tariff omits mandatory interruptible service rates schedules and implementing tariff operating procedures that are necessary to protect existing customers from experiencing emergency forced customer outages due to the ongoing and foreseeable impacts to reliable service caused by data center additions to PPL Electric's system and the PJM region.

6. The OCA will investigate whether PPL Electric's tariff omits operating rules and sufficient interconnection terms and conditions to protect existing customers from experiencing emergency forced customer outages due to the ongoing and foreseeable impacts to reliable service caused by data center additions to PPL Electric's system and the PJM region

7. The OCA will examine whether PPL Electric is taking reasonable steps to ensure the continued provision of service without unreasonable interruption or outages to its existing customers, particularly its most vulnerable customers, despite known and impending resource inadequacy and transmission constraints that could compromise service

8. The OCA will examine whether PPL Electric's Tariff contains specific provisions to ensure that default service and shopping customers are not subsidizing PJM capacity and Reliability Backstop Procurement costs caused by data centers.

9. The OCA will examine whether PPL Electric's tariff contains sufficient provisions to prevent exacerbating existing affordability challenges for residential customers and contains sufficient provisions to adequately protect eligible low-income customers from the costs and affordability impacts associated with rapid data-center load growth, by requiring adequate universal service fund contributions from the data centers.

10. The OCA will investigate PPL Electric's existing practices related to load forecasting that PPL Electric provides to PJM for purposes of PJM's implementation of markets and transmission planning.

11. The OCA will investigate whether that existing customers are protected and will continue to have access to affordable and reliable electricity service.

12. The OCA will propose the creation of a separate customer class for data centers that requires the data centers to pay their full share of their costs for retail electric service and to prevent those costs from being imposed on other ratepayers.

13. The OCA will propose a separate customer class for data centers which will subject the data centers to mandatory interruptible rates and propose the implementation of tariff operating provisions to ensure overall system reliability for existing customers.

14. The OCA will propose changes to PPL Electric's load tariff rules and regulations governing interconnection, reliability, load shed plans and load shed schedules that will result in reliable, adequate, reasonable, and not unreasonably preferential or advantageous service.

15. The OCA will propose changes to PPL Electric's rates, rules, regulations, practices, classifications or contracts in or based in PPL Electric's Retail Tariff, for distribution service and default service, and Supplier Tariff, as appropriate, that are just, reasonable, not unduly discriminatory or preferential, and otherwise consistent with the Public Utility Code by creating a separate mechanism to ensure that the capacity procured to meet forecasted data center load is paid-for exclusively by data center customers, and that the failure of such customers to meet their forecasted load or the use of peak-shaving strategies to minimize capacity cost exposure does not shift capacity costs to the customer classifications which did not cause unneeded capacity to be procured through the PJM capacity market.

16. The OCA will propose to establish adequate affordability protections through ongoing contributions of data center customers to PPL Electric's universal service programs to mitigate the higher electricity rates caused by data center interconnections and to benefit consumers who need bill payment assistance.

17. The OCA will investigate and propose modifications to existing Electric Services Agreements, Construction Services Agreements, and any like agreements by and between PPL Electric and any computational load entity customer to ensure the agreements result in just, reasonable, not unduly discriminatory or preferential, and otherwise lawful rates.

18. The OCA will investigate whether PPL Electric's load forecasting practices are just and reasonable.

19. The OCA will investigate whether the service or facilities of PPL Electric are unreasonable, unsafe, inadequate, insufficient, or unreasonably discriminatory, or otherwise in violation of the Public Utility Code.

20. The OCA will examine any relevant issues that arise from these proceedings

21. The OCA will investigate to ensure that the Company is complying with all prior orders.

The OCA expressly reserves the right to raise and seek discovery on other relevant issues that may not be specifically listed above.

IV. WITNESSES

The OCA intends to present the direct, rebuttal, and surrebuttal testimonies, as may be necessary, of the below witnesses. Each witness will present testimony in written form and will attach various exhibits, documents, and explanatory information, as may be necessary. In order to expedite the resolution of this proceeding, the OCA requests that copies of all interrogatories, testimony, and answers to interrogatories be mailed and/or emailed directly to the OCA's group email formed particularly for this proceeding.

Load Forecasts for Data Centers	Zach Teti Office of Consumer Advocate 5th Floor, Forum Place 555 Walnut Street Harrisburg, PA. 17101 OCAPPL1309@paoca.org

Relevant White House, DOE, PJM, NERC, FERC, Pennsylvania Governor Public Policy Pronouncements and Decisions and the "Public Policy Consensus" Addressing the Known and Foreseeable Impacts of the Unprecedented Data Center Demand	Frank Felder Independent Electricity Consultants, LLC 1855 Saint Francis Street, Apt. 1612 Reston, VA 20190 OCAPPL1309@paoca.org
Tariff Framework for Data Center Customers to Address Escalating Costs and Reliability Risks	Matthew Hoyt 10480 Little Patuxent Parkway Suite 300 Columbia, Maryland 21044 OCAPPL1309@paoca.org
Cost Allocation and Rate Design to Protect Existing Customers from Costs Impacts of Utility Service to Data Centers	Serhan Ogur 10480 Little Patuxent Parkway Suite 300 Columbia, Maryland 21044 OCAPPL1309@paoca.org
Cost Allocation, Affordability Concerns and Protections, and Low-Income Customer Protections Related to Utility Service to Data Centers	Michael Deupree Acadian Consulting Group, LLC 5800 One Perkins Place Drive Suite 5F Baton Rouge, LA 70808 OCAPPL1309@paoca.org
Electric Engineering, Segmentation & Separation of Critical and Non-Critical Load, Batteries	Rao Konidena Rakon Energy, LLC 2309 Auerbach Street Roseville, MN 55113 OCAPPL1309@paoca.org

The OCA specifically reserves the right to call additional witnesses, as necessary, and retains the flexibility to have the witnesses above address other areas of this case as the case proceeds. If the OCA determines that additional witnesses will be necessary for any portion of its case, it will notify all parties of record immediately.

V. CONSOLIDATION

The OCA supports consolidation of the PPL Electric Petition and the OCA's Formal Complaint proceedings because many, if not all, of the issues raised in PPL Electric's Petition are

also raised in the OCA's Amended Complaint (i.e., the "overlapping issues"). The reverse is not true, as the OCA's Amended Complaint raises many issues that are not found in PPL Electric's Petition (i.e., the "non-overlapping issues"). However, the OCA believes that both the overlapping and non-overlapping issues can and should be addressed in a consolidated proceeding to promote judicial economy, due process, and the public interest.

In support of the benefits of consolidation, the OCA explains which issues are "overlapping issues" as between PPL Electric's Petition and the OCA's Amended Complaint both in the section above titled "Issues" and again here in this section. First, PPL Electric avers that it needs to make changes to its retail tariff and Electric Generation Supplier Coordination Tariff to ensure that rate LP-6 large load interconnection, like data centers, pay for incremental upgrades to PPL Electric's transmission grid but are associated with new large load customer development.[5] By comparison, the OCA, in its Amended Complaint argues that "Data centers should pay for network upgrade infrastructure costs, both transmission and distribution, that are incurred by utility providers to meet their needs given that data centers are the but-for causers of and receive commensurate benefit from the new infrastructure."[6] Further, the OCA argues in its Amended Complaint that PPL Electric's tariff produces existing rates and any negotiated rates stemming therefrom that are unjust, unreasonable, and/or unduly discriminatory or preferential because it does not establish with sufficient specificity the requirement for the data center customer to pay the full incremental costs that would not have been incurred but for their load.[7]

Second, PPL Electric's Petition is seeking to move network upgrade costs arising out of the interconnection of new large load customers into a distinct cost recovery component of the

[5] *See* PPL Petition Appendix C.
[6] OCA Amended Complaint at 6.
[7] OCA Amended Complaint at 70.

CPTR.[8] PPL Electric alleges the CPTR will ensure that large load customers in Rate LP-6 pay for incremental NITS costs and certain other transmission costs necessitated by their interconnection, as well as continuing to pay for transmission costs for the overall transmission system.[9] In comparison, the OCA, in its Amended Complaint also recognizes the deficiencies of PPL Electric's Tariff in this regard.[10] The OCA's complaint provides that, after preliminary review PPL Electric's Tariff currently:

> [D]oes not establish with sufficient specificity the requirement for the data center customer to pay the full incremental costs that would not have been incurred but for their load. This includes directly assigned and allocated distribution costs and transmission costs that may otherwise be recovered through Network Integration Transmission Service (NITS) rates or other wholesale charges that flow through to retail customers.[11]

Further, the OCA, in its Amended Complaint recognizes that absent a provision to require data centers to pay their "but-for" costs the incremental costs caused by large load customers, like data centers, will be embedded in PPL Electric's overall revenue requirement and be recovered in the same manner as other embedded costs.[12] OCA witness Hoyt testified that a minimum monthly billing demand does not necessarily establish the quantity of load used to allocate transmission and capacity costs and that Separate requirements may be necessary to prevent cost shifting in those categories.[13]

Third, PPL Electric in its Petition argues that the CPTR would provide a Commission-supervised mechanism through which PPL Electric could potentially directly assign to Rate LP-6 any future wholesale reliability costs or credits attributable to large load customers.[14] PPL Electric

[8] PPL Petition Appendix C.
[9] *Id*.
[10] OCA Amended Complaint at 70.
[11] OCA Amended Complaint at 70.
[12] OCA Complaint; Hoyt Amended Affidavit at 42.
[13] *Id*.
[14] PPL Petition at 5.

identified that PJM has two related resource adequacy mechanisms in proceedings currently pending before FERC: (1) a Reliability Backstop Procurement ("RBP") framework, which is intended to procure new capacity in response to regional resource-adequacy shortfalls associated primarily with unprecedented large-load growth, and (2) an Interim Resource Adequacy Service ("IRAS"), which is intended to permit qualifying new large loads to receive service subject to curtailment and other requirements during periods when PJM has insufficient real-time resources to meet demand reliably.[15] PPL Electric avers that if FERC approves either proposal and PJM subsequently assigns resulting RBP or IRAS charges, credits, or other financial obligations to PPL Electric due to its role as an Electric Distributor as defined by the PJM Reliability Assurance Agreement, the proposed Rate LP-6 CPTR could, subject to applicable federal requirements and Commission review, transparently include the amounts properly attributable to Rate LP-6, rather than the Company recovering costs caused by large load growth from other customer classes.[16] The OCA in its Amended Complaint likewise, identified that in its September 29, 2026 Order, FERC accepted PJM's RBP proposal, subject to refund and further proceedings, and initiated an expedited process to address concerns with PJM's proposed wholesale cost allocation.[17] OCA witness Hoyt testified that PPL Electric's large load tariff should include a mechanism that assigns RBP costs attributable to computational large loads to those customers, rather than permitting such costs to be shifted to other customer classes.[18]

Fourth, in its Petition, PPL Electric is seeking to increase transparency into the Company's recovery of transmission facilities costs for all customers and will address concerns regarding

[15] *Id*.
[16] PPL Petition at 5-6.
[17] OCA Amended Complaint, Hoyt Amended Affidavit at 59-60.
[18] *Id*.

affordability of electric rates for all other rate classes.[19] Likewise, the OCA in its Amended Complaint, argues that the Commission should require PPL Electric to enter into specific, Commission-approved contractual arrangements with CLE customers as a condition of pursuing the construction of interconnection facilities, through the siting and construction of distribution and/or transmission facilities.[20]

Fifth, and finally, PPL Electric's Petition requests authority to create a non-bypassable Rider on its customers' bills which will allegedly recover the NITS and other transmission costs.[21] PPL Electric avers that the proposed CPTR would eliminate the need to allocate transmission costs to EGSs and for EGSs to recover these costs from their customers making PPL Electric solely responsible for the recovery of the specified transmission costs through the CPTR.[22] In the OCA's Amended Complaint, OCA witness Ogur addresses the recovery of NITS and other transmission costs.[23] OCA witness Ogur, in his affidavit, identified that the current rules and procedures associated with assigning NSPLs to customers/LSEs and/or allocating NITS costs should be modified to ensure that NITS costs are never unjustly and unreasonably shifted from new CLEs to legacy customers. OCA witness Ogur testified that one possible solution is to require PPL Electric to assume responsibility for NITS charges for all of its retail customers, and it would collect PJM NITS costs from retail customers via non-bypassable charges.[24]

Based on the foregoing, there is a significant overlap of issues presented in PPL Electric's Petition and issues identified in the OCA's Amended Complaint. The OCA avers that consolidation of the Petition and Formal Complaint proceedings, to address both the overlapping

[19] PPL Petition Appendix C.
[20] OCA Amended Complaint at 90.
[21] PPL Petition Appendix C.
[22] *Id*.
[23] OCA Amended Complaint, Ogur Affidavit at 17-18.
[24] OCA Amended Complaint, Ogur Affidavit at 18.

and non-overlapping issues, will promote judicial economy, due process, and reduce any public confusion as to the subject matter of the proceedings. As such, the OCA requests the ALJs to grant consolidation of the two proceedings.

VI. PROPOSED SCHEDULE

The OCA continues to work with the Company and the parties on a procedural schedule that is a reasonable compromise of the parties' competing interests within the time afforded for litigation of this matter.

The end of the statutory suspension period of the OCA's Amended Complaint will occur on July 20, 2027. The public meeting date which aligns with the Commission's traditional scheduling methodology is June 10, 2027, or possibly July 8, 2027. However, after conferring, all parties support using the July 29, 2027, public meeting to establish a litigation schedule. Using a litigation schedule based on the June 10th or July 8th Public Meetings will produce an undue burden on all parties and members of the public who may wish to participate in the proceedings.

The OCA requests that the July 29, 2027, Public Meeting be used to set the litigation schedule because it will produce a reasonable schedule that will provide the parties and members of the public with a meaningful opportunity to be heard and to develop a robust evidentiary record. Accordingly, the OCA requests that flexibility in scheduling be adopted to accommodate the legitimate need for adequate time to hold Public Input Hearings (PIHs) and develop a robust evidentiary record in these proceedings. As explained further below, this request (1) is made with full support or without objection from other parties, (2) is permissible under the plain language of the statute, and (3) is in the public interest and promotes due process and judicial economy for parties, consumers, and members of the public who wish to testify at a PIH and for the parties of record who wish to submit written testimonies and briefs.

Using the July 29, 2027, public meeting, the OCA proposes the following unopposed schedule for the ALJs to adopt:

Recommended Litigation Schedule for the ALJs to Adopt

Event	**Proposed Dates**	**Days Between**
Prehearing Conference (PHC)	November 3, 2026	
Public Input Hearings (PIHs) options	January 5, 6, 7, 2027 January 12, 13, 14, 2027	63 days (between PHC and Jan. 5)
Direct Testimony (All Parties, All Issues)	Thursday, January 14, 2027	72 days (between PHC and Jan. 14)
Supplement Direct (Limited to Public Input Hearings)	Tuesday, February 2, 2027	19 days (between last PIH and Feb. 2.)
Rebuttal Testimony (all parties and all issues)	Friday, February 12, 2027	29 days (between Direct and Feb. 12)
Surrebuttal Testimony (all parties and all issues)	Friday, March 5, 2027	21 days
Written Rejoinder (PPL only as to Petition; OCA only as to Amended Complaint)	Thursday, March 11, 2027	6 days
Evidentiary Hearings	Tuesday, March 16, 2027, through Thursday, March 18, 2027	5 days
Main Briefs	Thursday, April 8, 2027	23 days
Reply Briefs	Friday, April 23, 2027	21 days
End of Suspension Period	July 20, 2027	9 months from Amended Complaint
Public Meeting for Final Order	July 29, 2027	9 days (between end of suspension period and Public Meeting date)

The ALJs should adopt this proposed schedule for the following reasons. First, the OCA recognizes that requesting the use of a public meeting date after the end of the suspension period raises the potential for refunds under Section 1309(b). However, importantly, all parties, including PPL Electric, which is the party with the burden of implementing refunds, if any, have either agreed or not objected to the use of the July 29, 2027, public meeting date for setting a litigation schedule of the consolidated proceedings.

Second, the request to use the July 29th public meeting to set the litigation schedule is not prohibited by the plain language of Section 1309. The plain language of Section 1309(b) establishes a nine-month suspension period and expressly contemplates the possibility of the Commission entering a final order after the end of the suspension period, for any reason, and provides that the consequences for doing so would be, simply, to make any refunds retroactive to the end of the suspension period..[25] Thus, the plain language of statutory deadline under Section 1309 does not prevent the Commission from accommodating legitimate scheduling needs to protect the public interest and due process rights of all parties, so long as refunds, if any, are retroactive back to the end of the suspension period.[26]

Finally, the request to use the July 29th public meeting date to set the litigation schedule is in the public interest and promotes judicial economy for consumers and members of the public who wish to testify at a PIH and for the parties of record who wish to submit written testimonies and briefs and otherwise participate in evidentiary hearings. While the OCA explains the reasons below, the OCA presents what a litigation schedule would look like using the June 10th and July 8th public meeting dates:

[25] *See* 66 Pa. C.S. § 1309(b).
[26] *Id*.

Non-Preferred Litigation Schedule Based on the June 10, 2027 Public Meeting:

Event	Deadline	Days between
PHC	November 3, 2026	
PIHs	Nov. 23, 24 Dec. 1, 2, 3	20 days (between PHC and Nov. 23)
Direct (all parties, all issues)	Thursday, December 10, 2026	37 days (between PHC and Dec. 10) 7 days (between last PIH and Dec. 10)
Rebuttal (all parties, all issues)	Thursday, January 7, 2027	28 days
Surrebuttal (all parties, all issues)	Thursday, January 28, 2027	21 days
Written/Oral Rejoinder (OCA and PPL Electric only)	Tuesday, February 2, 2027	5 days
Hearings	Thursday, February 4, 2027 Friday, February 5, 2027	2 days
Main Brief	Monday, February 22, 2027	17 days
Reply Brief	Friday, March 5, 2027	11 days
Public Meeting	June 10, 2027	
End of Suspension Period	July 20, 2027	40 days (between Public Meeting and end of suspension period)

Non-Preferred Litigation Schedule Based on the July 8, 2027 Public Meeting

Event	Deadline	Days between
PHC	November 3, 2026	
PIHs	Dec. 1, 2, 3, Dec. 8, 9, 10	28 days (between PHC and December 1)
Direct (all parties, all issues)	Friday, January 8, 2027	66 days (between PHC and Dec. 10) 29 days (between last PIH and Dec. 10)
Rebuttal (all parties, all issues)	Friday, February 5, 2027	28 days
Surrebuttal (all parties, all issues)	Thursday, February 25, 2027	20 days
Written/Oral Rejoinder (OCA and PPL Electric only)	Tuesday, March 2, 2027	5 days
Hearings	Wednesday March 3, 2027 Thursday, March 4, 2027	1 day
Main Brief	Monday, March 22, 2027	17 days
Reply Brief	Friday, April 2, 2027	11 days
Public Meeting	July 8, 2027	
End of Suspension Period	July 20, 2027	12 days (between Public Meeting and end of suspension period)

Regarding PIHs, the Commission's policy statement provides: "To allow an opportunity for the complete airing of concerns expressed or issues raised by consumers, public input sessions should be held as early as is practical during the course of the proceeding."[27] In PPL Electric's 2025 rate case, many consumers and public officials testified at PIHs about data centers.[28] Given that utility service to data centers are an important issue to utility consumers and the public, combined with the vast service territory of PPL Electric, the OCA anticipates that multiple in person and telephonic PIHs are needed in the consolidated proceeding. Using the July 29, 2027 public meeting date will permit the scheduling of PIHs after New Year's. In contrast, using a June 10, 2027, public meeting date could necessitate PIHs be held the week of Thanksgiving and immediately after, and using the July 8, 2027, public meeting could necessitate the scheduling of PIHs the week immediately following Thanksgiving week, which also is the first week of Pennsylvania's statewide buck season, a deep-seated cultural tradition among Pennsylvanians. Thus, a schedule based on a June 10, 2027, and July 8, 2027, public meetings is impracticable and not in the public interest to accommodate the holding of PIHs. PIHs should be a meaningful opportunity for consumers to have their voices be heard. The proposed litigation schedule attempts to keep the rounds of testimony simplified given the amount of public interest in these proceedings.

The issues presented in the Petition and Formal Complaint proceedings involve complex, highly technical information. The OCA anticipates that multiple rounds of discovery will be required to fully present its case before the Commission. The number of days between the Prehearing Conference and the direct testimony is 72 days, and the number of days between the last PIH and supplemental direct testimony is 19 days, giving all parties adequate time to develop

[27] 52 Pa. Code § 69.321(c).
[28] Pa PUC v. PPL Electric Utilities Corporation, Docket Nos. R-2025-3057164 et. al., Recommended Decision at 18-26 (April 17, 2026).

and submit written direct testimony addressing complex, highly technical issues of great importance to the public interest and written supplemental direct testimony addressing the testimony from the PIHs.

Furthermore, under a consolidated proceeding, the OCA will bear the burden of proof for all aspects of its Amended Complaint while PPL Electric will bear the burden of proof for all aspects of its Petition. Under the OCA's proposed schedule, all parties will have the opportunity to submit direct, rebuttal and surrebuttal testimonies of all issues on the same date. There is no need for the OCA or PPL Electric to present direct testimony before the other parties to this proceeding. In large part, this is because the OCA has provided adequate information in sworn affidavits in its Amended Complaint, providing all parties sufficient information to provide direct testimony on the issues outlined in the OCA's Amended Complaint. Further, under the proposed schedule, the OCA and PPL Electric will provide written rejoinder on the same day as to their respective pleadings on which they bear the burden of proof: that is, the OCA will be limited in providing rejoinder testimony only on issues related to its Amended Complaint, and PPL Electric will present rejoinder testimony on issues exclusively related to its Petition. The OCA's proposed schedule eliminates the needs of extra rounds of testimony, such as other party direct or surrejoinder, which promotes judicial economy and due process for all.

In contrast, under the June 10th public meeting date creates a condensed schedule, which severely limits all parties ability to engage in discovery which will hinder the parties ability to present sufficient direct testimony, and the time between direct testimony and rebuttal will occur over the December holiday season as well as New Year's, much to the disadvantage and undue burden to the litigating parties. While the OCA does not anticipate objections to interrogatories or motions to compel, under a schedule using the June 10th public meeting date, there arises a

possibility of a motions hearing the week of Christmas. Using a July 8, 2027, public meeting date would not materially improve these problems. A Public Meeting date of July 8, 2027, would disadvantage the parties ability to present direct testimony and present suitable reply briefs because direct testimony is due directly after the December and New Year's holiday season and the Easter holiday weekend will occur in the middle of the reply brief period. These scheduling issues can easily be avoided through the adoption of a schedule using the July 29th public meeting date.

Using the July 29th public meeting date will avoid all of the problems presented herein and allow the parties, the ALJs, and consumers the full benefit of a meaningful opportunity to participate. In summary, the ALJs should adopt the OCA's proposed litigation schedule using the July 29th public meeting date because the request (1) is made with support of, or without objection from, other parties, (2) is permitted under the plain language of the statute, and (3) is in the public interest and promotes due process and judicial economy for consumers and members of the public who wish to testify at a PIH and for the parties of record who wish to submit written testimonies and briefs.

VII. PUBLIC INPUT HEARINGS

Given the substantial amount of public outcry about data centers in PPL Electric's 2025 Rate Case[29] and the size of PPL Electric's customer base and service territory, the OCA respectfully requests that at least six PIHs be held, four in-person and two telephonic.

Attached as **Appendix A** is the OCA's proposed draft Notice for the Public Input Hearing (to be completed with details as determined by the presiding ALJ).

If it is determined that PIHs will occur in this proceeding the OCA specifically requests the following for PIHs:

[29] Pa PUC v. PPL Electric Utilities Corporation, Docket Nos. R-2025-3057164 et. al., Recommended Decision at 18-26 (April 17, 2026).

A. Given the size of the customer base and service territory, a total of six (6) Public Input Hearings be held, four in-person and two telephonic spread over separate days and with a variety of morning, afternoon, and evening sessions.

B. The in-person public input hearings include a combination of daytime and evening hearings at a location with accessible and free parking or easy access to public transportation.

C. The telephonic public input hearings include a combination of daytime and evening hearings.

D. Pre-registration be either encouraged or required for telephonic hearings only, and if required, pre-registration be required by 10:00 a.m. on the day of the telephonic Public Input Hearing at which the witness seeks to testify.

E. Hearing exhibits, such as cross examination exhibits and a list of evidence to be moved into the record (i.e., a party's list of pre-served testimony and exhibits), be required to be submitted to the ALJ by 10:00 a.m. the day before the Public Input Hearing at which the witness seeks to testify.

F. The Commission's notice of the Public Input Hearings will include the phone numbers and access codes necessary for participants to use to fully access all telephonic Public Input Hearings.

G. The Company will be required to, at a minimum, generate a notice of the Public Input Hearings that contains are relevant information as to date, time, location, and phone numbers and access codes and further be required to advertise the notice: (1) in the general readership section (not legal section) of local newspapers within the service territory; (2) on its website; and (3) in social media posts which the Company utilizes to advertise generally.

H. That the other parties involved in the proceeding, including the OCA, be permitted to review these public input announcements prior to their publication and distribution and have input into which publications the ads are placed.

I. In addition to the Company publishing the notice in a newspaper of general circulation for its service territories, the OCA respectfully requests that the Company post notice of the public input hearings on all of their social media platforms at least twice per week during each week prior to the scheduled dates of the public input hearings.

J. The Company be directed to send notice of the public input hearings via a bill insert during a billing cycle to occur shortly after this prehearing conference and prior to the scheduled dates of the public input hearings.

VIII. SERVICE ON THE OCA

The OCA respectfully requests that the Presiding Officer permit electronic service without the requirement of a follow-up hard copy. The OCA requests that the dates included in any litigation schedule in this matter be considered "in-hand" dates and that electronic service on the due date will satisfy the "in-hand" requirement.

The OCA will be represented in this case by the attorneys listed below.

Melanie El Atieh, Deputy Consumer Advocate
Jacob Guthrie, Assistant Consumer Advocate
Katherine "Katie" Kennedy, Assistant Consumer Advocate
Ryan Morden, Assistant Consumer Advocate
Crystal Zook, Assistant Consumer Advocate
Olivia Spergel, Assistant Consumer Advocate
Johnathan Longhurst, Assistant Consumer Advocate

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
E-Mail: OCA PPL1309@paoca.org

The OCA has created a group e-mail address provided above. This is the only email address that is required for service on the OCA. The OCA's group email address will provide the emailed materials to all members of the OCA team including the consultants listed above.

The OCA also requests that the ALJ(s) instruct the parties on the record as to whether consumers who have filed formal rate complaints in this proceeding should be included on the official service lists if those complainants have not indicated either at the prehearing conference, or prior to the prehearing conference, that they wish to be active parties to this proceeding.

IX. DISCOVERY

In conjunction with its proposed schedule, the OCA proposes the following modifications to the Commission's procedural rules regarding discovery. The OCA requests that the Presiding Officers direct that the modifications will take effect when addressed during the on the record

prehearing conference and apply to all future discovery requests served on and after the date of the prehearing conference November 3, 2026. The OCA also requests that any outstanding interrogatories or requests for admissions are due no later than 10 calendar days after the Prehearing Conference to the extent such responses are due later than such date, in accordance with Paragraph A below.

A. Answers to written interrogatories and requests for document production, entry for inspection, or other purposes shall be served in-hand within ten (10) calendar days of service.

B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within three (3) calendar days of service of the interrogatories; unresolved objections shall be served in writing to the propounding party within five (5) calendar days of service of the interrogatories and/or requests for production.

C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within five (5) business days of service of written objections.

D. Answers to motions to dismiss objections and/or answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.

E. Requests for admissions will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) calendar days of service.

F. Answers to on-the-record data requests shall be served in-hand within five (5) calendar days of the requests.

G. Any discovery or discovery-related pleadings (such as objections, motions, and answers to same) served after served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day before a holiday will be deemed to have been served on the next business day for purposes of calculating the due date for any responsive filing.

After rebuttal is served, the OCA proposes that the deadlines should be reduced as follows:

A. Answers to interrogatories and responses to requests for document production, entry for inspection, or other purposes shall be served within five (5) calendar days of service of the interrogatories or requests for production.

B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within two (2) calendar days of service; unresolved objections shall be served on the propounding party in writing within three (3) calendar days of service of the interrogatories and/or requests for production.

C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of written objections.

D. Answers to motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.

E. Requests for admission shall be deemed admitted unless answered or objected to within three (3) calendar days of service.

F. Discovery requests and discovery related pleadings (such as objections, motions, and answers to same) served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day preceding a holiday shall be deemed to have been served on the next business day.

X. PREHEARING PROCEDURES

At the Prehearing Conference, the OCA requests an on-the-record discussion regarding font size requirements and page limitations for briefing.

The OCA requests that the ALJs in their Prehearing Conference Order and Evidentiary Hearing Notice clarify that:

A. Evidentiary hearing exhibits need not include all pre-served testimony which is circulated to the ALJs and parties in this proceeding in accordance with the above-referenced procedural schedule. However, such pre-served testimony may be identified for movement into the record at the hearing through an inventory of pre-served testimony which is provided as a hearing exhibit.

B. Evidentiary hearing exhibits may be provided to the ALJs and parties by 10am the day before the start of evidentiary hearings with the exception of hearing exhibits related to rejoinder which may be provided by the end of the day on same day.

XI. SETTLEMENT

The OCA will participate in settlement discussions in this matter.

XII. COMMON BRIEFING OUTLINE

The OCA requests that, when the ALJs issue their Instructions for Briefs, the common outline provided by the ALJs will include A Roman numeral-level header for an Overall Position of the case.

Respectfully submitted,

/s/ Melanie Joy El Atieh
Melanie Joy El Atieh
PA Bar ID # 209323
Deputy Consumer Advocate

Assistant Consumer Advocates
Jacob Guthrie
PA Bar ID # 334367

Katherine "Katie" Kennedy
PA Bar ID # 317237

Olivia Spergel
PA Bar ID # 337929

Crystal M. Zook
PA Bar ID # 334159

Ryan Morden
PA Bar ID # 335679

Johnathan M. Longhurst
PA Bar ID # 338157

Email: OCAPPL1309@paoca.org

Counsel for:
Darryl A. Lawrence
Consumer Advocate

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
(717) 783-5048

DATED: October 30, 2026

OCA APPENDIX A

NOTICE OF IN-PERSON AND TELEPHONIC PUBLIC INPUT HEARINGS

For [Company Name] Rate Increase Requests

Docket Nos.
R-[--]
R-[--]

The Pennsylvania Public Utility Commission (PUC) will conduct [#] Public Input Hearings concerning the Office of Consumer Advocates filing against PPL concerning the interconnection of large load data centers. The in-person and telephonic hearings will be held at the following times and places:

Presiding Officer: Administrative Law Judge [Name of Judge]

IN-PERSON PUBLIC INPUT HEARINGS
Pre-registration is not required.

Date: [Here]
Time: [Here]
Location: [Here]

Date: [Here]
Time: [Here]
Location: [Here]

Date: [Here]
Time: [Here]
Location: [Here]

Date: [Here]
Time: [Here]
Location: [Here]

TELEPHONIC PUBLIC INPUT HEARINGS
Pre-registration is [encouraged/required]. Read below.

Date: [Here]
Time: [Here]
Pre-registration is [encouraged/required] by [same day] at 10AM.

Date: [Here]
Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Toll-free Conference Number: xxx.xxx.xxxx
PIN Number: xxxxxxxx

- You must dial the toll-free Conference number above
- You must enter the PIN number above when instructed
- You must speak your name when prompted, and press #
- Then, the telephone system will connect you to the hearing

PRE-REGISTRATION FOR TELEPHONIC PUBLIC INPUT HEARINGS: To testify at the telephonic Public Input Hearings, pre-registration is [encouraged/required] by [day of the hearing] at 10AM. Failure to pre-register could result in you not being called to testify by the PUC judge. To pre-register to testify by telephone, please contact the PUC Judge's Legal Assistant, [name], by email at [email address] or by phone at [xxx.xxx.xxxx] and provide the requested information.

NEED ASSISTANCE WITH PRE-REGISTRATION? If you need assistance pre-registering to testify, you may have someone register for you, but they will need to provide the PUC Judge all the information listed above. Additionally, if more than one person in your household would like to testify, one person may pre-register for other individuals in the same household by providing the PUC Judge's Legal Assistant with the above-listed information for each individual.

REQUESTS FOR INTERPRETERS: If you require an interpreter, please pre-register as soon as possible. If you register too close to the hearing date, we may not have enough time to arrange for an interpreter. If you request an interpreter, the PUC will make reasonable efforts to have one present. AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

HEARING EXHIBITS: If you have any hearing exhibits to which you will refer during the hearing, please email them to the PUC Judge's Legal Assistant, [name], at [email address]. The PUC Judge will forward your exhibits to all the parties. Exhibits for the public input hearing must be received by the PUC Judge by [the day before the hearing] at 10AM.

QUESTIONS? The Pennsylvania Office of Consumer Advocate (OCA) represents the interests of utility customers before the PUC. If you have questions about the public input hearings or the Company's requested rate increase, please contact the OCA toll free at 1-800-684-6560 or by email at consumer@paoca.org. Additionally, the OCA can help customers pre-register for the Public Input Hearings.

OTHER WAYS TO BE HEARD: If you want to be heard about the proposed rate increase but do not want or cannot testify at the Public Input Hearings, you may file a formal complaint or comment to the proposed rate increase. Please visit the PUC's website to use the applicable form available at https://www.puc.pa.gov/complaints/formal-complaints/