PULP
PENNSYLVANIA
UTILITY LAW PROJECT

October 30, 2026

Via E-Mail Only
Honorable John M. Coogan
Honorable Erin L. Gannon
Pennsylvania Public Utility Commission
301 Fifth Avenue, Suite 220,
Pittsburgh, PA 15222
jcoogan@pa.gov
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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 Amendment of Its Default Service Program and Procurement Plan for the Period June 1, 2025, through May 31, 2029

Petition of PPL Electric Utilities Corporation for Waiver of Any and All Regulations Necessary to Implement the Company's Proposals

Docket Nos. P-2026-3065185; P-2024-3047290; P-2026-3065186

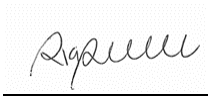
Prehearing Memorandum of CAUSE-PA

Your Honors:

Please find the attached **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,



Ria Pereira, Esq.
Counsel for CAUSE-PA

CC: Secretary Matthew Homsher (via E-file)
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 Electric Generation Supplier Coordination Tariff	:	Docket No. P-2026-3065185
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PREHEARING MEMORANDUM OF THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN PENNSYLVANIA

PENNSYLVANIA UTILITY LAW PROJECT
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October 30, 2026

On October 14, 2026, a Prehearing Conference Order was issued by the Honorable Administrative Law Judges (ALJs) John M. Coogan and Erin L. Gannon setting a telephonic/ virtual prehearing conference for Tuesday, November 3, 2026 at 10:00 a.m., and requiring parties to file a Prehearing Memorandum no later than Friday, October 30, 2026 at 4:30 p.m. In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Memorandum.

I. Background

On September 14, 2026, PPL Electric Utilities Corporation (PPL) filed a 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, Changes to its Electric Generation Supplier Coordination Tariff, Amendment of its Default Service Plan, and Any Necessary Waivers of Commission Regulations (herein, collectively, Petition).

In its Petition, PPL requests Commission approval of (1) a 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) elimination of its Transmission Service Charge (TSC); (3) changes to the Generation Supply Charges to include costs currently recovered under the TSC that will not be recovered through the CPTR, along with associated net over or undercollection balance; (4) proposed changes to PPL's existing Default Service Program and Procurement Plan (DSP VI) to incorporate proposed programmatic and process changes; (5) proposed changes to the Company's 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 CPTR proposal; and (6) waivers of any and all Commission regulations that are needed to implement PPL's proposals.

On October 5, 2026, CAUSE-PA filed a Petition to Intervene and Answer in the above-captioned proceeding, in which CAUSE-PA respectfully requests that the Commission enter an order granting CAUSE-PA full status as an intervener in this proceeding with active party status.

II. Issues to be Presented

CAUSE-PA has preliminarily reviewed PPL's CPTR Petition and is deeply concerned that, absent additional reforms, PPL's CPTR proposals may have a disproportionately harmful impact on PPL's low and moderate income customers. CAUSE-PA is also concerned that PPL's requested relief is insufficient to hold large load users responsible for the costs which they have already caused and will continue to cause, driving higher prices for PPL's low and moderate income customers.

CAUSE-PA has conducted an initial review of PPL's CPTR Petition and has identified the following specific issues of concern, which must be addressed in this proceeding to ensure that residential low and moderate income customers are protected from the impacts – including the cost impacts from data centers and other large load users -- though it reserves the right to raise additional issues which may arise through the course of this proceeding:

1. Whether PPL's CPTR proposal would provide for equitable recovery of Network Integration Transmission Service (NITS) costs and certain other transmission-related expenses to data center and other large load customers;

2. Whether the Commission can approve PPL's CPTR proposals to be inclusive of distribution, transmission, and generation charges, or if a separate non-bypassable rider

for Reliability Backstop Procurement (RBP) and Interim Resource Adequacy Service (IRAS) costs is necessary;

3. Whether PPL's CPTR proposal fails to set forth a clear methodology for determining costs which would not have been incurred but for large load customers ("but for" costs) so that such costs can be properly identified and assigned to PPL's LP-6 rate class.

4. Whether PPL's proposals fail to appropriately account for the impact of large load users on PPL's low and moderate income customers, specifically, as well as the impact on universal service programs and associated costs that are ultimately borne by PPL's residential ratepayers. These impacts include the direct increase in costs for a majority of PPL's low and moderate income customers not enrolled in PPL's Customer Assistance Program (CAP), the degradation of benefits available through PPL's CAP resulting from the erosion of maximum CAP credits, and the increased costs to PPL's universal service programs based on the difference between CAP customer payments and full tariff rates. CAUSE-PA is also concerned that PPL's proposed tariff revisions would fail to protect PPL's low and moderate income customers from transmission costs incurred as a result of large load users;

5. Whether PPL's proposals to eliminate its current Transmission Service Charge (TSC) in coordination with establishing its proposed CPTR would result in unjust, unreasonable, and/or unduly discriminatory preferential rates, in violation of the Public Utility Code;

6. Whether PPL's proposed tariff revisions, and revisions to its default service plan (DSP) for the period of June 1, 2025 through May 31, 2029, to effectuate its Petition proposals should be approved, as proposed;

7. Whether PPL's requested regulatory waivers which PPL avers are necessary to effectuate its Petition proposals should be approved;

8. The impacts of PPL's Petition proposals on customers who purchase electricity from competitive suppliers;

CAUSE-PA asserts that these matters, along with issues set forth throughout PPL's CPTR Petition and any additional issues raised by intervening parties or through further investigation in this matter, must be thoroughly reviewed and investigated to ensure that PPL's low and moderate income customers are protected from the continued impacts of large load customers and so that they can access reliable, safe, and affordable electric services.

III. Consolidation of Proceedings

The Prehearing Conference Order in the Formal Complaint proceeding at Docket No. C-2026-3065756 directed parties to address their positions on consolidation of the Complaint proceeding with the present proceeding. CAUSE-PA supports consolidation of these two proceedings.

IV. Witnesses and Testimony

CAUSE-PA intends to present the following witness to testify in this matter, but reserves the right to call additional or substitute witnesses as may be warranted upon proper notice to Your Honors and the parties:

Patrick Cicero
118 Locust Street
Harrisburg, PA 17101
pcicero@pautilitylawproject.org

Mr. Cicero will address the issues identified above, and their impacts on PPL's low and moderate income customers, as well as other issues that may arise throughout this proceeding.

V. Discovery

CAUSE-PA supports the discovery modifications proposed by the Office of Consumer Advocate (OCA).

VI. Public Input Hearings

CAUSE-PA supports the scheduling of public input hearings in this matter. CAUSE-PA recommends that the Commission consider the use of telephonic and in-person public input hearings to encourage participation by the consumers.

VII. Settlement

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourages the parties to engage in settlement discussions early in the process.

VIII. Service on CAUSE-PA

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. All documents should be served on CAUSE-PA as follows:

Ria M. Pereira, Esq., PA ID: 316771
Levi A. Phillips, Esq., PA ID: 338477
John W. Sweet, Esq., PA ID: 320182
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CAUSE-PA requests that parties agree to electronic service in this proceeding.

IX. Representation of CAUSE-PA at Prehearing Conference

At the Prehearing Conference, CAUSE-PA will be represented by Ria M. Pereira, Esq.

X. Litigation Schedule

CAUSE-PA is currently involved in discussions with the Company and other parties to reach a mutually agreeable litigation schedule. CAUSE-PA recognizes that the Prehearing Conference Order indicates that a litigation schedule in this matter must include a reply brief date no later than February 26, 2027. As noted above, CAUSE-PA supports consolidation of the instant proceeding with this Petition proceeding. Through its Motion filed on October 29, 2026, PPL requests consolidation of the CPTR Petition and OCA Complaint proceedings, and to waive the Commission's regulations at 52 Pa. Code § 54.185(b) to target the July 29, 2027 public meeting date for the Commission's Final Order. CAUSE-PA supports this approach and respectfully requests that the ALJs permit the consolidated matter to be considered by the Commission's July 29 public meeting date. CAUSE-PA will coordinate with the parties to this proceeding related to a procedural schedule once an ultimate decision is made about the applicable public meeting date.

WHEREFORE, CAUSE-PA respectfully submits this Prehearing Memorandum.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA

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Certificate of Service

I hereby certify that I have this day served copies of the **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

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