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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; Docket No. P-2026-3065185

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-2026-3065186

Petition of PPL Electric Utilities Corporation for Waiver of Any and All Regulations Necessary to Implement the Company's Proposals; Docket No. P-2024-3047290

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

PREHEARING CONFERENCE MEMORANDUM

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Conference Memorandum of Amazon Data Services, Inc. ("Amazon") in the above-captioned matter. Copies of the Memorandum have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact my office.

Very truly yours,
/s/ Whitney E. Snyder
Whitney E. Snyder
Todd S. Stewart
Counsel for Amazon Data Services, Inc.

WES/TSS/jld
Enclosure
cc: Administrative Law Judge John M. Coogan (via electronic mail)
Administrative Law Judge Erin L. Gannon (via electronic mail)
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
Petition of PPL Electric Utilities Corporation for Waiver of Any and All Regulations Necessary to Implement the Company's Proposals	:	Docket No. P-2024-3047290
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-2026-3065186
Pennsylvania Consumer Advocate	:	
v.	:	Docket No. C-2026-3065756
PPL Electric Utilities Corporation	:	

PREHEARING CONFERENCE MEMORANDUM
OF
AMAZON DATA SERVICES, INC.

TO THE HONORABLE JOHN M. COOGAN:
TO THE HONORABLE ERIN L. GANNON:

Pursuant to 52 Pa. Code § 5.222 and the October 14, 2026, Prehearing Conference Order, Amazon Data Services, Inc. ("Amazon"), by counsel, submits this Prehearing Conference Memorandum.

I. INTRODUCTION

On September 14, 2026, PPL Electric Utilities Corporation ("PPL") filed a Petition for Approval of its Non-Bypassable Customer Protection Transmission Rider, Elimination if 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 (collectively, the "Petition").

On September 28, 2026, the Commission issued a secretarial letter ordering potential parties to file Petitions to Intervene on or before, October 23, 2026. On October 14, 2026, the Commission issued a Prehearing Conference Order that, among other things, directed each party to file and serve a Prehearing Conference Memorandum on October 30, 2026. *See* Prehearing Conference Order at ¶ 1.

Amazon filed a timely Petition to Intervene in this proceeding on October 23, 2026, as well as a Motion for Admission *Pro Hac Vice* of Brian Greene and Simeon Brown.

On October 29, 2026, PPL filed a Motion to Consolidate this matter with *Pennsylvania Consumer Advocate v. PPL Elec. Utilities Corp*., Docket No. C-2026-3065756.

II. IDENTIFICATION OF ISSUES

Amazon is still formulating its positions in this case. Based upon an initial review of the Petition, Amazon expects the potential issues in this proceeding will include ensuring that PPL's proposed Rider CPTR and related documents:

1. Result in a transparent and fair allocation of the costs of large load interconnections, and related ongoing operation and maintenance costs, in a manner that: (a)

requires large load customers to pay their cost of service and; (b) avoids cross-subsidization with other customer classes;

2. Encourage economic development in Pennsylvania;

3. Maintain affordable and reliable electricity service for all customer classes; and

4. Provide increased transparency to PPL and its customers into PPL's recovery of upstream transmission facilities costs.

Consistent with the above goals and issues, Amazon may address: (1) the allocation of costs to the LP-6 customer class; (2) how the upstream transmission costs are calculated and included in Rider CPTR; (3) the reasonableness of a credit or refund mechanism if other customer classes utilize the transmission facilities that are paid for by the LP-6 class through Rider CPTR; and (4) opportunities to support, encourage and reward investments that improve the reliability, resilience and affordability of Pennsylvania's transmission grid.

Amazon may identify other issues after reviewing the testimony to be submitted by the parties, answers to discovery, and so forth. Amazon reserves the right to address additional issues it identifies during the course of this proceeding.

III. IDENTIFICATION OF WITNESSES

Amazon reserves the right to present direct, rebuttal, and surrebuttal fact and expert testimony, to the extent it deems necessary, in this proceeding. At this time, Amazon is considering whether to present a witness to testify regarding the above-identified issues and, if so, who that witness will be. Promptly after those decisions are made, Amazon will notify the Administrative Law Judge and all parties if it will call a witness and, if so, who it will be.

IV. SETTLEMENT

Amazon is interested in settling as many issues as possible and will work with PPL and the other parties to establish consensus. Amazon respectfully requests to take part in any and all settlement discussions that take place in this matter.

V. PROCEDURAL SCHEDULE

Amazon will cooperate with the parties to develop a reasonable procedural schedule that allows the issues in the case to be fully addressed. At this time, Amazon supports consolidating this case with the case of *Pennsylvania Consumer Advocate v. PPL Elec. Utilities Corp*., Docket No. C-2026-3065756. Amazon will work with the ALJ and the parties to establish procedures and a schedule for discovery for a consolidated proceeding.

VI. SERVICE ON AMAZON

Amazon consents to accept electronic delivery documents on the deadline for their filing. Amazon also requests that parties serve electronic (and not paper) copies of all documents in this proceeding on Amazon's counsel:

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VII. PETITION TO INTERVENE AND *PRO HAC VICE* MOTION

On October 23, 2026, Amazon filed a Petition to Intervene stating its interest in this proceeding as a customer of PPL. Amazon respectfully requests its Petition to Intervene be considered at the prehearing conference by asking if any parties oppose the petition and intend to

file an answer opposing Amazon's intervention by the November 12, 2026 deadline or granting the petition if no parties indicate they will oppose.

On October 23, 2026, Amazon filed a Motion for Admission *Pro Hac Vice* of Brian Greene and Simeon Brown. Amazon respectfully requests its Motion for Admission *Pro Hac Vice* be considered at the prehearing conference by asking if any parties oppose the motion and setting a deadline for filing responses by any such opposing parties or granting the motion if no parties oppose.

VIII. CONCLUSION

WHEREFORE, Amazon respectfully requests that its Prehearing Memorandum in this proceeding be entered into the record.

Respectfully submitted,

/s/ Whitney E. Snyder

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Counsel for Amazon Data Services, Inc.

Dated: October 30, 2026

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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DATED: October 30, 2026