McNees

October 30, 2026

**VIA ELECTRONIC FILING**

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
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-2024-3047290**

**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**

Dear Secretary Homsher,

Attached for filing with Pennsylvania Public Utility Commission is the Prehearing Memorandum of the PP&L Industrial Customer Alliance ("PPLICA"), in the above-referenced proceedings.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Very truly yours,



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Counsel to the PP&L Industrial Customer Alliance

c: Administrative Law Judge John M. Coogan (via email)
Administrative Law Judge Erin L. Gannon (via email)
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing documents upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

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Adeolu A. Bakare

Counsel to the PP&L Industrial Customer Alliance

Dated this 30th day of October, 2026, in Harrisburg, Pennsylvania.

**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 Amendment of Its Default Service Program and Procurement Plan for the Period June 1, 2025, through May 31, 2029 | : | Docket No. P-2026-3047290 |
| 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 |

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**PREHEARING MEMORANDUM**
**OF THE PP&L INDUSTRIAL CUSTOMER ALLIANCE**

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As requested by Administrative Law Judge ("ALJ") John M. Coogan and Erin L. Gannon in the Prehearing Conference Order dated October 14, 2026, the PP&L Industrial Customer Alliance ("PPLICA") hereby submits this Prehearing Memorandum.

## I. HISTORY OF THE PROCEEDING

On September 14, 2026, PPL Electric Utilities ("PPL") filed the Petition ("CPTR Petition") with the Pennsylvania Public Utility Commission ("PUC" or "Commission"), requesting approval of: (1) a new non-bypassable Customer Protection Transmission Rider ("CPTR") to recover Network Integration Transmission Service ("NITS") costs and certain other transmission costs and to allocate to Rate LP-6 those costs PPL would not have incurred but for the interconnection of

large load customers; (2) elimination of the Transmission Service Charge ("TSC"); (3) changes to the Generation Supply Charges to absorb the TSC costs not recovered through the CPTR; (4) an amendment of PPL's Default Service Program and Procurement Plan ("DSP VI"); (5) related changes to PPL's Retail Tariff and Electric Generation Supplier Coordination Tariff ("Supplier Tariff"); and (6) waivers of any Commission regulations necessary to implement these proposals.

On September 21, 2026, the Office of Small Business Advocate ("OSBA") filed a Notice of Appearance.

On October 2, 2026, the Office of Consumer Advocate ("OCA") filed a Public Statement and Answer with New Matter to the CPTR Petition and the OSBA filed a Notice of Intervention, Public Statement, and Verification.

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 the CPTR Petition.

On October 8, 2026, the Regenerative Energy Initiative ("REI") filed a Petition to Intervene.

On October 14, 2026, a Prehearing Conference Notice and a Prehearing Conference Order were issued scheduling the Prehearing Conference for Tuesday, November 3, 2026.

On October 20, 2026, a second Prehearing Conference Notice was issued, stating that the Prehearing Conference for the CPTR Petition would be held contemporaneously with the Prehearing Conference for OCA's 1309 Complaint, due to the anticipated overlapping of issues and parties in both proceedings. The OCA filed a 1309 Complaint on October 6, 2026 at Docket No. C-2026-3065756.

PPLICA filed an Answer to PPL's Petition on October 21, 2026. A description of PPLICA is set forth in Paragraph 6 of PPLICA's Answer.

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. That same day PPL filed an Answer to OCA's New Matter.

On October 23, 2026, Governor Josh Shapiro, Constellation Energy Generation, LLC and Constellation NewEnergy, Inc. ("Constellation"), Citizens' Electric Company of Lewisburg, PA ("Citizens"), and Amazon Data Services, Inc. ("Amazon") filed Petitions to Intervene. In addition, the Retail Energy Supply Association ("RESA") filed a Petition to Intervene and Answer to the CPTR Petition.

## II. IDENTIFICATION OF LEAD ATTORNEY

For purposes of the Prehearing Conference, Adeolu A. Bakare will speak as the lead attorney on behalf of PPLICA.

## III. ANTICIPATED ISSUES AND SUB-ISSUES

PPLICA's preliminary review of PPL's Petition indicates a need for Commission investigation into at least the following issues:

a) Whether the CPTR is just and reasonable;

b) Whether any proposed protections are adequately designed to mitigate and prevent shopping customers from paying for the NITS and certain other transmission costs both through their contracts with their Electric Generation Suppliers ("EGSs") and through the CPTR;

c) Whether the CPTR impermissibly and unfavorably impacts competitive market dynamics for electric generation supply;

d) Whether costs allocated to the CPTR could be recoverable from Rate LP-4 and LP-5 customers and result in cost subsidies for LP-6 customers;

e) Whether a system-wide, non-bypassable restructuring of transmission cost recovery is necessary or appropriate to address large load cost causation;

PPLICA anticipates pursuing these issues during this proceeding and reserves the right to raise further issues and to respond to all issues raised by other parties.

## IV. PROPOSED WITNESSES

PPLICA is presently evaluating whether to present a witness and sponsor testimony in this proceeding. If we determine a witness shall present testimony, PPLICA will immediately inform the parties and the ALJs of its intended witnesses and topics of testimony. PPLICA intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

## V. CONSOLIDATION

PPLICA does not oppose PPL Electric Utilities Corporation's Motion to Consolidate Proceedings and Waive the 9-Month Deadline Under 52 Pa. Code § 54.185(b).

## VI. PROPOSED SCHEDULE

PPLICA does not oppose the procedural schedule detailed below. This schedule is predicated on the approval of PPL's Motion to Consolidate Proceedings and Waive the 9-Month Deadline Under 52 Pa. Code § 54.185(b) and aligns with a procedural schedule put forth by the OCA and not objected to by any Party to either proceeding.

| **Event** | **Proposed Dates** |
|---|---|
| Prehearing Conference | November 3, 2026 |
| Public Input Hearings options | January 5, 6, 7<br>January 12, 13, 14 |
| Direct Testimony<br>(All Parties, All Issues) | Thursday, January 14, 2027 |
| Supplement Direct<br>(Limited to Public Input Hearings) | Tuesday, February 2, 2027 |
| Rebuttal Testimony<br>(All Parties, All Issues) | Friday, February 12, 2027 |
| Surrebuttal Testimony<br>(All Parties, All Issues) | Friday, March 5, 2027 |

| | |
|---|---|
| Written Rejoinder<br>(PPL only as to Petition; OCA only as to Amended Complaint) | Thursday, March 11, 2027 |
| Evidentiary Hearings | Tuesday, March 16, 2027, through Thursday, March 18, 2027 |
| Main Briefs | Thursday, April 8, 2027 |
| Reply Briefs | Friday, April 23, 2027 |
| End of Suspension Period | July 20, 2027 |
| Public Meeting for Final Order | July 29, 2027 |

## VII. POSSIBILITY OF SETTLEMENT

PPLICA is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

**McNEES WALLACE & NURICK LLC**

By 

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Dated: October 30, 2026