PennFuture

October 30, 2026

VIA E-FILE

Secretary Matthew L. Homsher
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 Waiver of Any and All Regulations Necessary to Implement the Company's Proposals
Docket Nos. 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 Nos. P-2024-3047290

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

Dear Secretary Homsher:

Enclosed please find the Prehearing Conference Memorandum of Environmental Intervenors in the above noted dockets.

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

If there are any questions regarding this filing, please contact me directly at 267.838.9154.

Respectfully submitted,

/s/ Emma H. Bast
Emma H. Bast, Esq.

cc: Administrative Law Judge John M. Coogan (*via email*)
Administrative Law Judge Erin L. Gannon (*via email*)
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-2026-3065186
Petition of PPL Electric Utilities Corporation for Amendment of Its Default Service Program and Procurement Plan for the Period June 1, 2025, through May 31, 2029	:	Docket No. P-2024-3047290
Pennsylvania Office of Consumer Advocate v. PPL Electric Utilities Corporation	:	Docket No. C-2026-3065756

PREHEARING CONFERENCE MEMORANDUM OF ENVIRONMENTAL INTERVENORS

Pursuant to the October 14, 2026, Prehearing Conference Order and the October 20, 2026, Prehearing Conference Order issued in the above-captioned matters, Environmental Defense Fund ("EDF"), Natural Resources Defense Council ("NRDC"), and Citizens for Pennsylvania's Future ("PennFuture") (collectively, "Environmental Intervenors") provide the following information:

I. Introduction

On or about September 14, 2026, PPL Electric Utilities Corporation ("PPL Electric" or the "Company") filed a Petition for Approval of Its Non-Bypassable Customer Protection

Transmission Rider ("CPTR"), Elimination of Its Transmission Service Charge ("TSC"), Changes to Its Generation Supply Charges, Changes to Its Retail Tariff, and Changes to Its Electric Generation Supplier Coordination Tariff at Docket No. P-2026-3065185. Together with that filing, PPL Electric filed its Petition of PPL Electric Utilities Corporation for Waiver of Any and All Regulations Necessary to Implement the Company's Proposals and 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 at Docket Nos. 2026-3065186 and P-2024-3047290 (collectively, "PPL CPTR Petition"). PPL Electric's filing seeks Commission approval to create a new non-bypassable CPTR to recover Network Integration Transmission Service ("NITS") costs and certain other transmission costs and to directly allocate incremental network upgrade costs caused by large load interconnections to Rate LP-6 customers.

On or about October 2, 2026, the Office of Consumer Advocate ("OCA") submitted a formal complaint, Formal Complaint of the Pennsylvania Consumer Advocate Regarding PPL Electric Utilities Corporation's Existing Rates and Service in Relation to Additions of Data Centers to the Utility's Electric Distribution System and the PJM Region, at Docket Number C-2026-3065756 ("OCA Complaint").

On October 14, 2026, an Order ("October 14 Order") was issued in the PPL CPTR Petition proceeding by Administrative Law Judge John M. Coogan and Administrative Law Judge Erin L. Gannon directing all parties to file and serve a Prehearing Conference Memorandum.

On October 22, 2026, Environmental Intervenors filed their Petition to Intervene in the PPL CPTR Petition proceeding.

On October 20, 2026, an Order ("October 20 Order") was issued by Administrative Law Judge John M. Coogan and Administrative Law Judge Erin L. Gannon in the OCA Complaint

proceeding directing all parties to file a Prehearing Conference Memorandum addressing, *inter alia*, their positions on consolidation of the PPL CPTR Petition and OCA Complaint proceedings.

On or about October 23, 2026, OCA filed an Amended Formal Complaint in the OCA Complaint docket ("OCA Amended Complaint").

On October 28, 2026, Environmental Intervenors filed their Petition to Intervene in the OCA Complaint proceeding.

II. Issues

Preliminarily, Environmental Intervenors have identified the following areas that require further consideration:

a. Whether PPL's standards for identifying computational large load customers are just and reasonable.

b. Whether the CPTR adequately protects existing customers from the risks of stranded assets, unrecovered costs, and cross-subsidization of large load customers by residential and other captive ratepayers.

c. Whether the CPTR's Customer Protection Transmission Demand ("CPTD") definition—limited to "charges that the Company incurs for transmission-related service"—adequately captures all relevant costs and whether the proposed LP-6 direct assignment methodology appropriately identifies costs "caused by or attributable to" large load customers.

d. How the "but-for" costs attributable to large loads are identified, and how those costs should be allocated to achieve just and reasonable rates.

e. Whether any pass-through mechanism under the CPTR adequately protects customers from uncertain future obligations arising from these proceedings.

f. Whether any impacts to the competitive retail market resulting from the CPTR will be just and reasonable.

g. Whether large load interconnection policies and transmission cost allocations resulting from these proceedings will support cost-effective clean energy.

h. Whether, and under what terms and conditions, computational large loads should be required to take mandatory interruptible service.

i. Whether and how PPL should require computational large loads to segregate critical and non-critical loads for curtailment priority purposes, and how PPL should enforce such requirements.

j. Whether and how PPL should approach, when evaluating the interconnection of a computational large load customer, the power quality, power availability, and reliability impacts to other customers from such interconnection.

k. The interplay between these proceedings and relevant proceedings in other jurisdictions, such as the Federal Energy Regulatory Commission; including the scopes of each such jurisdiction's legal authority.

Environmental Intervenors reserve the right to raise other issues as may arise during the course of the proceedings on further review, analysis, and discovery, and to respond to issues raised by other parties.

III. Witnesses

Environmental Intervenors intend to present direct, rebuttal, and surrebuttal testimony, as may be necessary, of:

Ron Nelson
Current Energy Group
2900 E Broadway Blvd
Ste 100 #780
Tucson, Arizona 85716
rnelson@currentenergy.group

Subjects: Computational large load identification; interruptible service and load flexibility; cost identification and allocation; customer protections; tariff language

Environmental Intervenors reserve the right to present testimony of other witnesses as may become necessary and appropriate over the course of the proceedings.

IV. Proposed Hearing and Briefing Schedule

Environmental Intervenors support the hearing and briefing schedule proposed by the Office of Consumer Advocates, as follows:

Public Input Hearings:	January 5, 6, 7, 12, 13, 14, 2027
Direct Testimony:	Thursday, January 14, 2027
(All parties, all issues)	
Supplemental Direct:	Tuesday, February 2, 2027
(Limited to Public Input Hearings)	
Rebuttal Testimony:	Friday, February 12, 2027
Surrebuttal Testimony:	Friday, March 5, 2027
Written Rejoinder:	Thursday, March 11, 2027
(PPL only as to CPTR Petition, OCA only as to Amended Complaint)	
Evidentiary Hearings:	Tuesday, March 16, 2027–Thursday, March 18, 2027
Main Briefs:	Thursday, April 8, 2027
Reply Briefs:	Friday, April 23, 2027

V. Discovery

Environmental Intervenors will give due consideration to any discovery modification proposed by any party.

Environmental Intervenors additionally request that any approved discovery modifications in this matter be considered effective as of the date of the prehearing conference, as opposed to the date of a subsequent Prehearing Order.

VI. Service

Environmental Intervenors will be represented by the attorneys listed below:

Emma H. Bast, Esq.
PA. I.D.: 330854
Jessica R. O'Neill, Esq.
PA. I.D.: 205934
Citizens for Pennsylvania's Future
1429 Walnut St.

Suite 701
Philadelphia, PA 19102
267.838.9154
bast@pennfuture.org
oneill@pennfuture.org

Michael Zimmerman, Esq.
PA. I.D.: 323715
Environmental Defense Fund
257 Park Ave. S.
New York, NY 10010
512.691.3444
mzimmerman@edf.org

In accordance with 52 Pa. Code § 1.54(b)(3)(i), Environmental Intervenors agree to accept electronic mail delivery of documents on the due date as satisfying the in-hand requirement.

In addition to email copies of pleadings, briefs, and exceptions, Environmental Intervenors request email copies of responses to discovery propounded by PPL Electric Corporation or any other party.

A. Representation of Environmental Intervenors at Prehearing Conference

Please be advised that Ms. Emma H. Bast will speak as the lead attorney for Environmental Intervenors for purposes of the prehearing conference. However, other counsel for Environmental Intervenors will be participating and available during the telephonic prehearing conference as needed.

VII. Settlement

Environmental Intervenors will participate in settlement discussions in this matter.

VIII. Consolidation

Environmental Intervenors support full consolidation of the above-referenced dockets.

IX. Public Input Hearings

Environmental Intervenors support OCA and CAUSE-PA's requests that the Commission schedule and hold public input hearings in sufficient quantity and formats, including both in-

person and telephonic formats, with adequate notice thereof, to encourage consumers and members of the public to attend and participate. Environmental Intervenors support OCA's proposed dates for public input hearings of January 5, 6, 7, and 12, 13, 14, 2027.

Dated: October 30, 2026

Respectfully submitted,

/s/ Emma H. Bast
Emma H. Bast, Esq.
PA. I.D.: 330854
Jessica R. O'Neill, Esq.
PA. I.D.: 205934
Citizens for Pennsylvania's Future
610 North Third St.
Harrisburg PA, 17101
267.838.9154
bast@pennfuture.org
oneill@pennfuture.org
Counsel for EDF, NRDC, and PennFuture

Michael Zimmerman, Esq.
PA. I.D.: 323715
Environmental Defense Fund
257 Park Ave. S.
New York, NY 10010
512.691.3444
mzimmerman@edf.org
Counsel for EDF

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-2026-3065186
Petition of PPL Electric Utilities Corporation for Amendment of Its Default Service Program and Procurement Plan for the Period June 1, 2025, through May 31, 2029	:	Docket No. P-2024-3047290
Pennsylvania Office of Consumer Advocate v. PPL Electric Utilities Corporation	:	Docket No. C-2026-3065756

CERTIFICATE OF SERVICE

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

Service By Email Only

Michael J. Shafer, Esq. PPL Services Corporation 645 Hamilton Street, Suite 700 Allentown, PA 18104 mjshafer@pplweb.com *Counsel for PPL Electric Utilities*	Kimberly A. Klock, Esq. David B. MacGregor, Esq. Post & Schell, P.C. 17 North Second Street 12th Floor Harrisburg, PA 17101-1601 dmacgregor@postschell.com

	Counsel for PPL Electric Utilities
Devin T. Ryan, Esq. Hayley E. Wilburn, Esq. Emily Grecu, Esq. Megan E. Rulli, Esq. Post & Schell, P.C. One Oxford Centre 301 Grant Street, Suite 3010 Pittsburgh, PA 15219 dryan@postschell.com hwilburn@postschell.com hwilburn@postschell.com egrecu@postschell.com *Counsel for PPL Electric Utilities*	Scott B. Granger, Esq. Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 sgranger@pa.gov Steven C. Gray, Esq. Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101 sgray@pa.gov *Counsel for OSBA*
Christopher O'Hara, Esq. Vice President, General Counsel, Law & Chief Compliance Officer PJM Interconnection 2750 Monroe Boulevard Audubon, PA 19403-2497 christopher.ohara@pjm.com *Counsel for PJM*	Melanie Joy El Atieh, Esq. Jacob D. Guthrie, Esq. Katherine Kennedy, Esq. Johnathan M. Longhurst, Esq. Olivia M. Spergel, Esq. Christal M. Zook, Esq. Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923 melatieh@paoca.org jguthrie@paoca.org kkennedy@paoca.org ospergel@paoca.org czook@paoca.org *Counsel for OCA*
Deanne M. O'Dell, Esq. Eckert Seamans Cherin & Mellott, LLC 213 Market Street, 8th Floor Harrisburg, PA 17101 dodell@eckertseamans.com	Elizabeth R Marx, Esq. Ria M. Pereira, Esq. John W. Sweet, Esq. Lauren N. Berman, Esq. Levi A. Phillips, Esq. PA Utility Law Project 118 Locust Street Harrisburg, PA 17101 PULP@pautilitylawproject.org *Counsel for CAUSE-PA*
Judith Cassel, Esq. Micah R. Bucy, Esq. Kathryn C. Read-Fisher, Esq. HMS Legal LLP 501 Corporate Circle Suite 302	Lauren M. Burge, Esq. Eckert Seamans Cherin & Mellott, LLC 600 Grant Street, 44th Floor Pittsburgh, PA 15219 lburge@eckertseamans.com *Counsel for RESA and NRG Energy, Inc.*

Harrisburg, PA 17110 jdcassel@hmslegal.com kcr@hmslegal.com mrbucy@hmslegal.com *Counsel for Regenerative Energy Initiative*	
Clifford B. Levine, Esq. Rebecca E. Kennedy, Esq. Dentons Cohen & Grigsby 624 Liberty Avenue Pittsburgh, PA 15222-3152 clifford.levine@dentons.com rebecca.kennedy@dentons.com *Counsel for Shell Energy North America (US), L.P.*	Adeolu A. Bakare, Esq. McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 abakare@mcneeslaw.com *Counsel for PPLICA*
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*	Todd S. Stewart, Esq. Whitney E. Snyder, Esq. HMS Legal LLP 501 Corporate Circle Suite 302 Harrisburg, PA 17110 tsstewart@hmslegal.com wesnyder@hmslegal.com Brian R. Greene, Esq. *Pro Hac Vice* Simeon A. Brown, Esq. *Pro Hac Vice* Greenehurlocker, PLC 4908 Monument Avenue, 2nd Floor Richmond, VA 23230 BGreene@GreeneHurlocker.com SBrown@GreeneHurlocker.com *Counsel for Amazon Data Services, Inc.*
Pamela C. Polacek, Esq. Chief Legal and Regulatory Officer C&T Enterprises, Inc. P.O. Box 129 Venetia, PA 15367 ppolacek@ctenterprises.org *Counsel to Citizens' Electric Company of Lewisburg, PA*	NazAarah Sabree, Esq. Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101 nsabree@pa.gov *Counsel for OSBA*
Mark Szybist, Esq. Rachel Carson State Office Building 400 Market Street, 16th Floor Harrisburg, PA 17101 mszybist@pa.gov *Special Counsel for Energy Affordability Office of Governor Josh Shapiro*	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*

Jordyn Pace, Esq. 400 Market Street Harrisburg, PA 17101 jorpace@pa.gov *Pa. Governor's Office of General Counsel*	

Date: October 30, 2026

/s/ Emma H. Bast
Emma H. Bast, Esq.
Counsel for Environmental Intervenors