Before the
Pennsylvania Public Utility Commission

Pennsylvania Public Utility Commission :
v. PPL Electric Utilities Corporation : Docket No. R-2025-3057154

November 14, 2025

Interrogatories, Set I
Eric Joseph Epstein, Pro se

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DATE OF DEPOSIT

NOV 14 2025

PA Public Utility Commission
Secretary's Bureau

Dear Mr. Ryan:

Enclosed please find Eric Epstein's Interrogatories, Set I, in the above-referenced proceeding. Copies of these Interrogatories have been e-mailed to all parties identified in the most recent Certificate of Service, and sent via overnight mail to the Public Utility Commission. I hereby certify that this day I served a copy upon persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Sincerely,

Eric Joseph Epstein, Pro se
4100 Hillsdale Road
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Instructions

a) These Interrogatories shall be deemed to be continuing. The Respondent is obliged to change, supplement, and correct all answers to Interrogatories to conform to available information, including such information as first becomes available to the Respondent after the answers hereto are filed;

b) The answers provided should first restate the question asked and identify the person(s) supplying the information;

c) All information is to be divulged that is within the knowledge, possession, control or custody of the Respondent or may be reasonably ascertained thereby. The term "PPL," "the Company," or "PPL Electric Utilities Corporation," as used herein, includes: PPL Electric Utilities Corporation, its attorneys, agents, employees, or other representatives, and predecessor or successor attorneys, agents, employees, or other representatives; and,

d) As used herein the terms "document(s)" or "work paper(s)" include, but are not limited to, the original and all copies (regardless of origin and whether or not including additional writing therein or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium including computerized memory or magnetic media.

Epstein, Interrogatories, Set 1

EE-1. PJM's operating agreement requires utilities to disclose their local transmission plans as part of its FERC-approved planning process (PJM Interconnection, 2025). The PJM's Transmission Expansion Advisory Committee ("TEAC") is where utilities submit transmission assumptions and designs for review and comment before adding locally planned facilities to the Regional Transmission Expansion Plan ("RTEP").

Please provide PPL's submissions to the RTEP and the TEAC for PJM Interconnection, 2025.

EE-2. Utilities can bring specific requests for new customer service at a specific location to TEAC's monthly meetings.

Please provide the install designs for building transmission lines and substations necessary to fulfill individual customers' requests for connection as well as future plans and projections from 2025-2030.

EE-3. Please provide the expected customer demand levels, and the expected year of need for data centers in PPL's rate territory from 2025 to 2035.

EE-4. Please provide the names and locations of new substations, the cost of major project segments, and the tracking number that will appear in PJM's annual RTEP.

EE-5. The causation of these costs and attaching a single customer to the transmission system is not visible.

Please provide PPL's plan to account and publish causation of costs to consumers.

EE-6. Please describe customer demand levels by rate class and the expected year of need identified by PPL from 2025 to 2035.

EE-7. Utilities collect transmission connection costs from data centers, either up front or by direct assignment, but only in 5 percent of cases. In 2024, utilities described six of the 130 transmission connection projects for large loads as having no cost to other customers, and being paid for by the single customer. Utilities assigned $4.3 billion in connection costs for the remaining 95 percent of data center projects to the same pool of costs paid by all consumers." (UCS)

Prepayment from customers for direct connections to the transmission system would lower utilities' rate base and profits (Lazar, 2020).

Please provide PPL's pre-payment proposal to establish rate payer equity.

EE-8. Fair and prudent allocation of power sector infrastructure costs requires regulatory oversight.

Please provide PPL's plan to track costs from data center interconnections and line extensions to the appropriate retail rate class.

EE-9. Costs should be assigned to the specific customer—or an appropriate rate class that is causing the costs—to avoid subsidization by all other customers. Creating a rate class for the largest new customers will not solve this problem unless the costs presently mixed with other transmission costs are separated.

Please provide PPL's proposal to prevent inter-class subsidies.

EE-10. Please provide PPL's plan to align rates for large data customers with the costs of transmission-level connections to the customer or class responsible for those that type of connections.

EE-11. "A joint venture between PPL and Blackstone Infrastructure to develop front-of-the-meter generation that sits atop the Marcellus and Utica shale basins - which can quickly connect to significant, available gas pipeline capacity - and targets areas of significant data center interest. The two entities plan to build, own and operate new gas-fired, combined-cycle generation stations to power data" (PPL)

Please provide the contract and details describing PPL's role as a public utility in partnership with Blackstone.

EE-12. Pennsylvania's electricity deregulation was passed in 1996 through the Electricity Generation Customer Choice and Competition Act ("EGGCA"). PPL is an electric distribution company ("EDC"). EDCs are responsible for infrastructure in their service areas. They maintain the wires, the poles and connections to homes and businesses. EDCs are limited to serves as a Default Service Provider, Alternative Energy Compliance, and energy storge systems as a distribution asset.

Please provide the legal opinion and supporting citations that allows PPL to subvert the EGCCA and partner with private equity firms to generate electricity.

EE-13. Blackstone announced a $25 billion investment in data center and energy infrastructure development in Northeast Pennsylvania along with a new joint venture with PPL Corporation for power generation.

EE-14. Please provide the proposed rate tariff schedules for PPL and Blackstone projects.

EE-15. Please provide the consumer protections to ensure PPL's customers are not underwriting upgrades in other service areas and outside of the Commonwealth of Pennsylvania.

EE-16. Please provide the regulatory regime that will maintain oversight of the public and private venture, i.e., PPL and Blackstone partnership.

EE-17. PPL announced a $6.8 billion infrastructure commitment and natural gas generation projects.

Please provide a detailed explanation of the rate payers role in underwriting this scheme.

Respectfully submitted,

Eric Joseph Epstein
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I hereby certify that a true and correct copy of this filing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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