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March 28, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, 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 a Default Service Program and Procurement Plan for the Period June 1, 2025 through May 31, 2029
Docket No. P-2024-3047290**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of the PP&L Industrial Customer Alliance ("PPLICA"), in the above-referenced proceeding.

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,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', written over a white background.

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

Counsel to the PP&L Industrial Customer Alliance

Attachment

c: Administrative Law Judge F. Joseph Brady (via e-mail)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

VIA E-MAIL

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Adeolu A. Bakare

Counsel to the PP&L Industrial Customer Alliance

Dated this 28th day of March, 2024, at Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
For Approval of a Default Service Program :
and Procurement Plan for the Period June 1, 2025 : Docket No. P-2024-3047290
through May 31, 2029 :

**PETITION TO INTERVENE
OF THE PP&L INDUSTRIAL CUSTOMER ALLIANCE**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71 - 5.74, the PP&L Industrial Customer Alliance ("PPLICA") hereby files this Petition to Intervene in response to the above-captioned filing of PPL Electric Utilities Corporation, Inc. ("PPL" or "Company").

On March 12, 2024, PPL petitioned the Commission for approval of the Company's Phase VI Default Service Program & Procurement Plan ("DSP VI") for the period June 1, 2025, through May 31, 2029. The Company's Petition outlines a number of terms and conditions by which the Company will supply default service to all retail customers within its service territory.

In support of its Petition to Intervene, PPLICA asserts the following:

I. PETITION TO INTERVENE

1. PPLICA is an ad hoc group of energy-intensive large commercial and industrial ("Large C&I") customers receiving electric service from PPL primarily under Rate Schedules LP-4 and LP-5, as well as available riders. PPLICA members annually consume approximately 1.03

billion kWh of electricity in their manufacturing and operational processes, and electricity costs comprise a significant element of their respective costs of operation.

2. PPLICA has been actively involved in many proceedings related to the introduction of electric generation supply choice in PPL's service territory. This includes participating in PPL's Restructuring Proceeding pursuant to the Electricity Generation Customer Choice and Competition Act ("Competition Act") and joining as a signatory to the Settlement that resolved the appeals and challenges to the Commission's Final order in the Restructuring Proceeding at Docket No. R-009739954. PPLICA also consistently participates in PPL's base rate case proceedings and actively participated in the Company's current Default Service Plan at Docket No. P-2020-3019356.

3. The PUC's disposition of PPL's Petition in this instance may impact the rates PPLICA members pay for electric service.

4. The names and address of PPLICA's attorneys are:

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Harrison Ryan Block (Pa. I.D. No. 334653)
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5. For purposes of this proceeding, PPLICA includes the companies listed in Appendix A hereto. PPLICA will update Appendix A during the course of this proceeding as needed to reflect changes in its membership.

6. PPL's Petition generally preserves many programs under its current DSP. However, there is a risk that other intervening parties may propose amendments to the DSP VI that could negatively impact PPLICA members.

7. Therefore, consistent with 52 Pa. Code § 5.72(a), PPLICA has a significant interest in this proceeding that is not represented by any other party of record. Consequently, PPLICA should be granted intervenor status in this proceeding.

WHEREFORE, for the reasons stated above, the PP&L Industrial Customer Alliance respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene and provide the PP&L Industrial Customer Alliance with full-party status in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Counsel to the PP&L Industrial Customer
Alliance

Dated: March 28, 2024

APPENDIX A

PP&L INDUSTRIAL CUSTOMER ALLIANCE

Air Products and Chemicals, Inc.

Benton Foundry

Hercules Cement Company

Hydro Extrusions, Inc.

Messer LLC

TIMET North America

Wegmans Food Markets, Inc.

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)
)
) ss:
COUNTY OF DAUPHIN)

ADEOLU A. BAKARE, being duly sworn according to law, deposes and says that he is Counsel to the PP&L Industrial Customer Alliance, and that in this capacity he is authorized to and does make this affidavit for them, and that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of his knowledge, information, and belief.



Adeolu A. Bakare

March 28, 2024