



Cogentrix Energy Power Management, LLC

June 5, 2025

**Cogentrix Energy Power Management, LLC (Cogentrix) Comments to the
Pennsylvania PUC En Banc Hearing on
Interconnection and Tariffs for Large Load Customers
Docket No. M-2025-3054271**

Cogentrix Energy Power Management, LLC (Cogentrix) is pleased to provide these comments in response to the Pennsylvania Public Utility Commission's (PUC) En Banc Hearing on Interconnection and Tariffs for Large Load Customers held on April 24, 2025.

By way of background, Cogentrix's affiliates own, and Cogentrix and its subsidiaries operate and sell energy and capacity from, approximately 5,000 MW of electric generation facilities throughout the United States, including two natural gas-fired, combined-cycle power plants in Pennsylvania.

The Patriot Liberty Generation Plant is located in Lycoming County with a base capacity of 870 MW. In addition, the Hamilton Liberty Generation Plant is located in Bradford County with a base capacity of 870 MW as well.

Cogentrix supports PUC's proactive approach to bring generators, distribution companies and large load customers together. With the increasing need for resource adequacy across the PJM region, Pennsylvania and other states should adopt policies that encourage generators to expand and build new generation to meet the growing demand.

As a major exporter of energy within PJM, Pennsylvania continues to play a major role in meeting the PJM region's increasing energy demands. Due to the availability of natural gas in Pennsylvania, the Commonwealth is uniquely positioned to support additional development of natural gas-fired power plants.

In response to this growing demand, Cogentrix recently participated in PJM's Reliability Resource Initiative (RRI). Through RRI, Cogentrix is currently in the process of completing upgrades to equipment at its Hamilton Liberty Generation Plant that will increase output approximately 60 megawatts. The Hamilton Patriot Generation Plant will also upgrade equipment in 2026 to increase output by 30 megawatts (the plant also increased output in 2021 by 30 megawatts prior to PJM launching RRI).

As expected, Cogentrix continues to be approached by large load customers including data centers. This presents a unique opportunity for Cogentrix to partner using its existing generating assets or explore potential expansion opportunities.

As discussed by several panelists during the en banc hearing, multiple solutions should be explored to balance the growing demand from large load customers versus everyday residential and business customers of the distribution companies. While generators should be able to reserve the right to sell their power through a variety of mechanisms, Cogentrix also recognizes how private agreements with large load customers could have a significant impact on PJM capacity pricing and everyday customers.

This is a delicate balancing act best met by a mix of in-front of and behind the meter solutions. Yet, generators, distribution companies and large load users are currently awaiting a final decision by the Federal Energy Regulatory Commission (FERC) on co-located loads and similar challenges. Until FERC offers guidance, all parties including the PUC must continue to have an open dialogue.

While we all await FERC's ruling decision, we must also capitalize on partnerships when presented. For now, these partnerships should remain flexible and allow agreements to move forward. This will enable the partnerships to move forward quickly once the ruling is issued.

Again, Cogentrix appreciates PUC's proactive approach and maintaining an open dialogue on interconnections and tariffs for large loads. We appreciate the opportunity to submit these brief comments and look forward to continuing to work with the PUC to address Pennsylvania's energy needs.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph J. Delmar, Sr.", written in a cursive style.

Joseph J. Delmar, Sr.

Director, Governmental Affairs