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June 6, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

**Re: *En Banc* Hearing Concerning Interconnection and Tariffs for
Large Load Customers - Docket No. M-2025-3054271**

Dear Secretary Homsher:

In response to your Secretarial Letter of May 15, 2025, please find attached Pennsylvania-American Water Company's Comments to the above-referenced proceeding.

Should you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Erin K. Fure".

Erin K. Fure

cc: All Parties on the attached Certificate of Service (*via electronic mail*)
James A. Mullins, Assistant Counsel – Law Bureau (*via electronic mail*)
Scott J. Thomas, Assistant Counsel – Law Bureau (*via electronic mail*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

***En Banc* Hearing Concerning Interconnection and Tariffs for Large Load Customers** : : **M-2025-3054271**

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of June served the above-referenced Comments upon the people, via electronic mail, which service satisfies the requirements of 52 Pa. Code §1.54 (relating to service by a party).

SERVED VIA ELECTRONIC MAIL ON JUNE 6, 2025

Darryl A. Lawrence, Consumer Advocate
Office of Consumer Advocate
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(via electronic mail)

NazAarah Sabree, Small Business Advocate
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Alison Kaster, Director
Pennsylvania Public Utility Commission
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400 North Street
PO Box 3265
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Respectfully Submitted,



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Attorney for Pennsylvania-American Water Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

En Banc Hearing Concerning Interconnection and Tariffs :
for Large Load Customers : M-2025-3054271
:

COMMENTS OF PENNSYLVANIA-AMERICAN WATER COMPANY

Pennsylvania-American Water Company (“PAWC” or the “Company”) appreciates the opportunity to offer comments following the *en banc* hearing concerning interconnection and tariffs for large load customers.

I. BACKGROUND

On March 27, 2025, the Pennsylvania Public Utility Commission (“Commission”) approved a Motion by Chairman Stephen M. DeFrank to, *inter alia*, convene an *en banc* hearing to address questions regarding the interconnection of data centers. On April 12, 2025, the Commission issued a Secretarial Letter scheduling the *en banc* hearing for April 24, 2025 and setting forth deadlines for the submission of comments and reply comments. The *en banc* hearing was held on April 24, 2025, at which time numerous stakeholders presented testimony in response to the questions raised in the March 27, 2025 Motion. On May 1, 2025, Vice Chair Kimberly Barrow issued Directed Questions, which stakeholders are encouraged to consider when submitting comments in response to the *en banc* hearing. On May 12, 2025, the Energy Association of Pennsylvania (EAP) filed a letter requesting an extension to the comment and reply comment deadlines. By Secretarial Letter dated May 15, 2025, the deadlines for the filing of comments and reply comments were extended to June 6, 2025 and June 23, 2025, respectively.

II. INTRODUCTION AND GENERAL COMMENTS

PAWC commends the Commission for attempting to balance the interests of the various stakeholders who are impacted by large load customers and to develop a proposed model tariff for large load customers to be used by electric distribution companies. PAWC, as a water and wastewater utility, is differently situated from utilities providing electric service and therefore does not share some of the concerns raised in the testimony provided during the *en banc* hearing. Nevertheless, PAWC wishes to submit comments responsive to the acknowledged benefit that large load customers bring opportunities to the Commonwealth in terms of job creation and economic growth.

III. COMMENTS IN RESPONSE TO THE *EN BANC* HEARING

At the April 24, 2025 *en banc* hearing, testimony was provided by The Data Center Coalition that:

[T]he data-center sector is a major economic force. In 2023, it supported 4.7 million jobs, including 603,900 direct jobs—up 51% since 2017. These roles generated 404 billion in wages, a 93% jump over the same period. Direct contributions added 231 billion to GDP. Total annual contributions to U.S. GDP in 2023, including direct, indirect, and induced effects totaled 727 billion. Each data-center job now underpins more than six additional jobs across the economy. The industry also delivered 162.7 billion in federal, state, and local tax revenue in 2023, 146% above 2017, highlighting its growing fiscal value.¹

Amazon Data Services, Inc., noted in its testimony that speed to market continues to be a priority.²

PAWC encourages the Commission to take this opportunity to establish firm timeframes around requests for extensions of service territory. Providing more certainty around the timing of the approval process will enable utilities and potential customers to more accurately plan, budget,

¹ Testimony of Lucas Fykes on behalf of the Data Center Coalition, p. 2.

² Opening Statement of Michael Fradette on behalf of Amazon Data Services, Inc., p.5.

and coordinate projects. This in turn will make the Commonwealth more attractive for development because it builds in predictability.

Additionally, given the benefits that certain economic development projects, such as data centers, bring to the Commonwealth, PAWC encourages the Commission to create an expedited process to be used when a request for service territory expansion is made to serve high-impact development and infrastructure projects. The need to facilitate these types of projects has been acknowledged in other areas. For example, Executive Order 2024-04 established the PA Permit Fast Track Program which is designed to enhance coordination and predictability to Pennsylvania's authorization process for critical infrastructure projects and projects delivering significant economic development to the Commonwealth. The goals of the PA Permit Fast Track Program are to enhance Pennsylvania's competitiveness, increase economic opportunity, and position Pennsylvania as an economic leader nationally and globally. Similar goals can be achieved by enhancing the time frames around approvals for extensions of service territory applications. PAWC offers for consideration a ninety-day time period from filing of the application to approval. An expedited process for these unique projects will enhance Pennsylvania's competitiveness to attract economic growth opportunities.

IV. CONCLUSION

PAWC thanks the Commission for this opportunity to comment following the *en banc* hearing concerning interconnection and tariffs for large load customers and for considering the comments contained herein.

Respectfully submitted,



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