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June 6, 2025

Pennsylvania Public Utility Commission
400 North Street Commonwealth Keystone Building, 2nd Floor
Harrisburg, Pennsylvania 17120

Re: Docket No. M-2025-3054271 Comments of Mainspring Energy, Inc. on Interconnection and Tariffs for Large Load Customers

Dear Secretary,

Mainspring Energy, Inc. ("Mainspring") appreciates the opportunity to submit comments following the Commission's en banc hearing on interconnection and tariffs for large load customers. Mainspring supports the Commission's proactive approach to addressing the unique challenges and opportunities presented by large-scale electric customers, particularly data centers.

Mainspring, a provider of dispatchable, fuel-flexible, generation technology, is actively engaged in developing co-located and behind-the-meter (BTM) projects in PJM. Our Linear Generator technology offers significant benefits to large load customers, the grid, and ratepayers through rapid deployment, operational flexibility, emissions reductions, and fuel versatility.

We offer the following recommendations, based on our experience:

1. **Enable on-site bridge power:** AlphaStruxure's recent April 2025 poll of data center leaders found that the largest obstacle is grid power availability - 92% of project delays are from grid power (slide 18).[1] Further, nationally, 44% of the time, grid power delays are 4 years or more (slide 10). As a result, 76% of respondents indicate they have already invested or are planning to invest in on-site power generation as primary power (slide 25). The Commission should

[1] https://alphastruxure.com/wp-content/uploads/2025/04/Surveying-the-Data-Center-Industry.pdf

conduct a broader review of speed to power in Pennsylvania and the barriers and solutions needed for large loads to bring on-site power to serve their full load until the grid arrives.

2. **New Tariff Structures**: Recent analyses such as Duke University's *Rethinking Load Growth*, quantify the enormous benefits from encouraging large loads to become more flexible[2]. Mainspring recommends the Commission clearly delineate retail tariff classes between traditional firm services and non-firm, interruptible services. Mainspring supports non-capacity backed service models where loads can self-supply or curtail, in the spirit of PJM's proposed frameworks currently under exploration at FERC and in the PJM stakeholder process.[3] [4]

   Wholesale reforms require companion retail reforms and the Commission should conduct an additional En Banc to gather expert input on such approaches.

3. **Flexible On-Site Generation Integration**: Allow large load customers with on-site generation flexibility in integrating this capacity, particularly as BTM generation (BTMG). We recommend PJM maintain distinct tariff classes for retail and non-retail BTMG and propose introducing a new class specifically for repurposed legacy generation, as detailed in recent FERC deliberations.
4. **Transparent and Expedited Interconnection**: Establish clear, expedited interconnection pathways for customers willing to undertake and finance necessary infrastructure upgrades. Clearly defined tariff language detailing required interconnection studies, costs, and processes is essential to facilitate timely and transparent interconnections.
5. **Cost and Fee Transparency**: Explicitly detail the cost allocation procedures and study expenses for load interconnections, including those bringing their own generation capacity to serve a portion of their own load.
6. **Enhanced Load Forecasting and Planning**: Require utilities to proactively gather data from customers employing co-located generation to enhance forecasting accuracy. Accurate forecasting is critical in accommodating load growth without compromising reliability or increasing costs for other ratepayers.

In summary, these recommendations will support Pennsylvania in efficiently managing the growth of large-scale electric loads while safeguarding grid reliability and protecting ratepayer interests. Mainspring remains committed to collaborating with the

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[2] https://nicholasinstitute.duke.edu/articles/three-key-takeaways-rethinking-load-growth-us-power-systems

[3] PJM Interconnection, L.L.C., et al., 190 FERC 61,115 (2025)

[4] PJM Large Load Workshop, May 9, 2025 https://www.pjm.com/-/media/DotCom/committees-groups/workshops/llaw/2025/20250509/20250509-item-02---large-load-additions-workshop---presentation.pdf

Commission, utilities, and stakeholders to implement innovative, resilient, and cost-effective solutions.

Thank you for considering these recommendations. We look forward to ongoing collaboration.

Respectfully submitted,

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