

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

EN BANC HEARING CONCERNING : M-2025-3054271
INTERCONNECTION AND TARIFFS FOR LARGE :
LOAD CUSTOMERS

REPLY COMMENTS OF TALEN ENERGY CORPORATION

AND NOW COMES Talen Energy Corporation (“Talen”), in response to the Pennsylvania Public Utility Commission’s (“Commission”) April 24, 2025 en banc hearing concerning interconnection and tariffs for large load customers and the Secretarial Letters in this matter dated April 12, 2025 and May 15, 2025, to file these comments with the Commission.

Talen is a leading independent power producer and energy infrastructure company that owns and operates nearly 11 gigawatts of power infrastructure in the United States, including 2.2 gigawatts of nuclear power and a significant dispatchable fossil fleet. Talen produces and sells electricity, capacity, and ancillary services into wholesale U.S. power markets, including and primarily in the PJM Interconnection Regional Transmission Organization (“PJM”). Talen owns 8,097 megawatts of installed generating capacity in the Commonwealth of Pennsylvania, making it the largest generation owner on an installed-capacity basis. Formed in 2015, Talen boasts a diverse fuel generation portfolio, comprised of approximately 47% natural gas, 25% coal, and 28% nuclear. Talen employs 1,347 workers in the Commonwealth; 46.6% of these employees are members of respective labor unions.

Talen’s generation portfolio is anchored by an approximately 2.2 gigawatt interest in the Susquehanna nuclear facility, which enabled the company to produce over half of its generation carbon-free in 2023. Talen also recently completed a natural gas fuel conversion of its 1,528

megawatt Montour plant, located in Washingtonville, Pennsylvania. The company's Pennsylvania portfolio and investments within the Commonwealth since its formation in 2015 demonstrate a commitment that integrates carbon-free generation with a responsible transition, which prioritizes maintaining a reliable and affordable power system. Talen is responding to current market signals to address resource adequacy. Talen supports an all-of-the-above approach to resource adequacy and ensuring a grid that supports developing technologies and emerging industries. This includes allowing the free market to best control prices and incentivize investment in new generation.

Talen has reviewed and supports certain key portions of the Comments of Constellation Energy Generation, LLC ("Constellation") dated June 6, 2025 ("Constellation Comments"), submitted to the Commission in this matter. Specifically, Talen agrees with Sections C, D, and E of the Constellation Comments, pages 9-14. At the outset, Talen joins Constellation in supporting a model large load interconnection tariff and agrees that this model tariff should focus on ensuring fair policies that enable reliable power sources for large load customers while mitigating risks and adverse impacts to existing customers. Talen agrees that the Commission should protect Pennsylvania customers and reject calls for reform that would undermine the competitive wholesale markets. Talen maintains that the PJM capacity market is still the best method to incent new generation, and suggestions to reform or overhaul the competitive wholesale markets or to allow electric distribution companies to develop generation to manage anticipated load growth would have significant customer costs and risk implications. Pennsylvania ratepayers will be better protected by maintaining the existing competitive wholesale markets. Talen also agrees that the Commission should resist calls to require large load customers to bring their own new generation. Such a requirement would be unduly discriminatory and could worsen existing resource adequacy concerns. Existing generation and co-located load arrangements are part of the

all-of-the-above approach to resource adequacy that will ensure reliable service for large load customers, while making efficient use of existing resources. Finally, Talen agrees that the Commission should not allow resource adequacy concerns driven primarily by potentially overstated load growth projections to cause it to adopt policies that will harm Pennsylvania in the long run. The Commission should generally avoid regulatory complexity and instead should embrace pro-economic policies that will serve to attract large load customers to the benefit of the Commonwealth's economy.

Talen is committed to Pennsylvania and the Commonwealth is where most of its assets are located. Pennsylvania is well positioned to serve these large load customers, while mitigating risk and recognizing fairness to existing customers. With access to natural gas and supportive infrastructure, Pennsylvania is the anchor for PJM and could realize property tax and job benefits from industrialization, data centers, and emerging technological industries. Talen expects that the competitive market, left undisturbed, should incentivize new generation on its own as necessary, and Talen looks forward to being a part of the solution in Pennsylvania to address resource adequacy and to support new large load customers.

Talen thanks the Commission for the opportunity to submit these comments and Talen commends the Commission for convening the en banc hearing to discuss critical issues with respect to interconnection and tariffs for large load customers. Talen looks forward to working with the Commission and other stakeholders to address the issues raised in connection with the en banc hearing and generally to ensure reliable and cost-effective power in the Commonwealth.

Respectfully submitted,



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Date: June 23, 2025