



CENTER FOR COALFIELD JUSTICE

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November 24th, 2025

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, Second Floor
400 North Street, Harrisburg, PA 17120

**RE: Pennsylvania Public Utility Commission Model Tariff for Large Load Customers
Docket No. M-2025-3054271**

Thank you for the opportunity to provide input on Docket No.M-2025-3054271. The Center for Coalfield Justice (“CCJ”) respectfully submits the following comments.

CCJ is a Pennsylvania-incorporated not-for-profit organization with federal Internal Revenue Service § 501(c)(3)-status recognition located in Washington, PA. Our mission is to “improve policy and regulations for the oversight of fossil fuel extraction and use; to educate, empower and organize coalfield citizens; and to protect public and environmental health.” CCJ has over three thousand members and supporters and is governed by a volunteer Board of Directors.

As an organization committed to equitable, environmentally sound energy policy, we strongly urge the Commission to ensure that residential and small-business customers are not forced to subsidize the infrastructure required by energy-intensive commercial operations.

CCJ offers the following comments.

1. Ratepayers Are Already Experiencing Higher Electricity Costs—They Cannot Afford to Underwrite Large Load Development

Across the Commonwealth, many ratepayers have seen increases in their electricity bills since early summer. During public meetings, community forums, and conversations with local officials, residents have repeatedly expressed concern that rising distribution and supply charges are coinciding with a surge in grid-intensive development, especially data centers and other large load facilities.

While a variety of factors influence energy prices, it is clear that the current growth of considerable, rapid-deployment loads is already placing stress on the grid and contributing to the need for accelerated utility investment. Ratepayers are understandably concerned that they will be asked to bear even more costs as utilities invest in new substations, feeders, and reliability upgrades to serve private, high-demand customers. This docket is a crucial opportunity for the Commission to prevent that outcome.

2. The Model Tariff Must Make Clear That Large Load Customers Pay for the Infrastructure They Require

The Commission must adopt tariff provisions that unequivocally ensure:

- Large load customers, not ordinary households, pay 100% of the costs of new infrastructure built to serve them;
- Utilities cannot shift project-specific capital expenditures into general rate base.
- Mandatory system impact studies fully identify required upgrades before service commitments are made.
- Cost-causation principles are binding, enforceable, and uniform across the Commonwealth.

Without these protections, ratepayers who are already facing increased cost pressures may experience further bill escalations as private facilities trigger grid investments that far exceed local community needs.

3. Large Load Customers Must Demonstrate Responsible Energy Behavior

To reduce strain on the grid and avoid future cost escalation, the model tariff should require or incentivize large load customers to:

- Implement energy efficiency and demand-flexibility measures;
- Adopt on-site generation or storage where appropriate.
- Source renewable or low-carbon energy;
- Provide transparent reporting on load profiles, energy procurement, and system impacts.

These are the minimal expectations for customers whose consumption scale can significantly impact both grid operations and electricity prices.

4. Protecting Reliability for Current Customers

The Commission should require utilities to certify that any new large load will not diminish grid reliability for existing customers and will not necessitate upgrades that are shifted into the general rate base. Will proceed only after the benefiting customer commits to paying for all infrastructure attributable to its demand. Reliability risks and rising costs must not fall on households already grappling with higher bills.

5. Ongoing Oversight Under This Docket Is Essential

Given the rapid pace of large-load growth, we strongly recommend that the Commission require a periodic review of the model tariff. As well as annual utility reporting on large-load-driven projects, cost recovery, and Corrective mechanisms to address any future cost shifting.

Conclusion

The concerns voiced by Pennsylvania ratepayers this year make clear that now is the time to draw a firm line: the costs of serving large load customers must be paid by those customers—not by families, seniors, or small businesses already facing rising electricity bills. The Commission’s work in Docket No. M-2025-3054271 is essential to ensuring a fair, reliable, and environmentally responsible energy future for the Commonwealth.

Thank you for your consideration. If you have any questions, please contact me anytime.

Respectfully,

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Community Advocate

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