

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

RE: Docket No. M-2025-3054271

Interconnection and Tariffs for Large Load Customers

Comments of Dollar Energy Fund to the Pennsylvania Public Utility Commission

Introduction

The Pennsylvania Public Utility Commission (“PA PUC”) issued a Tentative Order on November 6, 2025, addressing the responsibilities of large load customers—particularly data centers—in contributing to utility hardship funds and system reliability. This proceeding recognizes that these large consumers significantly influence infrastructure costs and ratepayer affordability. Dollar Energy Fund appreciates the opportunity to provide these comments in support of a fair, transparent, and sustainable framework that promotes reliability, affordability, and consumer protection for all Pennsylvanians.

About Dollar Energy Fund

Headquartered in Pittsburgh, Dollar Energy Fund is the largest utility-related hardship program in Pennsylvania and the largest private administrator of utility assistance programs in the United States. Since 1983, more than one million low- and limited-income households have benefited from \$347 million in utility assistance grants. The Fund partners with 20 Pennsylvania utilities and 54 utilities across 18 states.

Comments

Support for Vulnerable Populations

Dollar Energy Fund strongly supports the Tentative Order’s intent, which aligns with its mission to assist low-income households facing energy and water insecurity. Requiring large load generators to contribute to hardship funds expands support for families struggling with essential utility costs and reduces the burden on existing ratepayers.

Promoting Fairness

A commitment from large load generators promotes systemic fairness. As electricity powers water treatment and distribution systems, increased demand leads to higher operating costs borne by residential users. Ensuring that large energy consumers contribute to hardship funds helps balance financial responsibility and preserves affordability for all customers.

Impact and Equity

The rapid growth of data centers and other energy-intensive facilities continues to affect household bills. Large-scale users drive up infrastructure and capacity costs that ultimately impact all ratepayers. Dollar Energy Fund supports tariff structures that mitigate these costs and sustain reliable, affordable service for low- and moderate-income customers.

Support for Moderate-Income Customers

The Fund remains committed to assisting moderate-income households—those earning up to 250 percent of the Federal Poverty Income Guidelines (FPIG)—who may not qualify for traditional aid but still face high utility costs. Expanding funding ensures continued access to essential services across this underserved population.

Collaboration and Transparency

Dollar Energy Fund encourages ongoing collaboration between utilities, large load customers, and the Commission to develop transparent reporting and funding mechanisms. Such approaches foster accountability and help ensure ratepayers benefit from large-load system investments rather than absorbing additional costs.

Commissioners' Perspectives

Dollar Energy Fund appreciates the Commissioners' engagement and acknowledges several key themes from their public statements, which underscore support for universal service and funding reform:

- Chairman Stephen M. DeFrank highlighted that Pennsylvania must interconnect large loads efficiently while protecting existing ratepayers, a principle that strongly supports enhancing Hardship Programs.
- Vice Chair Kimberly Barrow urged modernization of universal service funding so that large-load customers—who benefit from system growth—share in supporting energy affordability and customer assistance programs.
- Commissioner Kathryn L. Zerfuss emphasized that tariff implementation must remain equitable and transparent across utilities, ensuring that policy uniformity does not create regional inequities. She stressed that as the Commission develops new cost-allocation rules, funding stability for Hardship Programs and universal service initiatives should remain a priority. She also supported expanded reporting on large-load impacts to guide affordability decisions.
- Commissioner John F. Coleman, Jr. underscored the need for durable and legally-sound rulemaking processes to support any long-term tariff design that allocates funding for Hardship Programs.

Together, these Commissioners' viewpoints affirm a shared commitment to affordability, equity, and customer protection as core objectives of this proceeding.

Recommendation: Hardship Program Funding Mechanism

Dollar Energy Fund strongly recommends that the Commission's final Order explicitly support the development or adoption of funding mechanisms through which large load customers could voluntarily or be compelled to directly contribute to Hardship Programs. Such contributions could be structured as supplemental tariff-based charges proportionate to energy impact, or as voluntary payments dedicated to Hardship Funds. This approach

would align with Commissioners Barrow and Zerfuss’s statements, ensuring system beneficiaries bear fair responsibility while strengthening affordable service for vulnerable households.

Conclusion

Dollar Energy Fund commends the Commission for addressing the relationship between economic growth, grid reliability, and energy affordability. We respectfully urge the Commission to incorporate in its final Order a structure—whether through tariff surcharges, voluntary partnerships, or data-driven industry contributions—that expands Hardship Program resources. Such measures would advance the Commission’s statutory duty to provide safe, equitable, and reliable service for all Pennsylvanians.

References: Pennsylvania Public Utility Commission Tentative Order and Commissioners’ Statements, Docket No. M-2025-3054271 (November 6, 2025).

Respectfully submitted,

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