

Thank you for the opportunity to provide input on Docket No.M-2025-3054271. The Commission's attention to the growing concern of data centers impact on the Commonwealth's people, economy, and environment is essential to ensuring that these facilities do not unduly externalize the cost of artificial intelligence (AI) to Pennsylvanians and the natural resources on which we, and our economy, rely.

To ensure energy is affordable and reliable for all Pennsylvanians, the Commission must adopt all measures recommended by the Pennsylvania Office of Consumer Advocate in their June 6, 2025 comment letter, Comments Concerning Interconnection and Tariffs for Large Load Customers. Specifically, improvements to the Model Tariff must include lowering the draft Model Tariffs definition of a Large Load Customer to 25 megawatts (MW) for EDCs whose peak load is equal to or above 2,500 MW and 1 MW for those utilities whose peak load is less than 2,500 MW. If the sum of multiple facilities at different interconnection points owned by the same parent company exceeds 25 MW, those facilities, even if individually less than the applicable 25 MW or 1 MW threshold, should be defined as a Large Load Customer.

The Commission must adopt provisions that ensure:

1. Large load customers, not ordinary households, pay 100% of the costs of new infrastructure built to serve them.
2. Utilities cannot shift project-specific capital expenditures into a general rate base.
3. Mandatory system impact studies fully identify required upgrades before service commitments are made.
4. Cost-causation principles are binding, enforceable, and uniform across the Commonwealth.
5. Consistent with policy in other jurisdictions, Large Load contracts should be put in place for a duration of no less than 20 years, and only allows for the termination of the contract if the facility ceases operations and pays a financial penalty. Twenty years is necessary to have sufficient time to recover a substantial portion of the distribution costs incurred by the utility.
6. Large Load Customers pay a minimum demand charge of 90% of their MW size.
7. Large Load Customers provide sufficient, high-quality financial guarantees to cover the minimum monthly payments for a minimum of the next two years or the remaining time in the Large Load Customers contract.

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 and will receive little to none of the benefits. 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.