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December 22, 2025

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

VIA E-FILING

RE: Interconnection and Tariffs for Large Load Customers; Docket No. M-2025-3054271

Dear Secretary Homsher:

Enclosed for filing with the Commission are the Comments of Citizens' Electric Company of Lewisburg, PA and Wellsboro Electric Company to the November 2 Tentative Order in the above-referenced matter.

This filing has been served via email on the parties listed on the attached Certificate of Service. If you have any questions regarding this filing, please feel free to contact the undersigned. Thank you.

Very truly yours,

Pamela C. Polacek

By

Pamela C. Polacek

Counsel to Citizens' Electric Company of Lewisburg, PA and
Wellsboro Electric Company

Enclosure

c: Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

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Pamela C. Polacek

Pamela C. Polacek (PA ID No. 78276)

Dated this 22nd day of December, 2025, in Venetia, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Interconnection and Tariffs for Large
Load Customers

: Docket No. M-2025-3054271

**COMMENTS OF CITIZENS' ELECTRIC COMPANY OF LEWISBURG, PA
AND WELLSBORO ELECTRIC COMPANY TO
NOVEMBER 2 TENTATIVE ORDER**

I. INTRODUCTION

On November 2, 2025, the Pennsylvania Public Utility Commission (“PUC” or “Commission”) issued a Tentative Order and an accompanying Appendix – Model Tariff for Customers at or Over 50 MW Individually or 100 MW in the Aggregate outlining its guidelines for a model large load tariff.¹ Interested parties are invited to provide comment within thirty (30) days of its publication in the *Pennsylvania Bulletin*, i.e., by December 22, 2025. Citizens’ Electric Company of Lewisburg, PA (“Citizens”) and Wellsboro Electric Company (“Wellsboro”) hereby provide these limited Comments. Citizens’ and Wellsboro also support the Comments submitted by the Energy Association of Pennsylvania (“EAP”).

II. COMMENTS

The Commission’s primary focus in this proceeding is on very large loads that most likely would not choose to be served by smaller utilities like Citizens’ and Wellsboro; however, the principles upon which the Commission relies could apply equally to substantial loads under the 50 MW threshold that locate in the Citizens’ or Wellsboro territory. Citizens’ and Wellsboro will focus

¹ *Interconnection and Tariffs for Large Load Customers*, Tentative Order entered November 6, 2025, Docket No. M-2025-3054271.

the terms, conditions and impacts of substantial loads requesting interconnection in smaller territories.

A. Contributions in Aid of Construction (“CIAC”)

Citizens’ and Wellsboro agree that Large Load Customers may need to pay CIAC for facilities and upgrades that are constructed solely to serve the customer’s site. To fulfill the Commission’s objective of ensuring that the Large Load Customers are not subsidized by existing customers, Citizens’ and Wellsboro may evaluate tariff changes to ensure that the income taxes associated with CIAC payments are appropriately addressed. Citizens’ and Wellsboro may do this as a change to the general CIAC rules in their tariffs, or as part of any Large Load Customer tariff. The change, of course, would be submitted pursuant to the normal tariff change processes.

Citizens’ and Wellsboro oppose the Commission’s suggestion that Large Load Customers could provide voluntary CIAC contributions to move projects up in the construction queue or expedite interconnection timelines.² Citizens’ and Wellsboro will use prudent efforts to provide service to all interconnecting entities as soon as commercially reasonable. Citizens’ and Wellsboro oppose creating an expedited pathway for customers with the financial wherewithal to provide extra CIAC. Expediting some projects may delay the completion of other projects that were submitted earlier.

B. Interconnection Studies Timelines and Penalties

EAP’s Comments discuss at length the proposed interconnection timelines and refunds of study costs to the Large Load Customer if the utility fails to meet certain deadlines. Citizens’ and Wellsboro support the EAP’s Comments. The imposition of arbitrary timelines could be especially unreasonable for smaller, transmission-dependent utilities. Although a portion of any

² Tentative Order, p. 16.

interconnection request will be studied by the Citizens' or Wellsboro operations employees (likely with the assistance of outside consultants), Citizens' and Wellsboro do not own transmission facilities that may also need to be studied. Citizens' and Wellsboro cannot dictate study or construction timelines to PJM and the transmission owners. In this situation, it is not appropriate to hold Citizens' or Wellsboro accountable to the timeline.

Further, expecting EDCs to return a portion of the study fees is not appropriate. The EDC has an obligation to process interconnection requests and to undertake reasonable actions to ensure that the interconnection does not unreasonably interfere with service to existing customers. Costs incurred by the EDC to do this are prudent costs of providing utility service. As previously stated, Citizens' and Wellsboro most likely would pay outside consultants to assist with the analysis. As EAP's Comments explain, penalizing the EDC by requiring a refund to the Large Load Customer and then denying recovery of the costs from ratepayers is not appropriate.

C. Interruptible Service and Standby Rates for Large Load Customers

EAP's Comments discuss the Commission's proposal for EDCs to offer interruptible service and standby rates to Large Load Customers. Smaller utilities are not in the position to administer interruptible distribution or default service options. Any such service options should be voluntary and reviewed on a case-by-case basis.

D. Infrastructure Upgrades by Large Load Customers

Citizens' and Wellsboro support the EAP's Comments in opposition to the ability of Large Load Customers to do their own infrastructure upgrades to utility systems. Citizens' and Wellsboro's linemen and other operational crews draw important knowledge of the service territory and system through installation of all equipment. Allowing third-party construction may diminish the uniformity and system knowledge.

E. Default Service Implications of Large Load Customers.

The Model Tariff defines “Contract Capacity” as “the mutually agreed amount of monthly peak load requirements for each month . . . whereby the Company agrees to provide all of the components of retail electric service subject to the terms and conditions in its tariffs . . .” If the Large Load Customer purchases default service, then adjustments may be needed to the default service rate classifications to ensure that the Large Load Customer pays its fully-allocated supply costs, including any additional administrative or credit costs that the default service provider may incur. In such situations, Citizens’ and/or Wellsboro may seek to amend their current Generation Supply Service Rate (“GSSR”) default service mechanisms concurrent with the submission of the new Large Load Customer tariff.

III. CONCLUSION

Citizens’ and Wellsboro appreciate the opportunity to provide input to the Commission on this important topic. The principles set forth in the final Model Tariff will be very helpful if Citizens’ and/or Wellsboro are approached in the future by larger projects.

Respectfully submitted,

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By _____

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