

Public Comment on Docket No. M-2025-3054271

Pennsylvania Public Utility Commission

Dear Commissioners,

I am writing to express my deep concern regarding Docket No. M-2025-3054271 and the proposed Model Tariff for Large Load Customers. As a Pennsylvania resident and electricity customer, I am alarmed by policies that risk shifting the financial burden of transmission infrastructure onto households and small businesses, especially to accommodate hyperscale data centers operated by Big Tech companies. These facilities consume massive amounts of energy, yet the costs of expanding and reinforcing the grid are being passed down to everyday Pennsylvanians. This is neither fair nor sustainable.

Key Issues and Recommendations

- **Thresholds for Large Load Customers:**

The Commission's Tentative Order applies the Model Tariff only to customers at or above 50 megawatts, ignoring evidence that smaller loads (as low as 5–20 MW) can also strain infrastructure. I urge the Commission to adopt lower, more realistic thresholds and anti-circumvention rules, as proposed in the Pennsylvania Ratepayer Protection Act (Senate Bill 1114), to better protect reliability and planning.

- **Cost Allocation:**

Large load interconnections often require substantial upgrades. The current framework allows Electric Distribution Companies (EDCs) too much discretion, risking cost-shifting to residential and small business customers. Costs associated with serving large-load customers should be directly assigned to those customers, with transparent calculations and enforceable financial protections.

- **Contract Terms:**

The proposed five-year minimum contract term is insufficient. Contracts should match the lifespan of infrastructure investments. Senate Bill 1114 requires a minimum contract term of twenty years, with clear renewal and payment obligations, ensuring ratepayers are not left subsidizing large corporate users.

- **Community Impacts and Transparency:**

Large load growth affects water use, land development, and local infrastructure. The Commission's current approach lacks robust transparency and reporting.

Stronger annual reporting, consistent tariff provisions, and disclosure requirements are needed to ensure public oversight.

- **Regulatory Guardrails:**

The Tentative Order identifies tools to mitigate risks but treats them as optional. Uniform, mandatory protections—such as long-term contracts, collateral, exit fees, and emergency curtailment rules—are essential for equity and reliability.

Conclusion and Request

Residential customers and small businesses should not be forced to subsidize the energy demands of AI-driven data centers that offer little direct benefit to our communities. The decisions made in this docket will directly affect our electric bills, grid reliability, and the economic resilience of our neighborhoods. I urge the Commission to reject any framework that allows cost-shifting from large corporate users to ordinary ratepayers. Please prioritize transparency, affordability, and equity in grid planning and cost allocation. Pennsylvania's energy future must serve its people—not just the profit margins of multinational tech firms.

Thank you for considering this comment. I respectfully request that my concerns be entered into the public record.

Thank you

Douglas N. Elliott