

Thank you for the opportunity to comment on Docket No.M-2025-3054271.

In my capacity as a director and founder of Energy Efficiency Empowerment, I devote a lot of time trying to lower energy costs for low and middle class residents in SW Pennsylvania. While we do our utmost to improve energy efficiency of homes, there are economic and global forces that continue to put upward pressure on utility rates, resulting in hardships and further impoverishment of lower income folks. And unlike those served by Customer Assistance Programs, folks in between the 150% Federal Poverty Guideline and below 80% Area Median Income levels are particularly impacted.

Given that the need for additional generating capacity stems from the proposed large data center use of electricity, it appears straightforward to require that the companies developing these data centers carry the costs of such additions. While it is not normally possible to associate increased demand with specific customers, this particular scenario is different and therefore offers an opportunity to allocate the increased costs differently. Specifically, I ask that the Commission:

1. Lowers 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.
2. Require that these private facilities pay for grid investment and generation capacity necessary to put them in operation and prevent utilities from shifting project-specific capital expenditures into the general rate base.
3. Require that large load customers must be required to adhere to the strongest possible standards of energy efficiency, demand-flexibility and demonstrate responsible energy planning and use. Additionally, source non-polluting energy, including integrating clean on-site generation or storage where technically feasible.

Thank you,
Lucyna de Barbaro

