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Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Second Floor
400 North Street
Harrisburg, PA 17120

Re: Formal Comments – Tentative Order
Establishing Model Tariff for Large Load /
High-Density Electric Customers (Docket
TBD)

Dear Commissioners,

I respectfully submit these comments urging the Commission to revise the Tentative Order establishing a Model Tariff for Large Load and High-Density Electric Customers to require mandatory statewide application, rather than remain optional at utility discretion. An optional model tariff cannot satisfy statutory obligations under Pennsylvania law requiring just, reasonable, nondiscriminatory rates, and will enable cost-shifting to residential ratepayers.

I. Optional adoption allows discriminatory pricing and violates cost-causation principles

If tariff provisions remain voluntary, utilities—including PPL Electric Utilities, PP&L, UGI Utilities/UGI Electric, and FirstEnergy/Met-Ed—may selectively apply tariff requirements based on business

incentives. This undermines fundamental ratemaking principles in Title 66:

66 Pa.C.S. § 1301 – rates must be just and reasonable

66 Pa.C.S. § 1304 – prohibits unreasonable preferences and discrimination

66 Pa.C.S. § 1501 – requires safe, adequate, reasonable service

Pennsylvania appellate courts have repeatedly affirmed cost causation as central to lawful rate allocation, including: Lloyd v. Pa. PUC, 904 A.2d 1010 (Pa. 2006) Popowsky v. PUC, 869 A.2d 1144 (Pa. Cmwlt. 2005)

City of Pittsburgh v. PUC, 43 A.3d 1000 (Pa. 2012)*

A voluntary tariff invites discriminatory pricing, waivers of collateral or minimum terms, preferential treatment in interconnection, and shifting of grid

reinforcement costs to captive residential customers.

II. Regional transmission impacts require mandatory safeguards

The proliferation of proposed data centers and large-load industrial uses creates unprecedented energy demand concentration across interconnected transmission corridors serving the following municipalities and governing bodies:

Luzerne County

Hazle Township

Butler Township

Sugarloaf Township

Sugarloaf Borough

Black Creek Township

Nescopeck Township

Nescopeck Borough

Salem Township

Foster Township

Dennison Township

Freeland Borough

Carbon County

Nesquehoning Borough

Packer Township

Banks Township

Penn Forest Township

Schuylkill County

Kline Township

Frackville Borough

County Planning Commissions:

Luzerne County Planning Commission

Carbon County Planning Commission

Schuylkill County Planning Commission

These municipalities lie within shared high-

voltage transmission, redundancy, and

substation expansion corridors serving:

Humboldt / Humboldt North / Humboldt

South Industrial Parks

Valmont Industrial Park

CAN DO/CAN DO North industrial zones
NorthPoint/NP Hazleton Holdings sites
Mericle Crossroads industrial development
Tomhicken Substation expansion area
AWS/Amazon “Project Anvil” development
cluster

Industrial-class interconnection requests
exceeding 25–300 MW create system
impacts far exceeding household
consumption and require enforceable cost-
allocation protections.

III. MW economic impact analysis
warrants mandatory cost responsibility
Residential customers must not subsidize
infrastructure upgrades or reliability risks
attributable to large-load customers.

Estimated system reinforcement costs for
high-density load interconnection include:

Estimated Transmission/Substation

Upgrade Costs by Peak MW Load

Recommended Assistance Contribution

Approx. Homes Equivalent

Est. Upgrade/MW Cost

Estimated Total Upgrade Cost

Customer Load

25 MW

~18,750 homes

\$1.5–\$4M

\$37.5M–\$100M

\$125k–\$250k/yr

50 MW

~37,500 homes

\$1.5–\$4M

\$75M–\$200M

\$250k–\$500k/yr

100 MW

~75,000 homes

\$1.5–\$4M

\$150M–\$400M

\$500k–\$1.2M/yr

300 MW

~225,000 homes

\$1.5–\$4M

\$450M–\$1.2B

\$1.5M–\$3.6M/yr

There should be an exponential increase in total infrastructure cost at higher MW loads.

Comparable jurisdictions (Virginia, Oregon, Iowa) experienced demonstrable residential rate increases following multi-hundred-MW data-center clustering, due to utility ability to shift upgrade costs through base-rate cases.

Pennsylvania should not repeat these avoidable outcomes.

IV. Requested revisions before final adoption

To ensure compliance with Title 66 and protect Pennsylvania residents, I request that the Commission modify the model tariff to include:

Mandatory statewide application to all large-load customers above 25 MW

Mandatory assignment of infrastructure and interconnection costs to requesting customers

Prohibition on allocating upgrade costs in residential base rates or rate filings

Mandatory load-indexed contributions to universal service/assistance programs

Mandatory public disclosure of projected

MW load and rate impact analyses before load approval

Transparency requirements for interconnection queue requests and contract approvals

Residential customers must not subsidize multinational corporations acquiring preferential industrial interconnection access.

Electricity is a necessity and captive consumers lack the ability to select providers or avoid cost increases. A voluntary tariff structure cannot prevent discriminatory rate allocation, concealed infrastructure costs, or upward pressure on residential electricity bills. The Commission must adopt mandatory

requirements that ensure fair, lawful allocation of grid-reinforcement costs and prevent speculative high-load industrial development from shifting economic burdens to families and small businesses across Pennsylvania.

Respectfully submitted,
Sherri Homanko