

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Interconnection and Tariffs ) M-2025-3054271  
for Large Load Customers )

**COMMENTS OF VISTRA CORP.  
TO THE NOVEMBER 6, 2025 TENTATIVE ORDER**

**Introduction**

On November 6, 2025, the Pennsylvania Public Utility Commission (“Commission”) entered a *Tentative Order on Interconnection and Tariffs for Large Load Customers* and invited parties to file comments. Vistra Corp. (“Vistra”) appreciates the opportunity to provide comments and hereby submits its comments in response.

As recognized by many commenters in this proceeding, the integration of large loads within Pennsylvania provides a significant economic development opportunity for the Commonwealth in terms of new jobs and growth of the tax base. In restructuring its electric industry, the legislature recognized that the provision of adequate and reliable electric service was integral to the Commonwealth’s ability to compete for industry and jobs. At the same time, the Commission appropriately recognizes the need to balance the economic development opportunity provided by new large load customers with providing safeguards to existing customers. Vistra believes that the model tariff as presented in the Appendix of the *Tentative Order* appropriately strikes this balance.

**I. Commission has an Important Role in Integrating Large Load Customers**

Vistra commends the Commission for opening the above captioned proceeding to aid in the development of a model tariff for Electric Distribution Companies (“EDCs”) relating to the integration of large load customers. As demonstrated by robust stakeholder participation in this

proceeding, there is significant interest in setting guidelines for the terms and conditions of integrating new large load while considering safeguards that protect existing ratepayers from potential stranded costs or cost shifting. Adopting a model tariff provides much needed certainty to both prospective customers and the EDCs while providing guardrails for existing customers.

As an initial matter, Vistra believes it is important for the Commission to continue its work on developing a model tariff to address state-jurisdictional matters related to large load integration. Vistra acknowledges that there is significant interest at both the national and state level related to this topic. On October 23, 2025, the U.S. Department of Energy (“DOE”) directed the Federal Energy Regulatory Commission (“FERC”) to develop an Advanced Notice of Proposed Rulemaking (“ANOPR”) related to the interconnection of large loads to the transmission system. In issuing its directive, the DOE cites the need to ensure “all Americans and domestic industries have access to affordable, reliable, and secure electricity” while noting the need to drive the investment to support domestic manufacturing and AI innovation.<sup>1</sup>

While there are important questions raised about how to ensure the timely and orderly interconnection of large load to the transmission system in the context of FERC’s ANOPR proceeding, DOE correctly notes that the proposal “does not impinge on States’ authority over retail electricity sales.”<sup>2</sup> Vistra continues to believe that there is an important role for states to play in the integration of large loads and that even with an open proceeding at the federal level, this Commission can and should move forward on a model tariff that addresses the areas where the states continue to have authority over large load integration. The Commission has clear jurisdiction over the terms and conditions of retail sales to large loads, siting generation, and the

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<sup>1</sup> Interconnection of Large Loads to the Interstate Transmission System, Letter of Dep’t of Energy Sec. Christopher Wright, Docket No. RM26-4-000, at 1 (filed Oct. 23, 2025)

<sup>2</sup> Sec. Wright Ltr. at 9.

interconnection of customers to the distribution system, all of which are important as stakeholders try to balance the economic development opportunity with the need to provide appropriate safeguards. Vistra believes that the terms and conditions contained within the proposed model tariff are state jurisdictional and urges the Commission to continue this proceeding.

## **II. Model Tariff Appropriately Balances Transparency and Flexibility**

Vistra believes it is appropriate for the Commission to establish minimum standards through a model tariff which will provide important transparency and certainty to new customers looking to locate within the Commonwealth and to the EDCs as they undertake significant buildout of the transmission and distribution system to support this new load. Additionally, given the infrastructure investment needed to support new large customers, it is important that the Commission establish terms and conditions that ensure appropriate cost allocation for this investment and provide existing ratepayers with protection against stranded costs.

As noted in the *Tentative Order*, the proposed model tariff serves as a “guideline” for the EDCs. The model tariff provides potential large load customers with a clear understanding of the requirements and terms and conditions of service through establishing a minimum baseline. Doing so establishes relative consistency across the Commonwealth and ensures a customer is choosing a location based on business needs, not special terms and conditions. Adopting the model tariff as set forth in the Appendix of the *Tentative Order* provides this consistency while still allowing the EDCs to retain certain flexibility to account for unique needs. The model tariff appropriately establishes a baseline set of requirements to integrate large load customers while providing the EDCs with flexibility on certain contract terms.

At the outset, it is important to note that Pennsylvania Statute provides end-use customers with the right to interconnect with the electric transmission<sup>3</sup> and distribution system on a nondiscriminatory basis. Adopting a model tariff for all large load customers as set forth in the Appendix of the *Tentative Order* is an important step towards ensuring similarly situated customers over a certain size threshold are subject to the same minimum terms and conditions.

In addition, the model tariff provides for increased transparency, both in terms of the requirements to interconnect and the timing. Many commenters recognize that certainty around the interconnection process, the associated requirements, and speed to market are all important when making a business decision about where to locate operations. The model tariff addresses these in two ways.

First, the model tariff includes minimum standards for terms and conditions like contract length, minimum demand charge, collateral requirements, and exit fees. The tariff appropriately establishes a baseline while providing customers with flexibility to meet the requirements given their individual needs. Setting a minimum baseline ensures that there are appropriate safeguards in place to integrate new customers while minimizing the risks to existing customers if the customer does not show up or the full load does not materialize. These elements of the model tariff are clearly state-jurisdictional. Vistra encourages the Commission to retain these provisions, as it is important to provide customers with insight into the requirements as well as standardize these requirements to the extent possible across the Commonwealth.

Second, the proposed model tariff provides much needed transparency into timelines and progress in the interconnection process. Vistra supports establishing a maximum time for completion of interconnection studies. The Commonwealth is competing with neighboring states

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<sup>3</sup> Vistra notes that FERC action on the DOE ANOPR may modify the jurisdictional framework through which new large loads interconnect to the transmission system.

to attract large load customers that will provide a significant economic benefit. Currently, there is little insight into the interconnection process for new customers. Establishing a completion timeframe and remedies if the interconnection study is not completed within six months gives customers much needed certainty about how long it may take to complete the interconnection study. Vistra strongly encourages the Commission to retain this provision. While FERC may ultimately seek to establish PJM-wide timelines for the completion of large load interconnection studies when load is interconnecting to the transmission system, the rulemaking process will likely take some time to be completed. It is appropriate for the Commonwealth to establish study process timelines at this time to ensure large load interconnections can proceed on a timely basis.

Finally, the *Tentative Order* proposes reporting requirements related to large load customers. As Vistra noted in previous comments, there is currently uncertainty as to how much and how quickly load growth will materialize. As load growth is one of the key variables in assessing resource adequacy, it is important that the Commission establish a process to better understand the magnitude and timing of this new load. Additionally, Governor Shapiro recently signed into law House Bill 416 (Fiscal Code) as part of the Commonwealth's budget package which sets forth the Commission's authority over load forecasting to ensure accuracy and transparency. Vistra supports the Commission's proposed reporting requirements to support this requirement.

## **Conclusion**

Vistra appreciates the opportunity to submit these comments as the Commission continues to evaluate how to best support large load interconnection within the Commonwealth.

Respectfully Submitted,

/s/ J. Arnold Quinn

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