

Public Comment

December 22, 2025

Re: Docket Number M-2025-3054271 – Tentative Order and Large Load Model Tariff

I submit this comment in strong support of Senator Katie Muth's public comments on the Commission's Tentative Order and proposed Model Tariff for Large Load Customers. While the Commission correctly recognizes that very large new electric loads - particularly data centers which pose serious risks to grid reliability and ratepayer fairness, the proposed framework does not go far enough to protect the public interest.

Pennsylvania's electric grid is already strained, aging, and vulnerable. In many areas, reliability challenges and outage risks exist before the addition of any new large load. Approving energy-intensive facilities without first requiring comprehensive system-wide upgrades places existing residential and small business customers at unacceptable risk. Grid fragility is not theoretical; it is a present condition that large loads will worsen.

Data centers must be required to bear full financial responsibility not only for facilities that directly serve their projects, but also for all transmission and distribution upgrades necessary to ensure system stability, redundancy, and long-term reliability. No large load should be interconnected unless the grid is demonstrably capable of supporting that demand without degrading service even further or shifting costs to existing customers. Where deficiencies exist, upgrades must be completed in advance and need to be funded entirely by the large load customer.

The Tentative Order relies too heavily on a voluntary model tariff and leaves critical protections to utility discretion. This approach invites inconsistency across electric distribution companies, enables negotiated exceptions, and creates clear pathways for cost shifting. Ratepayers should not be required to subsidize infrastructure reinforcement for private, speculative, and highly energy-intensive development.

I strongly support the principles advanced in Senate Bill 1114, including lower applicability thresholds, aggregation of affiliated facilities, enforceable cost-allocation standards, long-term contracts aligned with infrastructure lifespans, clear emergency curtailment rules prioritizing residential and small business customers, and expanded transparency and oversight. These measures are essential to maintaining grid reliability and protecting ratepayers statewide.

Economic development must not come at the expense of reliability, public safety, or affordability. If Pennsylvania chooses to host large data centers, it must do so on terms that ensure that those creating the demand pay the full and true cost of serving it.

The Commission has both the authority and the obligation to adopt binding, statewide regulations rather than a purely advisory model tariff. I respectfully urge the Commission to implement enforceable standards that protects ratepayers, preserves grid integrity, and reflects the real risks of large-load development – and most importantly does not infringe upon or burden the citizens of the state.

Respectfully submitted,

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