

Good afternoon Commissioners,

I am commenting on Docket Number M-2025-3054271, Tentative Order / Model Tariff for Large-Load Electric Customers.

Under 66 Pa.C.S. § 1501, electric utilities are legally required to furnish and maintain safe, adequate, and reliable service to existing customers, and new electric load connections may not impair the reliability or quality of service already being provided. The Pennsylvania Public Utility Commission's long-standing policy further requires that costs follow causation, meaning that infrastructure investments necessitated by new load must be borne by the customer creating the need and may not be shifted onto existing ratepayers.

The U.S. Department of Energy's July 2025 Resource Adequacy Report warns that rapid load growth, particularly from large, energy-intensive users such as data centers, combined with generation retirements, could strain grid reliability if new capacity and infrastructure are not in place ahead of demand. This underscores the importance of ensuring that new large-load customers fully fund the generation, transmission, and distribution upgrades required to serve them, while existing customers are held harmless from both reliability risks and cost increases.

Accordingly, large new load customers, such as data centers, should be permitted to connect only where the necessary infrastructure upgrades are fully funded by the new load and where the electric grid can support the additional demand without increasing outage risk or degrading reliability for existing customers.

Thank you for the opportunity to comment on this important matter.

Kind regards,
Michael Pilch
Archbald, Pa.