

Dear Commissioners,

I submit this comment as a Pennsylvania taxpayer and parent concerned about the Commission's Tentative Order and proposed Model Tariff for Large Load Customers at Docket No. M-2025-3054271. I appreciate the Commission's recognition that very large new electric loads—particularly data centers—pose real risks to grid reliability and to existing customers. However, the Tentative Order does not go far enough to protect families and communities from higher costs, service risks, and long-term infrastructure impacts.

First, the proposed 50-megawatt threshold is too high to reflect real-world conditions. Evidence in this docket shows that loads well below that level can require major infrastructure upgrades, especially in smaller utility territories. As a parent and ratepayer, I am concerned that setting the bar this high allows significant projects to move forward without adequate safeguards, shifting costs and risks onto households that had no role in creating them.

Second, the Tentative Order leaves too much discretion to utilities on cost allocation. Large-load customers often require substantial new infrastructure, and without firm rules, those costs can be rolled into rate base and paid by residential customers. Ratepayers should not subsidize private, high-intensity facilities. Clear requirements are needed to ensure that large-load customers fully pay for the infrastructure built to serve them, including enforceable exit fees and long-term revenue commitments.

Third, five-year minimum contracts are insufficient. Infrastructure built for these facilities lasts decades. Short contracts create a real risk that costs will remain after the customer leaves—again falling on families and small businesses. Long-term contracts that align with the useful life of the infrastructure are essential for basic fairness.

Finally, communities deserve transparency and priority protection. During system emergencies, non-essential large loads should be curtailed before homes, schools, and small businesses. Ongoing reporting and disclosure are also necessary so the public and policymakers can understand the cumulative impacts of large-load growth on electricity costs, land use, water, and local infrastructure.

For these reasons, I urge the Commission to move beyond a voluntary model tariff and adopt binding, uniform regulations that:

- Lower the threshold for defining large-load customers and prevent project splitting,
- Require full cost responsibility by large-load customers,
- Mandate long-term contracts aligned with infrastructure lifespan,
- Establish clear emergency curtailment priority for residential customers, and

- Improve transparency and reporting on large-load impacts statewide.

As a parent and taxpayer, I ask the Commission to ensure that economic development does not come at the expense of household affordability, grid reliability, or community well-being.

Respectfully submitted,

Megan Kennedy