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Dec. 22, 2025

The Honorable Stephen M. DeFrank, Chairman  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2nd Floor  
400 North Street  
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission Tentative Order and Model Tariff for Large Load Customers; Docket No. M-2025-3054271

Dear Chairman DeFrank,

Thank you for the opportunity to comment on the PUC's Tentative Order and Model Tariff for Large Load Customers, Docket No. M-2025-3054271.

As high-demand data centers and other large load energy customers come online, it is critical that residential ratepayers and the stability and reliability of our energy grid are protected. Pennsylvania families and taxpayers should not be left footing the bill for the massive power needs of data centers or bearing the environmental or public health impacts of data center development.

I applaud the efforts of the Commission to take proactive measures to manage this unprecedented demand, but I also believe the model tariff does not go far enough in protecting the public interest.

To that end, I urge the Commission to include language in the tariff that would accomplish the following:

- Protect residential and small business ratepayers in Pennsylvania from absorbing any additional costs created by data centers and other large load customers.

- Require data centers and other large load customers to bear the full cost of any infrastructure upgrades and system impacts they create. These costs can run into hundreds of millions of dollars. Without regulatory or legislative safeguards in place, they are spread across all utility customers, leaving families, seniors, and small businesses to subsidize costs created by the largest energy users.
- Require large load customers to bring their own **new** generation as a condition of firm service.
- Include a demand response requirement for large load customers as a component of resource adequacy and long-term system planning, rather than relying solely on voluntary incentives for flexible service. A clearly defined demand response obligation would allow the Commission and utilities to account for load flexibility as a planning resource, reduce the need for peak-driven infrastructure investments, and ensure that the costs and risks associated with maintaining resource adequacy are borne by the large load customers whose demand drives those needs.
- Reconsider and lower the proposed thresholds of 50 MW for individual customers and 100 MW in the aggregate used to define large load customers. Electric loads well below these thresholds can still drive significant planning costs, operational risks, and strain on infrastructure, particularly when introduced rapidly or in geographically concentrated areas. Adjusting the thresholds downward would better protect existing customers from undue cost and reliability impacts and ensure compliance with the Commission’s obligation to maintain adequate and reliable service.
- Ensure that data centers—not residential ratepayers—are liable for any stranded costs if a facility closes or ends up needing less energy than it asked the utility to supply.
- Require or strongly incentivize large-load customers to self-supply or procure clean, renewable energy and/or battery storage to mitigate environmental and grid-impact concerns.
- Require consideration of all factors affecting the public interest, including affordability and grid reliability, but also public health and environmental impacts, such as emissions, water use, and land use.
- Ensure transparency, public accountability, and stakeholder participation in the final adoption of this model tariff—including feedback from economic justice advocates, consumer advocates, and environmental groups—to ensure fairness beyond just cost allocation.

While I appreciate the steps the Commission has taken thus far, I ask that you use your full regulatory authority to ensure resource adequacy and grid reliability and explicitly implement and enforce robust public interest, clean energy, environmental protection, and community engagement standards.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Danielle Friel Otten". The signature is written in a cursive, flowing style.

Danielle Friel Otten  
State Representative  
155th Legislative District