

December 22, 2025

Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
Submitted electronically via PUC E-File

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

Dear Commissioners,

Please accept this public comment letter outlining my concerns on the Commission's Tentative Order and proposed Model Tariff for Large Load Customers at Docket Number M-2025-3054271.

As a residential ratepayer in PA, I appreciate that this Tentative Order attempts to recognize and address the risks presented by the cumulative effect of large load additions (data centers and the equivalent high-energy use facilities). However, I believe that the framework presented is insufficient to adequately protect ratepayers. Please refer to the detailed Public Comment from Senator Katie Muth, 5-Muth: PUC Large-Load Model Tariff Public Comment 12.22.25, for a comprehensive gap analysis that I fully endorse. I have included the outline of main concerns below:

- 1) Application of the Model Tariff to customers operating at/above 50 megawatts (100 megawatts aggregate) is too restrictive and does not take into consideration the infrastructure strains on smaller electric distribution companies (EDC) and cumulative/aggregate impacts of multiple smaller load additions. Refer to the proposed Ratepayer Protection Act (Senate Bill 1114) for more comprehensive inclusion criteria. There are currently no limitations in the Public Utility code requiring the Commission to set the threshold at/above 50 megawatts.
- 2) While the proposed Model Tariff's framework recognizes the risk of large load customers cost shifting/subsidizing to residential and small business ratepayers, it still allows EDCs unregulated ability to shift responsibility for certain distribution facilities based on whether the large load customer "receives the majority of benefits" from that facility – the broadness of this definition gives leeway to

assigning cost-allocation to other customers. These requirements should be strengthened to ensure that the infrastructure required to serve large load customers is paid for by large load customers alone.

- 3) Long-term contract requirements should be standardized to a minimum of 20 years.
- 4) Curtailment rules requiring non-critical large loads (definition of non-critical requires enhanced scrutiny) should be applied such that large loads be curtailed before any residential or small business customers.
- 5) Annual reporting requirements should be required and provide sufficient transparency so that the general public and public servants can monitor the cumulative effects.
- 6) Binding regulations must be adopted to ensure full cost responsibility, grid reliability and protection of existing ratepayers. Adoption of a nonbinding advisory model tariff is insufficient alone.

In addition, additional binding regulatory framework must be implemented to protect communities in the commonwealth beyond cost allocation and interconnection. Residential rate payers are concerned about environmental impacts – water use, land development, sound and chemical pollution, and the unforeseen long-term impacts on our local infrastructures.

Transparency measures alone are insufficient to address these concerns, and a binding regulatory framework must be applied proactively as many of these consequences are irreversible. Confidential agreements put communities at risk – visibility is required for both policymakers and the public.

Thank you for the opportunity to comment and voice my concerns as a resident of the commonwealth.

Karen Bingham Ferlez

Chester County, PA