

Dear Commissioners,

Thank you for the opportunity to provide comments. As a resident of Pennsylvania, I urge the PUC to ensure that residential customers do not bear the financial costs -- in addition to the environmental and health costs we will already bear -- for data centers' energy needs. With limited time to read others' comments and reply, I want to lift up the comments provided by James S. Elliott and Senator Williams.

From James S. Elliott's comments, I underscore the following concerns and recommendations:

The Commission's Tentative Order applies the Model Tariff only to customers at or above 50 megawatts, ignoring evidence that smaller loads (as low as 5–20 MW) can also strain infrastructure. I urge the Commission to adopt lower, more realistic thresholds and anti-circumvention rules, as proposed in the Pennsylvania Ratepayer Protection Act (Senate Bill 1114), to better protect reliability and planning.

Large load interconnections often require substantial upgrades. The current framework allows Electric Distribution Companies (EDCs) too much discretion, risking cost-shifting to residential and small business customers. Costs associated with serving large-load customers should be directly assigned to those customers, with transparent calculations and enforceable financial protections.

Large load growth affects water use, land development, and local infrastructure. The Commission's current approach lacks robust transparency and reporting. Stronger annual reporting, consistent tariff provisions, and disclosure requirements are needed to ensure public oversight.

The Tentative Order identifies tools to mitigate risks but treats them as optional. Uniform, mandatory protections—such as long-term contracts, collateral, exit fees, and emergency curtailment rules—are essential for equity and reliability.

Additionally, in order to prevent cost-shifting from speculative or short-lived data center investments onto existing ratepayers, Pennsylvania must require a minimum contract term of 20-40 years. Allowing residential customers to bear the burden of the industry's speculative investments is unfair, as we also already bear the burden of environmental harm and other negative impacts of buildout, with none of the financial benefits.

I agree with Senator Williams comments on the following items:

New large load customers must fully cover the increased energy costs they are causing. In addition to contributing to hardship funds as proposed, a proportionate level of universal service program costs should also be assigned to large load customers. To help safeguard against stranded investments, I recommend the model tariff include both a flat upfront fee and an ongoing volumetric charge.

Rebuttal Presumption: The terms “Network Improvements” and “Network Improvement Costs” are defined in the tentative order but not used elsewhere in the model tariff. Their inclusion in the definitions and reference to the “majority” or “equivalent” of the benefits the customer receives prompts me to elevate CAUSEPA and TURN’s June 6, 2025 comments submitted during the en banc hearing.

The Commission should adopt a rebuttal presumption that distribution system upgrades needed to support data center growth are solely for the benefit of the large user. A public utility shall not be permitted to assign costs to non-large load ratepayers based on generalized, ancillary, or theoretical benefits to those ratepayers absent actual, quantifiable evidence demonstrating that such costs incurred were necessary for a purpose other than the electricity demand of the large load customer.

The introduction of data centers to a region should not result in costs to residential consumers for system upgrades that otherwise would not be needed. The model tariff should prevent utilities from shifting expenditures across the general rate base, so residential households are not forced to absorb costs created by data centers.

- CBAs: Pennsylvania’s model tariff should require data centers developers to enter into transparent, negotiated Community Benefits Agreements (CBAs) that delineate up front how the local community will benefit and be protected. The terms of the CBA should be openly arranged and discussed among the host, surrounding communities, and community members to ensure transparency and sustainable conditions, while having the mutual benefit of building trust and support for the development.

- Public Hearing: With recognition that the Commission already held an en banc hearing that invited public comment, the public engagement around this issue is higher now than even earlier this year when this case was originated. In order to promote transparency, public accountability, and robust stakeholder participation, the PUC should schedule a public hearing prior to final adoption of the model tariff.

Thank you,  
Linnea Bond