

Dear Commission:

I commend the Commission for realizing the potential negative economic impact of unregulated connection of large load data centers for utility rate payers and taking action to mitigate the negative impact on electric distribution rates through this tentative order.

I would like to open by reiterating the Pennsylvania Public Utilities Commission mission: “ By regulating electric utilities & balancing the needs of consumers and the industry, the PUC aims to ensure safe and reliable service at reasonable rates”. I hope that the commission’s actions on Commission’s Tentative Order and proposed Model Tariff for Large Load Customers Docket Number M-2025-3054271 will support their stated mission of providing electric service at reasonable rates.

State Senator Katie Muth’s comment “Large load interconnections often require substantial upgrades to existing infrastructure, and without clear protections those costs may be rolled into rate base..... However, the proposed Model Tariff’s framework still allows Electric Distribution Company’s (EDCs) unchecked discretion and includes limiting concepts, such as assigning responsibility for certain incremental distribution facilities based on whether the large load customer “receives the majority of benefits” from that facility, which can leave room for costs to be treated as broadly beneficial and recovered from other customers.”, mirrors my concern that an independent oversight process is necessary to ensure utilities follow consistent guidelines for deeming if upgrades costs should be spread across the entire rate payer base.

It is my opinion that the identification of large loads in regards to MW requirements should mirror the recommendations of the proposed Pennsylvania Ratepayer Protection Act (Senate Bill 1114).

It is my opinion that an independent oversight process is required so that Electric Distribution Company’s (EDCs) decisions on making infrastructure costs for connecting large loads follow practices that are consistent and fair to all ratepayers.

I support the Pennsylvania Ratepayer Protection Act (Senate Bill 1114) requirement of annual reports to the General Assembly on the cumulative impacts of large-load growth, mandating consistent tariff provisions across all electric distribution companies, and requiring disclosure of large-load contracts.