

December 22, 2025

Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

**Re:** Public Comment — Model Tariff for Large Load Customers  
Docket No. M-2025-3054271

Dear Secretary and Commissioners,

My name is Cara Ivens, and I am a Pennsylvania resident and electric customer. **I am submitting this public comment to urge the Commission to adopt the proposed Model Tariff for Large Load Customers immediately**, and to strengthen it so residential customers are not forced to subsidize hyperscale data centers and other massive “large load” projects.

**Abandonment and “stranded site” risk is real — and crypto/bitcoin mining is the clearest warning sign for data centers.** Pennsylvania already has a real-world example of what happens when energy-hungry computing doesn’t pencil out: gas-powered crypto/bitcoin mining operations that show up fast, run hard, and then disappear—leaving regulators and communities scrambling after the fact. **Longhorn Pad A is a cautionary tale precisely because it involved the same pattern this Commission is dealing with now: high-load computing tied to energy infrastructure, followed by equipment removal and abandonment concerns once the economics or scrutiny shifted.**

Here is the part the PUC needs to take seriously: data center technology is progressing so fast that it is entirely foreseeable these companies will abandon “today’s” facilities in just a few years when newer, more efficient designs make the old ones uncompetitive. This isn’t speculation—globally, the industry is racing to improve efficiency (especially cooling and overall energy use). Countries like China are pushing aggressive efficiency targets and modernization for data centers and cracking down on wasteful buildouts. In plain terms: the “state of the art” is changing quickly, and what looks economically viable today may look outdated and inefficient very soon.

That means the risk to Pennsylvania ratepayers is obvious: if utilities build substations, feeders, and upgrades around a hyperscale load, and that load becomes obsolete or uneconomic and walks away, **residents will be stuck paying for stranded infrastructure.** That is exactly why the Large Load Model Tariff must have real teeth: strong upfront security, real exit/termination liability, and protections against socializing upgrades onto households—because the crypto/bitcoin boom-and-bust pattern shows what happens when a high-load computing business model exits quickly, and rapid efficiency gains make “abandon and rebuild somewhere else” even more likely.

**Pass the tariff—now. It’s not enough, but it’s something, and the PUC must stop cost-shifting.** The basic idea behind this model tariff is common sense: if a private company wants to bring an enormous new load onto the grid, that company should bear the risks and costs it triggers—not ordinary households. Requirements like meaningful financial security/collateral, enforceable minimum terms, and early termination/exit fees are the bare minimum to protect customers from stranded infrastructure and speculative projects. But to be clear: the tariff is not enough if it’s optional or weakly enforced. It has to be strong, statewide, and not something utilities can sidestep when it’s inconvenient.

**Affordability is not theoretical. Last winter I got an electric bill around \$1,100.** I can speak from personal experience about what “affordability pressure” really means. **Last winter I received an electric bill of approximately \$1,100. How much more does the Commission expect ordinary people to absorb?** This isn’t

just a matter of trimming “usage” or shopping suppliers. Many **Pennsylvania residents live in housing and on infrastructure that was not built with today’s rapidly escalating energy costs in mind**—things like electric water heaters, well pumps, baseboard heat, older insulation, and older electrical systems can make winter bills explode even when families are trying to be careful. People can’t instantly remodel their homes, replace major appliances, or change how their water is delivered just because rates keep rising. Approving policies that encourage massive new large-load demand—while residents already face extreme bills—feels like forcing households to subsidize private development at the expense of basic living costs.

**Citizens are sounding the alarm: communities do not want unchecked data center expansion.** Across Pennsylvania, residents are already fighting data center proposals and organizing locally because they see what these facilities can bring: land-use disruption, noise, heavy infrastructure, and pressure on utilities—followed by “we need another increase” messaging that households are forced to swallow. The Commission should not dismiss these public warnings. People aren’t being dramatic. They’re responding rationally to the pattern they’ve lived through. **And this pushback is happening early—before many of these projects are even fully built or energized.**

If the Commission thinks the public response is “loud” now, this is the calm before the storm. Wait until these facilities are operating, drawing massive power, straining local infrastructure, and influencing bills. By then, the harm will already be locked in through sunk infrastructure costs and long-term system commitments. That is why the Commission must act now, not after the impacts show up on every household’s bill.

**I want to be crystal clear: I see what PPL is trying to do—be both the wires monopoly and an “electric company” again.** After Pennsylvania’s restructuring, utilities like **PPL Electric Utilities** operate as electric distribution companies (EDCs)—they’re the regulated monopoly for the **wires (delivery)**, while generation is supposed to be separate from the regulated “delivery” monopoly. But PPL is plainly positioning to move back toward the old vertically integrated world where the utility ecosystem benefits both from delivering electricity and from owning/controlling the power supply that serves load growth. In public reporting and PPL’s own announcements, that strategy is not subtle:

- **PPL + Blackstone joint venture:** PPL announced a joint venture with Blackstone Infrastructure to build, own, and operate new gas-fired generation in Pennsylvania tied to powering data centers under long-term agreements.
- **Policy push:** there is active discussion and legislative movement around allowing distribution utilities to reenter generation ownership again—an enormous policy shift that would reshape incentives and risks for customers.
- **Restructuring-statute activity:** bills have been introduced in Pennsylvania that sit in the restructuring space and would affect the duties and structure of EDCs.

This is exactly why the Large Load Model Tariff needs teeth. When the same utility ecosystem can profit by attracting hyperscale loads and profit again through generation and supply arrangements that serve those loads, the incentive is obvious: **build big, connect fast, recover costs, and socialize the long-term risk onto residents** through rate cases and “system needs.”

**PECO isn’t publicly doing the same generation push yet—but if PPL is allowed to pivot this way, PECO and others will be pressured to follow.** Right now, I’m not seeing PECO publicly announcing a PPL-style plan to build new gas generation in Pennsylvania specifically “to power data centers” under long-term energy service agreements. However, utilities do seek expanded ownership of grid-side assets (including pushes related to utility-owned storage and similar infrastructure). Here is the problem: if Pennsylvania policy shifts so EDCs can “compete” for hyperscale projects by expanding into supply-side or utility-owned asset models while large-load demand surges, then **PECO and every other EDC will be pressured to chase the same playbook.** That doesn’t protect customers. It escalates an arms race—while households get stuck with higher bills and stranded-infrastructure risk.

And this leads to another issue that is already making people furious: **pricing transparency**. Regular customers are already struggling to understand their bills because charges are split across supply vs. delivery, plus riders, fees, and periodic price changes. People shouldn't need a decoder ring to understand why they are paying more. If the PUC allows a future where utilities can expand roles and revenue streams while hyperscale loads reshape the system, customers will face an even worse reality: **higher costs with less clarity**, and it will become harder for ordinary people to tell what part of their bill is rising and why. That is unfair, and it should weigh heavily in favor of strong, enforceable large-load protections and transparency requirements.

**Frankly, this feels like a show—because year after year the PUC keeps approving hikes while families drown.** I'm going to say this plainly: **I have watched these hearings.** I've listened to Pennsylvanians—working people, seniors, families—explain how they're already stretched to the limit, and then I've watched the cycle repeat: the utility asks for more, the public begs for relief, and the Commission approves another increase anyway. At this point, it doesn't feel like meaningful oversight. It feels like the outcome is pre-decided and the public comment process is just something people are allowed to do on the way to the same result.

And I reject the idea that the Commission is powerless. **The PUC has the authority to deny requests, reduce them, or require strict conditions.** If a filing is not justified, not reasonable, or not in the public interest, you are not required to rubber-stamp it. Yet year after year, customers are told increases are “unavoidable,” while the Commonwealth simultaneously welcomes massive new industrial loads that will obviously drive new infrastructure spending and new system stress—setting up the next round of rate hikes. If you want Pennsylvanians to believe this isn't performative, prove it here. Adopt the Large Load Model Tariff and strengthen it with enforceable, statewide protections that prevent cost-shifting, prevent stranded infrastructure costs, and put residential customers first for once.

**Additionally, data centers don't just impact electricity. We are in drought conditions—Pennsylvania cannot host water-hungry mega-facilities like this.** Right now, parts of Pennsylvania are dealing with drought conditions and water stress, and families and municipalities are being told to conserve and protect local supplies. In that context, it is reckless to fast-track or normalize the expansion of facilities that can consume enormous volumes of water for cooling. Data centers are not “invisible” buildings—they can be major industrial water users, and that demand competes directly with residential needs, firefighting capacity, and municipal system limits. When we're already watching water levels and being told to conserve, Pennsylvania should not be approving a buildout that effectively turns local water into a private industrial input for hyperscale computing.

**Pennsylvania already has PFAS contamination concerns—our water systems are under enough stress.** Pennsylvania has well-documented PFAS contamination concerns in drinking water. Many communities are already dealing with the costs and logistics of monitoring, treatment, and compliance, and residents are worried about what's in their tap water. In that reality, adding major new industrial demand and infrastructure stress should not be treated casually. It should trigger extreme caution, transparency, and enforceable protections. The public should not be forced to absorb additional strain on water systems while also being told to accept ever-rising electric costs to support private data center expansion.

### **What I am asking the PUC to do**

1. Adopt the Large Load Model Tariff without delay—and do not water it down.
2. Make the protections mandatory and enforceable statewide, not a voluntary “menu” that can be ignored.
3. No cost-shifting / no socialized upgrades: require upfront contributions and strong financial security so households are not charged for infrastructure built primarily to serve hyperscale loads.
4. Stronger stranded-cost and exit protections: higher, enforceable exit fees; clear treatment of upgrades that become unnecessary if a load leaves or never fully energizes; and strict rules for projects that fail to ramp as promised.

5. Water transparency requirements: large loads must disclose cooling method, expected water use, and source—and they should not be treated as ordinary customers during drought conditions.
6. Corporate transparency: require disclosure of corporate structure/affiliates and business model so the Commission and public can assess risk (including abandonment and credit risk).

Pennsylvanians are not an ATM for speculative infrastructure. Pass the tariff and strengthen it. If the Commission wants the public to believe it's not just going through the motions, this is the moment to prove it.

Respectfully submitted,

**Cara Ivens**

Phoenixville, Pennsylvania