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May 6, 2026

**VIA ELECTRONIC FILING**

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**Re: Data Request to Gather Information in Connection with Developing Regulations for Interconnecting Loads**
**Docket No.: L-2025-3059032**

Dear Secretary Homsher:

Enclosed for filing please find the responses of FirstEnergy Pennsylvania Electric Company ("FE PA") to the data requests issued by the Bureau of Technical Utility Services via the Secretary Letter dated April 29, 2026, in the above-captioned matter.

Should you have any questions or concerns regarding this information, please feel free to contact me.

Sincerely,

Timothy K. McHugh

Enclosures

Cc: Joseph Sherrick, TUS (via email only: josherrick@pa.gov)
Joseph Cardinale, PUC LAW (via email only: jcardinale@pa.gov)
Kriss Brown, PUC LAW (via email only: kribrown@pa.gov)

**TUS Data Request Set 1**
**Load Interconnection Questionnaire**
**At Docket L-2026-3059032**
**Response of FirstEnergy Pennsylvania Electric Company**

Prepared by: John Martinez and Walter Woods

Response Date: May 6, 2026

**TUS 1-1**

Is there an online portal through which applicants can/should submit all applications and supporting documents?

**RESPONSE:**

Transmission load interconnection request forms are available on the FirstEnergy website. However, the forms are submitted to an email box.

Yes, for distribution an application can be submitted online and a designated customer contact employee coordinates with the customer to submit the supporting documentation.

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**TUS 1-2**

Once an interconnection request is submitted is the applicant provided a direct contact for further communications associated with the request or is the customer only provided a resource account or similar general reference for contact?

- What information on queue position, status of load study, anticipated timeline for completion is made available to applicants on an ongoing basis?
- At what frequency is this information communicated to applicants?

**RESPONSE:**

For transmission-level requests, information on queue position and study status is provided through the customer representative assigned to the project. Updates are provided at defined milestone checkpoints and as material changes occur, which are supplemented by direct communications as needed or requested. The customer representative is supported by relevant engineering groups as needed.

For distribution requests, a direct contact is provided based on the load connection type and customer classification (i.e., residential, commercial/industrial or national account).

Upon submission of the initial request, a minimum study completion timeline, expressed in business days and an estimated earliest completion date, is provided by the customer contact. In the event the minimum timeline is not achieved, an updated completion date is communicated to the customer when determined or upon request. Customers are notified that requests are managed on a first-come, first-served basis. Queue placement is provided to the customer upon request.

The information is communicated with the study origination, when the minimum timeline is exceeded or a delay is identified, during regularly scheduled update meetings, and when an update is requested by the customer.

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**TUS 1-3**

Is there a single queue that includes both load and generation interconnection requests?

- If so, would it be helpful if there were separate queues?

**RESPONSE:**

Transmission requests enter a single queue that includes both generation and load requests. Separate queues may help with prioritization, but requests are easily filtered by connection type (load/generation).

Distribution maintains separate queues.

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**TUS 1-4**

Do the same staff review both generation and load interconnection requests?

**RESPONSE:**

Transmission requests are reviewed by subject-matter experts supporting area specific issues.

Distribution requests are reviewed by staff who focus only on generation.

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**TUS 1-5**

What are the different levels of interconnection review for load requests (i.e. single phase, three phase primary service, three phase secondary service, or other)?

**RESPONSE:**

All connections at the transmission level are three phase. The level of study depends on load size, voltage, and system impact.

Distribution requests are reviewed for all of the above and also include arc flash and motor requests.

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**TUS 1-6**

Please explain any differences between generation and load interconnection applications and construction process.

**RESPONSE:**

Transmission load interconnections focus on serving customer demand and thermal/voltage adequacy, while transmission generation interconnections emphasize system deliverability and stability. Construction responsibilities and cost allocation also differ based on service type, amount of load, and tariff provisions. There are also differences between market (administered by PJM) and non-market generation (administered by FE PA, e.g.roof top solar).

There are separate communication and process paths for distribution load and generation requests. Distribution generation requests follow different application and construction workflows depending on the generation program, in alignment with program rules. Also, customer contacts and application processes differ between load and generation. The study agreements and construction agreements are similar and the construction process is the same.

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**TUS 1-7**

What is the application fee structure for the various levels of load interconnection?

- Does the process allow/provide for electronic payments without administrative service fees?

**RESPONSE:**

The transmission detailed load study application fee structure is dependent on load ranging from $5,000 - $500,000.

- Less than 10 MVA: $5,000
- Greater than 10 MVA to 20 MVA: $10,000
- Greater than 20 MVA to 50 MVA: $20,000
- Greater than 50 MVA to 100 MVA: $50,000
- Greater than 100 MVA to 250 MVA: $100,000
- Greater than 250 MVA to 1 GVA: $250,000

Greater than 1 GVA: $500,000

- Service fees will apply to ACH/echeck and credit/debit payments. ACI Worldwide, is the third party with whom FirstEnergy Service Company has contracted to provide the One-Time Bank Account Payment, One-time Credit Card Payment and Guest Payment options.

The distribution fee structure is as follows:

- High Level Study (HLS) = no charge.
- Detailed Load Study (DLS):
  - < 1 MW = $2,000;
  - 1 MW – 9.99 MW = $5,000; or
  - 10 MW and above = $10,000.
- Payments may be made over the phone, US or overnight mail, or an online payment. There are third party service fees for online payments.

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**TUS 1-8**

What studies do load interconnection requests undergo (similar to generation interconnection requests) and are there stated timelines for completion?

**RESPONSE:**

Transmission-level load requests more than or equal to 50 mVA undergo a conceptual load study (30-60 days), detailed load study (DLS) Step 1 (90 days) with customer action required to move to Step 2, and DLS Step 2 (180 days; runs concurrently with Step 1) with customer action required to continue the project (i.e., move to construction phase). Transmission-level load requests less than 50 mVA may undergo a conceptual load study (30-60 days), detailed load study (180 days) i.e., move to construction phase). Step 1 will not occur with these requests.

Distribution load requests may require a high-level study (minimum 30 business days), a DLS (minimum 120 business days, or minimum 90 business days in less congested areas), or both. Load studies and timelines are different than generation requests. Distribution generation requests require a feasibility study and an impact study, with overall study timelines ranging from 6 to 12 months.

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**TUS 1-9**

What, if any, prescribed timelines exist to complete the various levels of load interconnection requests?

**RESPONSE:**

See the Company's response to TUS DR 1-8.

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**TUS 1-10**

For load interconnection requests that include co-located generation:

- Are the load and generation requests processed by the same staff or differing staff for load and generation?
- Is there any effort to expedite generation interconnection if it is co-located with a load request?
- What steps can be taken to facilitate generation review and interconnection on a similar timeline with the requested load review and interconnection?

**RESPONSE:**

Transmission requests:

- Requests are coordinated by the same transmission planning staff, with specialized support as needed.
- No preferential treatment is provided beyond coordination efficiencies.
- Submitting complete, well-coordinated load and generation requests simultaneously and minimizing design changes helps align study schedules. Understanding the intended use of the generation is also needed, identifying if it is behind the meter or participating in the PJM Market.

Distribution Requests:

- The studies may be processed by the same staff but are usually studied separately. Completion timelines may vary based on the queues. (See the Company's response to TUS DR 1-8.) When aligned, the reviews are consolidated.
- Yes, if the processes align. Timing depends on queue placement, which is managed on a first-come, first-served basis, and customers are not bypassed in the queue. This scenario is not encountered frequently.

- Timing will depend on queue placement, which is managed on a first-come, first-served basis, and customers are not bypassed in the queue. If the queue placement aligns, load and generation studies may be processed on a similar timeline.

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**TUS 1-11**

What are the most common load interconnection application omissions, errors and/or oversights that contribute to delays in the review process?

**RESPONSE:**

Common transmission application issues include, but are not limited to, incomplete load profiles, unclear phasing or voltage requirements, insufficient site control documentation and FirstEnergy facility location/space requirements, and late changes to application for requested capacity. Unrealistic requested in-service dates and lack of coordination with co-located generation requests may also cause delays.

Common distribution issues include, but are not limited to, incomplete or inadequate customer provided data required for the study (e.g., load specifics, motor details, site plans, or the specific interconnection location), changes to application data after the study has started or has been completed, and right-of-way or easement issues identified after study completion which may delay the subsequent studies in the queue.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

Re: TUS Data Request Set 1 - LOAD INTERCONNECTION

VERIFICATION

I, Mark E. Myers, hereby state that the facts set forth above are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. 4904 (relating to unsworn falsification to authorities). Date 5/6/2026

Mark E. Myers
Director Engineering