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E-FILE

May 8, 2026

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17120-3265

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 on behalf of PPL Electric Utilities Corporation ("PPL Electric"), please find PPL Electric's data request responses, being filed pursuant to the April 29, 2026 Secretarial Letter in the above-referenced matter.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

Michael J. Shafer

Enclosure

cc via email: Joseph Sherrick

WITNESS: Kimberly Gauntner

PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services (TUS)
Dated April 29, 2026
Docket No. L-2025-3059032

TUS I-1	Is there an online portal through which applicants can/should submit all applications and supporting documents?
PPL Electric Response	PPL Electric Utilities ("PPL Electric" or "the Company") has an online portal that accepts single-phase load applications and supporting documents as well as single-phase and three-phase Distributed Energy Resources (DER) applications for existing customers below 69kV. Additionally, any applications for DER under 69kV, where the customer does not have an existing account and/or meter, or, are co-located and non-renewable, must be submitted via email to the Company's Interconnections Department. Applications for generation at 69kV or higher are first submitted by the customer to PJM, then provided to the Company PJM for review. All three-phase load applications, for any voltage class, must be emailed to the Company's Business Accounts or Interconnections Departments.

WITNESS: Kimberly Gauntner

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TUS I-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?

PPL Electric Response

For load applications below 69kV, PPL Electric Utilities ("PPL Electric") shall provide a response to the applicant within five business days upon receipt of a completed application. The applicant will receive contact information for the PPL Electric personnel assigned to manage the application, along with an internal tracking number. The designated representative may change during the project as it progresses through various stages. Information regarding queue position, study status, and anticipated timelines will be furnished upon request.

For load applications at 69kV or higher, a Project Manager for PPL Electric manages each request and serves as the primary point of contact for the customer until the new load is in-service. After submitting a completed application, customers receive a timeline of approximately 60 days for the load study to be complete. Queue positions are generally not provided.

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TUS I-3	Is there a single queue that includes both load and generation interconnection requests? o If so, would it be helpful if there were separate queues?
PPL Electric Response	PPL Electric uses strict queues for generation requests. There is no load queue, and the Company works on load requests in parallel in a non-discriminatory manner.

WITNESS: Kimberly Gauntner

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TUS I-4	Do the same staff review both generation and load interconnection requests?
PPL Electric Response	For load applications under 69kV, dedicated personnel are assigned to review load and interconnection requests separately. For applications at 69kV or higher, a unified department, separate from the personnel mentioned above, is responsible for evaluating both load and generation requests.

WITNESS: Kimberly Gauntner

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TUS I-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)?

PPL Electric Response

PPL Electric has the following different levels of load request:

- Single-phase, 600A and below
- Single-phase, greater than 600A
- Three-phase secondary
- Three-phase primary (12.47kV)
- Transmission service (69kV or higher)
- Underground Residential Development (URD)

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TUS I-6 Please explain any differences between generation and load interconnection applications and construction process.

PPL Electric Response The table below delineates the differences for applications below 69kV:

	Generation Interconnection	**Load Interconnection**
Application Fee	Yes	No
Study requirements	Load, voltage, flicker, phase balancing, and protection	Load, voltage, flicker, protection, reverse power flow, synchronous protection assessment
Company/Customer Interface	One single department throughout	Point of contact may depend on the stage of the application.
Payments	Before construction	Before construction unless otherwise pre-determined.
Design	Same process for generation and load	
Construction	Same process for generation and load	

For generation applications at 69kV or above, the process is managed by PJM, with PPL Electric's involvement as appropriate. This methodology is markedly different than the process for load requests. Notable distinctions include the imposition of application fees and different payment schedules for generation requests, which are not required for load requests. The design and construction processes are very similar for generation and load interconnection applications.

Regardless of the application type, customers are assigned a PPL Project Manager to serve as their primary point of contact throughout their project.

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TUS I-7	What is the application fee structure for the various levels of load interconnection? o Does the process allow/provide for electronic payments without administrative service fees?
PPL Electric Response	PPL Electric does not charge fees for load interconnection applications at any voltage level. However, load requests require the customer to sign a Letter of Authorization where the customer agrees to pay the costs for detailed engineering.

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TUS I-8	What studies do load interconnection requests undergo (similar to generation interconnection requests) and are there stated timelines for completion?
PPL Electric Response	All load requests for applications below 69kV are modeled in commercially available load flow software whereby the system upgrades required to serve the customer's load are identified, including but not limited to, overload conditions, voltage violations, flicker, phase balancing, etc. These system upgrades are delineated in PPL Electric's response to the customer. The Company does not offer specific study completion timelines, however, guidelines for different scenarios including single-phase and three-phase service are available on the Company's website. These guidelines suggest how far in advance a customer should apply before their desired need date. For load interconnections at 69kV or higher, the Company targets completion of the system impact study and issuance of study results within 60 days following receipt of a complete application.

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TUS I-9

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

PPL Electric Response

PPL Electric maintains defined timelines for certain stages of the load interconnection process; however, the total project duration varies based on the impact the load request may have on the system and what upgrades are needed to safely and reliably connect the customer. This includes system conditions, load characteristics, and construction requirements.

For load interconnections below 69 kV, the Company follows internal process guidelines that establish expected timeframes for key milestones. These timeframes are indicative and may vary depending on the size and complexity of the request.

Typical milestones include:

- **Application Processing:** Initiated upon receipt of a complete application.
- **Initial Customer Contact:** Within five (5) business days.
- **Engineering/Design:** Duration varies based on load size, system impacts, customer coordination, and project complexity.
- **Invoicing:** Construction activities commence after payment is received.
- **Construction:** Typically begins following payment and may take approximately eight (8) weeks to complete, subject to material availability, system conditions, and scheduling constraints.

For load interconnection requests at 69 kV or higher, the Company targets completion of the system impact study and issuance of study results within approximately 60 days following receipt of a complete application.

These timelines are provided for general informational purposes only and do not constitute guaranteed service intervals. Actual timelines may be extended due to engineering requirements, permitting, material procurement, or construction constraints.

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TUS I-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?

PPL Electric Response

PPL Electric ("the Company") defines co-located generation as a scenario where the generation is behind the same meter as the load.

For installations under 69kV, the Company rarely encounters cases involving both new load and new generation applications at the same site. When the generator intends to export through net metering, the Interconnections and Planning departments conduct independent evaluations of each component, collaborating to harmonize their analyses and coordinate any necessary infrastructure upgrades specific to each application type. Therefore, in this scenario, co-located facilities must submit two individual applications, one for load and one for generation. Any co-located generation where the generator will not export to the grid is managed within the customer's load request, with input from relevant departments to ensure safe and reliable service.

For applications at 69kV or higher, cases involving generation intended for export to the system and participation in the PJM wholesale market, the application must first be submitted to PJM in accordance with their established process prior to Company review. For behind-the-meter generation designed primarily to offset a customer's own load, these applications may be submitted concurrently and are managed by the same

team; however, co-located generation projects necessitate additional technical analysis.

For applications under 69kV, load and generation requests are managed based on their respective positions in the queue. Given the significant volume of both load and generation inquiries at this voltage level, co-location does not affect the established process.

For applications involving voltages at 69kV or above, the procedure varies based on whether generation occurs in front of the meter—necessitating an application to PJM—or behind the meter, as outlined above. Co-located generation does not affect or accelerate a customer's queue position, since these requests are managed by the same team and system impacts and studies are efficiently organized, there is considerable alignment when behind-the-meter generation is paired with a load. In this scenario, the Company continues to target completion of the system impact study and issuance of study results within 60 days following receipt of a complete application.

For applications under 69kV, both generation requests are processed according to their position in the queue and load applications are coordinated in a similar manner in the event of co-location.

For applications at 69kV or above, the PJM Interconnection oversees the process and manages the queue for generation requests. In both cases, established procedures are followed and timelines for review are already aligned, ensuring efficient and transparent handling consistent with the Company’s procedures and practices.

PPL Electric has not seen many co-located generation with load requests. Provided that the generation does not need PJM review, the Company’s current processes can accommodate similar review timelines. If the generation requires PJM review there are factors outside of the Company’s control regarding review timelines.

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TUS I-11

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

PPL Electric Response

In load interconnection applications under 69kV, the primary sources of customer-induced delays include (1) inaccuracies in load data, (2) incomplete descriptions of the requested load, and (3) inadequate or missing supporting documentation.

First, applications frequently contain errors in unit usage within the load request section, such as using watts instead of kilowatts, substituting amperes where kilowatts are required, or confusing horsepower with watts. These inconsistencies create inaccuracies that require clarification before PPL Electric's review can proceed.

Second, applicants often fail to break down the requested load into required categories (e.g., lighting, motors, air conditioning), instead providing a single aggregate value. This lack of detail limits the Company's ability to assess load characteristics and may necessitate follow-up and resubmission.

Third, applications are sometimes missing key service information, including the desired service voltage and requested amperage, which are necessary to evaluate system requirements.

For load interconnection applications at 69kV or higher, the most common causes of delay in reviews are (1) incomplete project definition, (2) insufficient technical information, and (3) lack of demonstrated project readiness.

Applications often omit or revise key load details, including total MW, phasing, and load ramp schedule, which are necessary for accurate transmission planning and may require re-study. In addition, applicants frequently fail to provide essential electrical data, such as ramp rate, power factor, reactive power

requirements, major equipment characteristics, and complete one-line diagrams which may prevent the Company from performing required system analyses.

Delays also arise where the project's location or point of interconnection is not clearly defined, or where application materials contain inconsistent information. Finally, a lack of demonstrated project readiness, including delays in providing required authorizations or evidence of project advancement, can impede the Company's ability to proceed with engineering and procurement.

VERIFICATION

I, KIMBERLY GAUNTNER, being the Sr. Mgr. TD Interconnect Affairs at PPL Services Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation 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: 05/08/2026

Kimberly W Gauntner

Kimberly Gauntner