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June 1, 2026

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

Re: Interconnection and Tariffs for Large Load Customers; Docket No. M-2025-3054271

Dear Secretary Homsher:

Enclosed for filing is the Petition of the Energy Association of Pennsylvania, pursuant to 52 Pa. Code § 1.82(a), for Leave to Withdraw its May 27, 2026 Petition for Reconsideration or Clarification pursuant to 52 Pa. Code § 5.572 of the Commission's Final Order entered on May 12, 2026, at Docket No. M-2025-3054271

Sincerely,

Danielle Jouenne

Danielle Jouenne
Vice President and General Counsel

Enclosure

cc via email: COS

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Interconnection and Tariffs for Large :
Load Customers : Docket No. M-2025-3054271

**PETITION OF THE ENERGY ASSOCIATION OF PENNSYLVANIA FOR
LEAVE TO WITHDRAW ITS PETITION FOR
RECONSIDERATION OR CLARIFICATION**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

The Energy Association of Pennsylvania (“EAP”)¹ hereby petitions the Pennsylvania Public Utility Commission (“Commission”) pursuant to 52 Pa. Code § 1.82(a) for leave to withdraw its May 27, 2026 Petition for Reconsideration or Clarification (“Petition”) of the Commission’s Final Order entered on May 12, 2026, at Docket No. M-2025-3054271 (“Order”).²

I. INTRODUCTION

1. On November 6, 2025, the Commission issued its Tentative Order setting forth a proposed model tariff for Large Load Customers and inviting interested parties to submit Comments.

¹ EAP’s members include: Citizens’ Electric Company; Columbia Gas of Pennsylvania, Inc.; Duquesne Light Company; FirstEnergy Pennsylvania Electric Company; Leatherstocking Gas Company, LLC; National Fuel Gas Distribution Corp.; PECO Energy Company; Peoples Natural Gas Company LLC; Philadelphia Gas Works; Pike County Light & Power Company; PPL Electric Utilities Corporation; UGI Utilities, Inc.; Valley Energy, Inc.; and Wellsboro Electric Company. PPL Electric did **not** join in the Petition for Reconsideration or Clarification that was filed by EAP.

² EAP and its members herewith reserve their rights to prosecute all of their federal claims in a Federal District Court of Pennsylvania, including but not limited to all claims pursuant to the Federal Power Act, Section 1983 of the Civil Rights Act, the Commerce Clause of the United States Constitution, the Supremacy Clause of the United States Constitution, the Fourteenth Amendment of the United States Constitution, and all similar claims including all claims for damages thereunder, according to the rule of *England v. La. State Bd. of Med. Exam'rs*, 375 U.S. 411 (1964).

2. Comments were filed by many interested parties, as noted on pages 3-5 of the Order.

3. On May 12, 2026, the Commission entered its Order issuing its Model Tariff.

4. On May 27, 2026, the EAP filed its Petition.³

II. EAP'S PETITION FOR LEAVE TO WITHDRAW SHOULD BE GRANTED

5. EAP respectfully requests that the Commission grant leave for EAP to withdraw its Petition.

6. After filing the Petition, EAP determined that it would be appropriate to withdraw its Petition.

7. Section 1.82(a) of the Commission's regulations provides that "[a] party that desires to terminate an uncontested matter or proceeding before final decision by the Commission or otherwise desires to withdraw a submittal or pleading, shall file a petition for leave to withdraw the appropriate document." 52 Pa. Code § 1.82(a).

8. "If no party objects to the petition within 10 days of service, the matter may be stricken by the Commission or by the presiding officer." *Id.*

9. When evaluating such petitions for leave to withdraw, the Commission has considered whether there would be an "adverse impact based on the withdrawal" and whether the "public interest" requires the continuation of the proceeding. *PECO Energy Co.'s 20216-2018 Univ. Serv. and Energy Conservation Plan*, 2022 Pa. PUC LEXIS 50, at *4 (Order entered Feb. 3, 2022).

10. Here, EAP's withdrawal of the Petition would not create an adverse impact

³ As noted in footnote 1, *supra*, PPL Electric did **not** join in the Petition.

11. No party has filed an Answer to the Petition, nor has the Commission even granted reconsideration pending further review of the merits to toll the 30-day review period.

12. Also, the public interest does not require the continuation of the proceeding, because EAP has reserved its and its members' rights to pursue their arguments and claims in other proceedings.

13. For these reasons, EAP respectfully requests that the Commission grant EAP leave to withdraw its Petition.

III. CONCLUSION

WHEREFORE, the Pennsylvania Public Utility Commission should grant the Energy Association of Pennsylvania's Petition for Leave to Withdraw its Petition for Reconsideration or Clarification.

Respectfully submitted,

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Dated: June 1, 2026

*Counsel for Energy Association of
Pennsylvania*

VERIFICATION

I, Andrew S. Tubbs, President and Chief Executive Officer of the Energy Association of Pennsylvania, 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 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: June 1, 2026


Andrew S. Tubbs

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this filing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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