



June 8, 2026

VIA E-File

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

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

Petition of the Energy Association of Pennsylvania for Reconsideration or Clarification
Letter in Lieu of Answer

Dear Secretary Homsher:

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) and the Tenant Union Representative Network (TURN) submit this letter in lieu of a formal Answer to the Petition of the Energy Association of Pennsylvania (EAP) for Reconsideration or Clarification (Petition for Reconsideration) in the above captioned proceeding.

On Wednesday, May 27, 2026, EAP filed the instant Petition for Reconsideration pursuant to 52 Pa. Code § 5.572, seeking reconsideration or clarification of the Commission's May 12, 2026 Final Order issuing its model tariff for Large Load Customers (Model Tariff).

On Monday, June 1, 2026, EAP filed a Petition for Leave to Withdraw its Petition (Petition to Withdraw). In requesting leave to withdraw, EAP notes: "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." (Petition to Withdraw at 3, para. 11).

On Thursday, June 4, 2026, the Commission issued an Opinion and Order tolling the period for appeal and preserving its jurisdiction to review EAP's Petition for Reconsideration.

CAUSE-PA and TURN are strongly opposed to the jurisdictional averments raised in EAP's Petition for Reconsideration and specifically deny the legal and policy arguments advanced therein which suggest that the Commission does not have jurisdiction to assign costs in the manner described in the Model Tariff. We submit that the Commission has clear jurisdictional authority to establish the policy guidance adopted in its Model Tariff in order to shield consumers from rising energy costs associated with the introduction of Large Load Customers onto the grid.

Furthermore, we submit that the Commission also has the corresponding jurisdictional authority to ensure adoption of the Model Tariff's provisions in electric distribution company tariffs.

Nevertheless, and notwithstanding our strong opposition to EAP's Petition for Reconsideration, CAUSE-PA and TURN are not opposed to EAP's Petition to Withdraw. Granting EAP's Petition to Withdraw will avoid the time and expense associated with unnecessarily affirming the Commission's jurisdiction over tariff provisions applicable to Large Load Customers.

The timing of the Commission's tolling order has raised some uncertainty as to whether interested parties must still file a substantive Answer to EAP's Petition for Reconsideration on or before June 8 to preserve their rights in the event the Commission does not grant EAP's Petition to Withdraw.

In issuing a tolling order *after* EAP filed its Petition to Withdraw, CAUSE-PA and TURN do not believe it is likely that the Commission intended to require interested parties to file a substantive Answer to EAP's Petition for Reconsideration. However, if the Commission is nevertheless inclined to deny EAP's Petition to Withdraw, we submit that the Commission must establish a new deadline by which interested parties may file a formal Answer.

For these reasons, CAUSE-PA and TURN respectfully request that the Commission grant EAP's Petition to Withdraw. In the alternative, if the Commission were to deny EAP's Petition to Withdraw, we urge the Commission to establish a new deadline for parties to file substantive Answers to EAP's Petition for Reconsideration.

Respectfully submitted,

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

Certificate of Service

I hereby certify that I have this day served copies of the **Letter in Lieu of Answer of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) and the Tenant Union Representative Network (TURN)** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email

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