July 6, 2026

**VIA ELECTRONIC FILING**

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

**Re: Potential Regulations for Interconnecting Electric Loads; Docket No. L-2025-3059032 - Comments of Centennial Development LLC**

Dear Secretary Homsher:

Enclosed for filing in the above-referenced docket please find the Comments of Centennial Development LLC, submitted in response to the Commission's Secretarial Letter published in the Pennsylvania Bulletin on July 4, 2026, at 56 Pa.B. 3865.

Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

/s/ David John Frenkil

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Enclosure

**BEFORE THE**
**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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| Potential Regulations for | : | |
| Interconnecting Electric Loads | : | Docket No. L-2025-3059032 |
| | : | |

**COMMENTS OF CENTENNIAL DEVELOPMENT LLC**

## I. INTRODUCTION

On July 4, 2026, the Pennsylvania Public Utility Commission ("Commission") published a Secretarial Letter in the Pennsylvania Bulletin at 56 Pa.B. 3865, seeking comments from all interested parties regarding the possibility of promulgating regulations for interconnecting electric loads, including large loads, at Docket No. L-2025-3059032 (the "Secretarial Letter"). The Secretarial Letter poses sixteen questions concerning the interconnection of electric loads by Pennsylvania electric distribution companies ("EDCs") and directs that comments be submitted within twenty calendar days of publication. Centennial Development LLC ("Centennial") respectfully submits these timely comments.

These comments address the questions implicating coordination between load interconnection and distributed generation - Questions 1, 3, 4, 5, 8, 9, and 11 through 16.

## II. IDENTITY AND INTEREST OF CENTENNIAL

Centennial is an energy company focused on developing, financing, owning, and operating solar and battery energy storage projects at commercial and industrial properties. Centennial's power projects deliver four core benefits: lower power costs for homes and businesses; increased net operating income for property owners; new megawatt-scale generation that is deployed in a matter of months and strengthens the long-term power supply in the communities where its projects are located; and reduced greenhouse gas emissions.

Centennial's portfolio of operational and contracted assets represents more than $350 million in capital investment and spans both on-site and front-of-the-meter projects. Centennial's customers include Fortune 500 companies, publicly traded REITs, and a broad range of commercial and industrial property owners. Centennial develops, owns, and operates projects in Pennsylvania and regularly participates in EDC interconnection processes; the questions presented in the Secretarial Letter therefore bear directly on Centennial's Pennsylvania portfolio.

## III. RESPONSES TO THE COMMISSION'S QUESTIONS

### A. Question 1

*What electric load interconnection issues should be addressed via regulation? Please list the specific issues and how a regulation would be beneficial.*

Four issues warrant regulatory treatment. First, the absence of any coordinated process for load paired with on-site generation or storage. Today, co-located projects face sequential, duplicative reviews under separate frameworks, even though generation sized to serve on-site load reduces the very system impacts a load study is measuring. Regulation should require EDCs to study co-located load and generation as a single net demand profile.

Second, the absence of uniform, binding review timelines, which produces materially different outcomes across service territories for identical projects.

Third, limited transparency: applicants have no standardized visibility into queue position, study status, or available feeder and substation capacity.

Fourth, mid-review changes to EDC procedures and technical requirements that extend or restart reviews of pending applications.

Regulation is beneficial because it replaces territory-by-territory discretion with predictable, uniform rules. Predictability lowers financing costs and accelerates energization, and

explicit crediting of co-located generation reduces the distribution and transmission upgrades that are otherwise socialized to all ratepayers.

**B. Question 3**

*Should load interconnection requests have different review levels based on load size, similar to generation interconnection review levels? If yes, please provide the load size range for each level of review and the rationale for these levels.*

Yes. A tiered structure modeled on the Commission's generation interconnection review framework at 52 Pa. Code Chapter 75 is appropriate. Illustratively: Level 1 for loads up to 1 MW (screening review only); Level 2 for loads of 1-5 MW; Level 3 for loads of 5–25 MW (system impact study); and Level 4 above 25 MW (full study with transmission-level and PJM coordination). The rationale is proportionality - review burden should scale with system impact - and structural symmetry with the generation framework, which makes coordinated review of co-located load and generation administratively straightforward because both sides of a single project map to comparable review tiers.

**C. Question 4**

*If there is generation collocated with the load, should there be an expedited process for the generation to be interconnected at the same time the load is interconnected?*

Yes, unequivocally. Where generation is co-located with new load, the EDC should conduct a single, parallel review that concludes no later than the load review and evaluates the combined facility's net demand rather than studying each element in isolation. Specifically:

- Generation and storage sized to serve on-site load reduce the incremental system impact of the load itself. A combined net-load study avoids overstating upgrade requirements and costs.

- An expedited co-location pathway gives large-load applicants a genuine incentive to bring their own generation, which mitigates regional capacity constraints and reduces network upgrades that would otherwise be borne by other ratepayers.
- Non-export and export-limited configurations using certified power control systems should qualify for expedited screens rather than full study.
- ***Energy storage should be evaluated on its operating profile and charging controls, not nameplate capacity.***
- An applicant that amends a pending load application to add co-located generation should retain its queue position, and the amendment should not restart the load review where net demand does not increase.

**D. Question 5**

> *Some electric distribution companies (EDCs) provide online portals for the interconnection of distributed energy resources. Should the same be provided for load-interconnecting applicants to submit all applications and supporting documents? Please list the benefits or drawbacks.*

Yes. EDCs already operate online portals for distributed energy resource interconnection; extending equivalent functionality to load applications is an incremental step. The benefits are standardized intake and automated completeness checking, fewer deficiency cycles, real-time status visibility, a documented application record, and electronic payment. The Commission should further require that the load and DER portals be unified or interoperable, so a co-located project files once and both reviews reference a common record. The principal drawback - implementation cost - is modest relative to the administrative savings and is an appropriate recoverable expense.

**E. Question 8**

*Should projects be able to move ahead of other projects in the queue based on completion of certain milestones? If so, please offer the criteria and conditions that should be considered and any that should not be a determining factor.*

Yes. A readiness-based ("first-ready, first-served") framework is superior to strict first-come, first-served because it prevents speculative applications from pacing the queue for viable projects. Appropriate advancement criteria include: demonstrated site control; land development and zoning approvals; executed service or facility agreements; posted financial security; and binding equipment procurement or construction commitments. In addition, a binding commitment to co-located generation, storage, or enforceable load flexibility that reduces the project's coincident peak impact should qualify as an advancement criterion, because it directly reduces or eliminates the system upgrades that pace the queue for every project behind it.

Factors that should not determine advancement: applicant size or identity, affiliation with the EDC, or willingness to pay premium fees untethered to cost - a pay-to-play dynamic that would systematically disadvantage independent developers.

**F. Question 9**

*What if any protocols should be in place for circumstances where an applicant can jump ahead in the queue?*

Advancement should occur only under pre-published, objective criteria applied uniformly across applicants; with written notice to affected lower-queued applicants; subject to a no-harm test, meaning advancement may not materially delay other queued projects or shift upgrade costs onto them; documented in writing in each instance; and reviewable through an expedited Commission dispute process.

**G. Question 11**

*Once a load interconnection request is submitted, what information should the EDC provide to the applicant, and by what means and frequency? Examples may*

*include queue position, status of load study, anticipated timeline for completion, etc.*

At submission: written confirmation of receipt, queue number and position, assigned review level, a single point of contact, the applicable fee schedule, and estimated milestone dates. During review: a portal dashboard updated at least monthly showing queue position, study status, pending data requests, estimated completion dates, and identified constraints with preliminary upgrade scope and cost ranges as they develop. Material changes - study delays, revised technical requirements, or events affecting the timeline - should be affirmatively noticed to the applicant within five business days rather than discovered by the applicant.

## H. Question 12

*Should there be prescribed timelines and timeframes for completing the various steps in the load interconnection application review process? If so: (a) Please provide a list of steps in the process and a reasonable time to complete each step. Please include various studies that may be required as part of the review process. (b) What is a reasonable timeframe to complete a load interconnection application review? (c) What timeline should exist for EDCs to complete the review of collocated load and generation requests, if any? (d) If an EDC exceeds its expected review timeline, what actions should the EDC be required to take?*

Yes. Timelines without consequences are aspirational, so both are needed.

**(a) Illustrative steps and durations.** Completeness and deficiency review, 10 business days; scoping meeting, within 15 business days of a complete application; feasibility screening, 30 days; system impact study, 60-90 days depending on review level; facilities study, 60 days; tender of the interconnection or service agreement, 15 business days after the final study.

**(b)** Lower-tier loads should complete review within 90 days of a complete application; large or complex loads within 180 days. No application should exceed 12 months absent documented, project-specific cause.

**(c)** Co-located load and generation should be studied in parallel on a unified schedule no longer than the load review standing alone. Collocation should never extend the timeline, and the

generation authorization should never lag the load authorization - otherwise the expedited pathway addressed in Question 4 is illusory.

**(d)** Before a deadline passes, the EDC should provide written notice stating the specific reason and a revised completion date. Overdue applications should be escalated to a designated EDC officer and reported to Commission staff on a standing basis; study fees attributable to EDC delay should be tolled or refunded; and the applicant should have the option to elect a qualified third-party consultant, from an EDC-approved list, to complete outstanding studies at the applicant's election.

## I. Question 13

*Should there be separate queues for both generation and load interconnection requests? Why or why not?*

Yes. Separate queues with dedicated study resources ensure that a surge of large-load requests does not displace or delay generation interconnection reviews - including the review timelines on which distributed generation projects depend under Chapter 75 - and vice versa. Separation, however, requires a coordination mechanism for co-located projects: a co-located request should hold a single, synchronized position across both queues, with cross-referenced applications and one combined net-impact study, so that neither queue strands the other half of the same project.

## J. Question 14

*How should the Commission address situations where there are exigent circumstances delaying a project's review or approval to interconnect from proceeding? Examples of these circumstances may include unexpected developments, need for additional studies, changing guidelines, etc.*

Five principles should govern. First, an application should be governed by the rules, technical requirements, and study methodologies in effect on its submission date; subsequent changes to guidelines apply prospectively and never restart a pending review. Second, any

additional study must be justified in writing with a specific engineering basis, narrowly scoped, and assigned its own deadline. Third, delay attributable to the EDC should toll the applicant's obligations and preserve its queue position and any capacity allocation. Fourth, genuine force majeure events should trigger prompt notice, a duty to mitigate, and a resumed schedule - not open-ended suspension. Fifth, disputes over delay should be channeled to an expedited Commission resolution process rather than left to attrition.

## K. Question 15

> *Should EDCs be required to provide hosting capacity maps? (a) If yes, what are the benefits, if any, of requiring EDCs to develop hosting capacity maps containing EDC feeder data and locations for substations, distribution transformers, line voltage, and related distribution assets? (b) What are the concerns regarding this requirement, if any? (c) What aspects should be considered for these hosting capacity maps? Examples may include the frequency of updates, transparency, filtering and toggling mechanisms, size and number of applications for a certain location, identified system constraints, complaint process, etc.*
>
> Yes, EDCs should be required to provide them.

**(a) Benefits.** Applicants - for load and generation alike - can site projects where capacity actually exists, which reduces infeasible and speculative applications, shortens study cycles, lowers upgrade costs, and improves utilization of existing distribution assets. The maps are particularly valuable for collocation decisions, allowing generation to be paired with load on feeders capable of supporting both. Publication also corrects a basic information asymmetry: today the EDC is the only party that knows where capacity exists on its system.

**(b) Concerns.** Three, each manageable: stale data (addressed by mandated refresh frequency and date-stamping); over-broad security or CEII withholding (addressed through aggregation and access controls rather than non-publication); and accuracy disclaimers so sweeping that the data becomes unusable (addressed through minimum data standards and a correction process).

**(c) Aspects to consider.** Refresh at least quarterly, preferably monthly; feeder- and substation-level granularity including line voltage and distribution transformer capacity; presentation of both DER hosting capacity and available load-serving capacity on a single platform; an overlay of queued applications by circuit, showing count and aggregate MW; machine-readable and GIS-compatible downloads; identification of known constraints and planned upgrades; documented methodology; filtering and toggling functionality; and a defined process for flagging suspected errors and filing complaints.

## L. Question 16

> *Should EDCs be required to publish a public list of projects in an EDC's load interconnection queue? (a) What are the benefits, if any, of requiring EDCs to post on its website a list of projects in its load interconnection queue that includes the project's queue position, nameplate capacity, and circuit identifier in a manner that protects the identity of the project owner and the location of the project? (b) What are the concerns regarding this requirement, if any? (c) What aspects should be considered for these public lists of projects? Examples may include timing for updates, transparency, filtering and toggling mechanisms, complaint process, etc.*
>
> Yes.

**(a) Benefits.** Prospective applicants can gauge congestion on a circuit before filing, which by itself deters duplicative and speculative applications. Developers of generation and storage can identify circuits with pending large loads, facilitating collocation arrangements that reduce net system impact. Publication also creates accountability for EDC processing performance, consistent with the transparency that already governs generation queues at the RTO level.

**(b) Concerns.** Confidentiality is adequately addressed by the structure the question describes - publishing queue position, capacity, and circuit identifier while withholding owner identity and precise location. No further withholding is warranted.

**(c) Aspects to consider.** Monthly updates; inclusion of application date, review level, study stage, current status, and requested capacity; retention of withdrawn projects in an archive

so attrition rates are visible; filtering by substation, circuit, and status; machine-readable format; and a correction and complaint process.

## IV. CONCLUSION

Centennial appreciates the Commission's attention to the interconnection of electric loads and the opportunity to submit these comments. For the reasons set forth above, Centennial respectfully requests that the Commission proceed to a rulemaking that: (i) requires co-located load and generation to be studied as a single net demand profile on a unified schedule; (ii) establishes tiered review levels with binding timelines and meaningful remedies for delay; (iii) mandates transparency through online portals, hosting capacity maps, and public queue reporting; and (iv) adopts objective, readiness-based queue management protocols. Centennial welcomes the opportunity to participate in any subsequent phase of this proceeding.

Respectfully submitted,

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Dated: July 6, 2026