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July 9th, 2026

L-2025-3059032

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

Re: Comments of the Borough of Kulpmont; Potential Regulations for Interconnecting Electric Loads; Docket No. L-2025-3059032

Dear Secretary Homsher:

The Borough of Kulpmont respectfully submits these comments in response to the Commission's Secretarial Letter of June 22, 2026, which seeks comments on the possibility of promulgating regulations for the interconnection of electric loads.

The Borough comments from direct experience. Kulpmont has pursued two small municipal solar projects, Work Order 13904396 at 200 kilowatts and Work Order 13929883 at 500 kilowatts, both seeking to interconnect at PPL Electric's EXCHANGE 08-01 substation. In the Interconnection Impact Reviews that PPL issued on September 18, 2025, most of the estimated cost was attributed to a substation reverse power flow reinforcement exceeding one million dollars for these modest projects.

In deciding how to proceed, the Borough found that basic information was difficult to obtain. The Borough could not readily determine the status of the interconnection queue at the substation, which projects sat ahead of its own and at what sizes, the substation minimum load PPL used in its analysis, or whether the reinforcement would still be required if other queued projects did not advance and the Borough's two projects, on their own, remained below that minimum load. This experience informs the comments that follow and illustrates why queue transparency, accessible hosting capacity data, and clear cost responsibility matter to small applicants and to municipalities operating on limited budgets.

The Borough is not addressing every question in the Commission's list. It is responding only to the questions that bear on its own experience and defers to other parties on matters outside that experience. The Borough's responses to the questions most relevant to its experience follow below.

The Borough appreciates the Commission's attention to load interconnection and welcomes the opportunity to contribute. Please direct any questions to the undersigned.

Sincerely,

Stephen Motyka
Councilman, Borough of Kulpmont
570-590-4167
motyka_s@yahoo.com

Responses to the Commission's Questions

[The Borough's responses to the relevant questions will be inserted here.]

- 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.

Answer: Yes. Project readiness should affect queue position for load and generation advancing projects that are genuinely ready to proceed. Two conditions should govern any such advancement: full transparency of the advancing project's details and beneficiaries, and explicit consideration of the administrative burden the capability places on the utility.

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

Answer: Transparency is the governing protocol. A project that seeks to move ahead of others must accept that more project specific detail will be shared with affected parties who may have an interest in, or objection to, the advancement. The trade for priority is disclosure.

- 15) Should EDCs be required to provide hosting capacity maps?

Answer: Yes. Interconnection begins with publicly available data, and utility maps should do everything possible to enable the process rather than forcing applicants to guess and check, as the current process does.

- 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?

Answer: It will save time, money, reduce disputes for all parties, and increase the quality of all application types. We also believe this will reduce the overall number of applications since guess and check approaches will not be needed.

- b) What are the concerns regarding this requirement, if any?

Answer: The principal concern is that granular data can re-identify and geolocate sensitive loads. This should be addressed with controls rather than refusal. The public tier should carry feeder level aggregates only, with no customer identifiable information, while granular hourly load and protection data sits in higher tiers under standard agreements. A load shape re-identification screen and the California 15/15 suppression rule protect critical end users such as hospitals, water treatment plants, and data centers. No federal authority, including CEII, PCII, or NERC CIP-014, prohibits controlled disclosure of distribution data; these are protection regimes rather than non-disclosure bars, and CIP-014 reaches only high voltage transmission.

- 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.

Answer: Available data sufficient to allow third parties to generally determine if an application is reasonably likely to advance without significant cost or delay due to preexisting system constraints or queue position. Key design aspects include tiered access, at least quarterly refresh with an “as of” date, filtering and toggling by substation, feeder, size, status, minimum load, transformer size, and system readiness machine readable exports, clearly identified system constraints, and a portal-based complaint process.

16) Should EDCs be required to publish a public list of projects in an EDC’s load interconnection queue?

Answer: Yes, with tiered disclosure. A public list proves the queue is real and fairly ordered without handing an adversary a targeting map, provided granular detail sits behind the gated tier. This will also contribute to transparency requirements needed for queue projects that jump position based on readiness

- 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?

Answer: Publishing queue position, nameplate capacity, and circuit identifier lets developers see where capacity is saturated, which will save time and money, and increase the overall quality of applications. A visible ordering also deters favoritism and validates that any milestone-based advancement as legitimate.

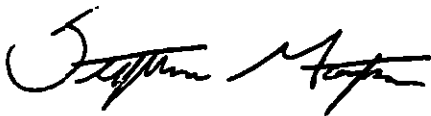
- b) What are the concerns regarding this requirement, if any?

Answer: Combining nameplate capacity with a circuit identifier can re-identify and geolocate a single large load even when the owner name is withheld, which recreates the adversary targeting risk. Anonymized data is not truly anonymous when a circuit carries only one obvious large project. However, we note that there are several alternative sources and or means of collecting geolocating single project data and making connections. Limiting stakeholder access through the utility system is largely hurting progress and costing money.

- 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.

Answer: Key design aspects include tiered access, with aggregated data public and granular detail gated; a small number suppression threshold that generalizes the circuit identifier when a circuit carries few projects; a coarser geographic disclosure for critical infrastructure loads; automated and frequent portal updates; filtering by circuit, size, and status; and a portal-based complaint process.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Motyka". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Stephen Motyka
Councilman
Borough of Kulpmont



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE
REFER TO OUR FILE

June 22, 2026

TO ALL INTERESTED PARTIES:

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

The Pennsylvania Public Utility Commission (Commission) issues this ~~letter seeking~~ comments from all interested parties regarding the possibility of promulgating regulations for interconnecting electric loads, including large loads. Specifically, the Commission seeks comments on the attached list of questions and any other topics that interested parties believe should be included in potential regulations on the interconnection of electric loads.

Comments referencing Docket No. L-2025-3059032 shall be submitted to the Public Utility Commission, Attn: Secretary, Commonwealth Keystone Building, 2nd Floor, 400 North Street, Harrisburg, PA 17120 within twenty (20) calendar days from the date of publication of this Secretarial letter in the *Pennsylvania Bulletin*.

Any questions regarding this letter should be directed to Darren D. Gill, Deputy Director, Bureau of Technical Utility Services at 717-783-5244 or dgill@pa.gov.

Sincerely,

Matthew L. Homsher
Secretary