



July 21, 2026

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

Re: Comments of GreenSpark Solar – Potential Regulations for Interconnecting Electric Loads, Including Large Loads, Docket No. L-2025-3059032

Dear Secretary Homsher:

GreenSpark Solar respectfully submits these comments in response to the Pennsylvania Public Utility Commission's proceeding on potential regulations for interconnecting electric loads, including large loads. GreenSpark brings substantial industry experience as a nation-leading distributed solar and energy storage installer, developer, and operator, with direct experience navigating interconnection, utility review, project construction, and distributed energy deployment in markets where clear rules, transparent queues, and predictable review processes are essential to successful project development.

GreenSpark appreciates the Commission's attention to modernizing Pennsylvania's load interconnection framework. As distributed solar, battery storage, flexible load controls, microgrids, and non-exporting generation become increasingly important to customers and the grid, interconnection processes should reflect how these resources actually operate, using accurate project-specific data rather than separate, static assumptions about load and generation.

These comments emphasize several reforms that would produce immediate benefits for applicants, utilities, and Pennsylvania customers: a clear process for combined review of co-located load and generation; greater transparency into system conditions, queue activity, study assumptions, and upgrade cost drivers; enforceable utility review timelines; standardized online application processes; robust public hosting capacity information; and cost certainty protections that allow development to proceed with confidence.

The recommendations outlined in these comments reflect proven best practices from interconnection reforms adopted in other states, where standardized processes, greater transparency, and clearer cost protections have helped support all stakeholders. These approaches reduce unnecessary upgrade costs, improve project siting decisions, limit avoidable restudies, increase queue efficiency, and support more dynamic grid and energy

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systems while providing the certainty needed for continued investment in distributed energy resources and grid-supportive electrification.

Thank you for the opportunity to provide comments. GreenSpark looks forward to continued engagement with the Commission and stakeholders as Pennsylvania considers reforms that can improve interconnection outcomes for customers, utilities, and the distributed energy industry.

Respectfully submitted,

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Responses to PUC electric load interconnection questions

Question 1. What electric load interconnection issues should be addressed via regulation? Please list the specific issues and how a regulation would be beneficial.

GreenSpark Response to Question 1:

The ability for developers and utilities to review load and generation sources in a combined study would be greatly beneficial. Studying load and generation separately can overstate a project's actual impact on the distribution system because each study may assume the most conservative operating scenario without recognizing how the resources are designed to work together.

This is especially important for projects that include load management systems, microgrids, flexible load controls, battery storage, or non-exporting generation. These technologies can reduce peak demand, manage grid impacts, and support more efficient use of existing distribution infrastructure when they are evaluated based on their actual operating profile.

A combined study process would create a more accurate and practical interconnection framework, reduce unnecessary upgrade costs, and help avoid delays that could discourage investment in new businesses, housing developments, distributed energy resources, and electrification. By recognizing flexible load and generation as grid-supportive tools, Pennsylvania can improve interconnection outcomes while supporting economic development and lowering long-term energy costs for all ratepayers.

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Question 2. Should regulations concerning load interconnection be formulated and applicable by customer class, interconnection voltage or tariff rate?

GreenSpark Response to Question 2:

Policies encouraging new load customers, with generation and flexible loads, should be applied broadly and without restrictions related to rate class or interconnection voltage.

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.

GreenSpark Response to Question 3:

No Response

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?

GreenSpark Response to Question 4:

We believe the expedited process should be employed for generation that is paired with a load and designed to not export power to the grid. This would encourage the use of batteries and other technologies to provide peak-shaving and avoid interconnection barriers.

Question 5. Some electric distribution companies 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.

GreenSpark Response to Question 5:

Portals that work well tend to help the process because it can make it clearer what the requirements of the submittal are and better track documents that have been uploaded. Additional benefits would apply if there is an intention to merge the application processes, especially for projects with both load and generation.

Question 6. What are some methods that may be used to discourage applicants from submitting duplicative projects with different electric distribution companies?

GreenSpark Response to Question 6:

No response

Question 7. In order to establish a position in the electric distribution company's queue, would requiring a load interconnection applicant to pay a fee, based on the level of review, be effective in minimizing duplicative projects with different electric distribution companies?

GreenSpark Response to Question 7:

No response

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.

GreenSpark Response to Question 8:

GreenSpark does not support allowing projects to move ahead of other projects in the interconnection queue based solely on milestone completion. While GreenSpark supports efforts to improve queue efficiency and ensure that only viable projects remain active in the interconnection process, queue jumping can undermine study assumptions, create cost allocation uncertainty, and reduce the predictability needed for project development and investment.

Interconnection studies are conducted based on the specific mix and order of projects in the queue at a given point in time. If projects are permitted to change positions after studies are completed, the assumptions underlying those studies may no longer be valid. This could affect upgrade determinations, cost allocations, and project timelines, potentially requiring additional studies and creating uncertainty around a project's ultimate interconnection costs. Such uncertainty can be particularly challenging for developers seeking financing and making investment decisions.

Queue reordering could also create complications regarding responsibility for upgrades. If a project advances ahead of another project that was originally assigned upgrade obligations, it may be unclear whether those costs should shift to the advancing project or whether the project must wait for previously identified upgrades to be completed. In either case, the expected benefits of advancing in the queue may be limited.

More broadly, increased uncertainty in queue position and study assumptions may encourage utilities to adopt more conservative planning and impact assessment practices, which could inadvertently reduce opportunities for distributed renewable energy deployment.

Rather than allowing projects to change queue position, Pennsylvania should prioritize clear and enforceable utility timelines, milestone requirements, and study completion deadlines.

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A predictable and transparent interconnection process is likely to be more effective in reducing queue delays while preserving the regulatory certainty and cost certainty needed to support project development and investment.

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

GreenSpark Response to Question 9:

GreenSpark strongly discourages the Commission from creating a broad queue-jumping framework. More mature distributed energy markets have generally moved toward standardized, transparent, and enforceable interconnection processes because ad hoc queue movement can create significant administrative complexity, undermine study assumptions, and reduce the cost certainty needed for development to continue. Allowing applicants to move ahead of other projects may appear to address near-term delays, but in practice it can create a more cumbersome process by requiring utilities to restudy affected projects, reallocate upgrade costs, reassess timelines, and determine which applicants should bear the consequences of queue changes.

If the Commission allows any exception to queue order, it should be narrowly defined and accompanied by clear protections for all affected applicants. At minimum, the advancing project should be required to pay for any incremental studies, restudies, or upgrades caused by its advancement. Projects that are bypassed should retain cost certainty protection and should not be assigned higher upgrade costs, delayed timelines, or new obligations as a result of another applicant moving ahead. Utility studies should clearly identify the facilities, costs, and timing impacts associated with any queue movement before the change is approved.

A more durable policy approach would be to reduce the circumstances that make queue reordering necessary. Pennsylvania can support this goal by establishing standardized application requirements, clear study timelines, transparent queue reporting, hosting capacity information, and well-defined rules for project milestones and withdrawals. These process improvements are more likely to support a durable market because they reduce uncertainty for utilities, applicants, financiers, and customers while preserving the cost certainty necessary for distributed energy development.

Question 10. For load interconnection applications, should electric distribution companies charge an application fee? If yes, address: minimum threshold and scaling by load size; accepted payment methods; electronic payments without administration fees; alignment between processing costs and fee structure; and oversight to avoid arbitrary fees.

GreenSpark Response to Question 10:

No response

Question 11. Once a load interconnection request is submitted, what information should the electric distribution company provide to the applicant, and by what means and frequency? Examples may include queue position, status of load study, anticipated timeline for completion, etc.

GreenSpark Response to Question 11:

All those examples make sense for information to provide.

Question 12. Should there be prescribed timelines and timeframes for completing the various steps in the load interconnection application review process? If so, address process steps and reasonable completion times, studies that may be required, overall review timeframe, review timeline for collocated load and generation requests, and required actions if an electric distribution company exceeds its expected review timeline.

GreenSpark Response to Question 12:

Yes. Pennsylvania should establish clear, enforceable timelines for each stage of the interconnection review process. Predictable review timelines are essential for maintaining an efficient queue and providing developers, customers, and utilities with the certainty needed to make informed investment and project development decisions.

Delays in reviewing one application can have cascading impacts on subsequent projects in the queue, slowing deployment of new generation and increasing overall system costs. Timely studies and application reviews are therefore critical not only for individual projects but for overall queue efficiency.

While certain project types, such as co-located load and generation facilities, may require more complex analysis than standalone generation or load interconnections, any extended review periods should be clearly defined and limited. Applicants should understand at the outset the expected study process, review milestones, and decision timelines applicable to their projects.

Meaningful accountability measures should accompany any prescribed timelines. If a utility exceeds established review deadlines, the Commission should require corrective actions such as expedited processing, enhanced reporting, or other mechanisms that improve transparency and ensure that queue delays do not persist indefinitely.

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A transparent, timely, and predictable review process will encourage investment, reduce uncertainty for developers and customers, and support the efficient expansion of Pennsylvania's electric infrastructure and distributed energy resources.

Question 13. Should there be separate queues for both generation and load interconnection requests? Why or why not?

GreenSpark Response to Question 13:

GreenSpark strongly supports a coordinated interconnection process that evaluates generation and load together where both are part of the same project or are otherwise operationally related. Maintaining a unified process, or at minimum requiring a combined load and generation study, provides important benefits for utilities, applicants, and customers. When load and generation are reviewed separately, each study may rely on conservative assumptions that do not reflect how the project will actually operate. A combined review allows the utility to evaluate the project's real operating profile, including whether on-site generation, battery storage, or flexible load controls will reduce peak demand, limit export, or otherwise mitigate distribution system impacts.

This approach can produce more accurate study results, reduce unnecessary upgrade costs, and improve the efficient use of existing distribution infrastructure. It can also help utilities better understand the net impact of a project on the grid, support more informed planning decisions, and reduce the risk of duplicative or conflicting study outcomes. For applicants and customers, a combined process provides greater predictability, clearer timelines, and better cost certainty, all of which are necessary to support continued investment in distributed energy resources and grid-supportive electrification.

At minimum, Pennsylvania should establish a clear process for combined load and generation studies where projects include co-located or operationally related resources. This would better reflect how modern energy projects are designed and operated while supporting a more transparent, efficient, and practical interconnection framework.

Question 14. How should the Commission address situations where exigent circumstances delay a project's review or approval to interconnect from proceeding? Examples include unexpected developments, need for additional studies, changing guidelines, etc.

GreenSpark Response to Question 14:

The Commission should establish a framework that balances timely review with the flexibility needed to address legitimate, project-specific circumstances. In more mature distributed energy markets, defined review timelines are often paired with provisions that allow for limited extensions when additional engineering analysis or supplemental studies

are necessary. Such extensions should be clearly documented, communicated to applicants, and tied to specific circumstances.

At the same time, factors that are foreseeable within the normal course of administering an interconnection program—such as evolving internal procedures or routine guideline updates—should not automatically result in broad timeline extensions. Maintaining accountability for established review timelines is important to provide applicants with certainty and to preserve overall queue efficiency.

The Commission should therefore track utility compliance with established timelines and require transparency when extensions are utilized. However, enforcement should also recognize legitimate circumstances that may warrant additional time, particularly where doing so improves the accuracy or reliability of the interconnection review. A balanced approach can preserve accountability while avoiding incentives to adopt unnecessarily conservative review timelines.

Question 15. Should electric distribution companies be required to provide hosting capacity maps? If yes, address benefits of maps containing feeder data and locations for substations, distribution transformers, line voltage, and related distribution assets; concerns; and map design considerations such as update frequency, transparency, filters/toggles, number and size of applications by location, identified system constraints, and complaint process.

GreenSpark Response to Question 15:

Yes. Electric distribution companies should be required to provide publicly available hosting capacity maps. Hosting capacity maps are a proven and critical tool for improving the efficiency, transparency, and predictability of the interconnection process. They allow developers and customers to identify areas of the distribution system with available capacity before submitting an application, resulting in better-informed project siting decisions and reducing the number of speculative or infeasible applications entering the queue.

The benefits extend beyond project developers. By providing greater visibility into system conditions, hosting capacity maps can help utilities focus engineering resources on applications with a higher likelihood of success, reducing unnecessary studies, minimizing queue congestion, and decreasing the frequency of restudies caused by project withdrawals. Greater transparency can therefore improve overall interconnection timelines and outcomes for all stakeholders.

The Commission should require maps to include, at a minimum, feeder-level hosting capacity information, substation locations, line voltage information, known system

constraints, and other distribution system characteristics necessary to understand interconnection opportunities and limitations. Information should be presented in a user-friendly format with filtering and search capabilities that allow users to evaluate generation and load opportunities across the service territory.

Maps should be updated on a regular basis to ensure that information reflects current system conditions and queue activity. The Commission should also consider requiring visibility into pending interconnection activity at an aggregated level, including the location and status of queued projects, while appropriately protecting confidential and commercially sensitive information.

Pennsylvania does not need to develop these requirements from scratch. Several states have successfully implemented advanced hosting capacity map programs that can serve as useful models. In particular, New York's hosting capacity maps provide one of the most comprehensive and transparent examples currently available and demonstrate how detailed system information can support efficient interconnection planning while reducing uncertainty for applicants.

Ultimately, hosting capacity maps represent a relatively low-cost tool that can improve transparency, reduce unnecessary interconnection requests, streamline utility review processes, and support the continued growth of distributed energy resources across Pennsylvania.

Question 16. Should electric distribution companies be required to publish a public list of projects in the load interconnection queue? If yes, address benefits of posting queue position, nameplate capacity, and circuit identifier while protecting project owner identity and project location; concerns; and considerations such as update timing, transparency, filters/toggles, and complaint process.

GreenSpark Response to Question 16:

Yes. Electric distribution companies should be required to maintain and publish a public interconnection queue. Transparency into queue activity is a critical component of an efficient and predictable interconnection process and benefits utilities, developers, customers, and regulators alike.

Public queue information allows prospective applicants to better understand existing activity on a particular circuit or feeder before investing significant time and resources into project development. This visibility can help developers identify areas where interconnection opportunities are more likely to be successful and avoid locations where substantial existing queue activity may create additional challenges. As a result, a

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transparent queue can reduce speculative applications, improve project siting decisions, and ultimately lessen unnecessary burdens on utility review processes.

The Commission should require utilities to publish key project information, including queue position, project size, circuit or feeder identifier, application status, and major project milestones. At the same time, reasonable protections should be maintained for commercially sensitive information, including specific project locations and ownership details where appropriate. The goal should be to provide sufficient information for stakeholders to understand system activity and queue dynamics without compromising confidentiality.

Queue information should be updated on a regular and predictable basis. Monthly updates would provide applicants with timely information while remaining administratively manageable for utilities. The data should be presented in a user-friendly format that allows users to sort and filter by utility, feeder, project size, application status, and other relevant characteristics.

In addition to supporting individual project decisions, public queue transparency can improve overall interconnection outcomes. Developers are better positioned to assess project viability at an early stage, resulting in fewer applications that are unlikely to proceed and reducing the likelihood of project withdrawals later in the process. This, in turn, can decrease the need for costly and time-consuming restudies that often occur when projects ahead in the queue are withdrawn.

Pennsylvania can draw from established practices in other states with active distributed energy markets, where public queue reporting has become a standard component of interconnection administration. A well-designed queue transparency framework will improve visibility, support informed investment decisions, enhance stakeholder confidence, and contribute to a more efficient and predictable interconnection process.