

Pamela Polacek, Chief Legal & Regulatory Officer
Direct Mail: P.O. Box 129; Venetia PA 15367
Direct Phone: 570-724-9469 (o); 717-503-6531 (m)
ppolacek@ctenterprises.org

July 24, 2026

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

VIA E-FILING

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

Dear Secretary Homsher:

Enclosed for filing with the Commission are the Comments of Citizens' Electric Company of Lewisburg, PA and Wellsboro Electric Company to the Secretarial Letter issued on June 22, 2026 in the above-referenced matter.

This filing has been served via email on the parties listed on the attached Certificate of Service. If you have any questions regarding this filing, please feel free to contact the undersigned. Thank you.

Very truly yours,

Pamela C. Polacek

By

Pamela C. Polacek

Counsel to Citizens' Electric Company of Lewisburg, PA and
Wellsboro Electric Company

Enclosure

c: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA E-MAIL

Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
ra-sba@pa.gov

Allison Kaster, Esq.
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120
akaster@pa.gov

Office of Consumer Advocate
555 Walnut Street
Forum Place - 5th Floor
Harrisburg, PA 17101-1921
ra-oca@paoca.org

Pamela C. Polacek

Pamela C. Polacek (PA ID No. 78276)

Dated this 24th day of July, 2026, in Venetia, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**COMMENTS OF CITIZENS' ELECTRIC COMPANY OF LEWISBURG, PA AND
WELLSBORO ELECTRIC COMPANY
ON JUNE 22, 2026 SECRETARIAL LETTER**

Citizens' Electric Company of Lewisburg, PA ("Citizens") and Wellsboro Electric Company ("Wellsboro") (jointly the "C&T Companies") hereby submit these comments in response to the Secretarial Letter issued on June 22, 2026 in *Potential Regulations for Interconnecting Electric Loads*. The Secretarial Letter explains that the Pennsylvania Public Utility Commission ("PUC" or "Commission") is considering the potential promulgation of regulations for interconnecting electric loads, including large loads. The Commission attached sixteen (16) questions for public comment.

Citizens' and Wellsboro are two of the smaller Electric Distribution Companies ("EDCs") in Pennsylvania. As a threshold matter, we urge the Commission to weigh the costs and benefits of any future regulatory requirements that are considered in this initiative. From our experience, there are not problems with interconnecting loads in our territories. Citizens' current service territory peak load is approximately 50 MW, while Wellsboro's peak load is approximately 25 MW. Based on the 50 MW threshold for the model large load tariff that the Commission adopted, it is highly unlikely that Citizens' or Wellsboro will receive multiple large load interconnection requests. If a problem is found to exist in interconnecting electric loads to some EDC distribution systems, then the Commission should consider targeted efforts to address the situation. Broad brush regulations or other regulatory requirements in the absence of documented problems will

serve only to increase the burden on EDCs and their ratepayers without a corresponding benefit. If the Commission proceeds with regulations on this topic, we urge the Commission to remain targeted in its approach.

Interconnection Questions

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

It isn't clear that a load interconnection "problem" exists in the smaller territories that would warrant the issuance of regulations. We regularly receive inquiries regarding potential new service locations and process them in a timely manner. We urge the Commission to weigh the costs and benefits of creating load interconnection regulations prior to undertaking a formal process.

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

Please see the response to Question 1.

- 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.**

The utility's review of each interconnection will vary based on a number of factors, including size, voltage, load factor and other considerations. In addition, the review process may vary depending on the utility system involved. Commission-established "review levels" are not appropriate.

- 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?**

Citizens' and Wellsboro would study any new interconnection containing both customer load and generation on an integrated basis. The review time will depend on many factors and should not be presumptively "expedited" because generation is included.

- 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.**

Citizens' and Wellsboro do not have portals. We do not believe that the creation of portals should be mandated. Large documents can be submitted or exchanged through secure document applications.

- 6. What are some methods that may be used to discourage applicants from submitting duplicative projects with different EDCs?**

Citizens' and Wellsboro do not perceive this to be a problem and therefore have no comments on this topic.

- 7. In order to establish a position in the EDC'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 EDCs?**

Citizens' and Wellsboro do not maintain load interconnection queues. As set forth above, we do not perceive duplicative projects to be a pressing concern.

- 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.**

Citizens' and Wellsboro do not maintain load interconnection queues; however, in general, projects can only be processed after certain information is provided and any project that provides the necessary information first will move through the process more quickly.

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

See the response to Question 8.

- 10. For the load interconnection applications, should the EDCs charge an application fee? If yes, please answer the following:**

- a. Should a fee be required for load sizes above a certain minimum threshold and should such a fee increase based on the size of load? If so, what should that threshold be?**
- b. What payment methods should EDCs accept?**
- c. Should EDCs allow for electronic payments without administration fees?**
- d. Should an EDC's costs for processing load interconnection requests be aligned with the cost structure for load interconnection application fees?**
- e. Should there be more oversight of load interconnection application fees to avoid any potential arbitrary fees?**

Citizens' and Wellsboro are not commenting on this item.

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.

Citizens' and Wellsboro maintain reasonable contact with customers seeking new service lines. This includes communicating with the customer regarding the expected timelines for review and additional contact. We do not perceive that there is a need for a standardized PUC timeline or communications cadence.

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.

- a. What is a reasonable timeframe to complete a load interconnection application review?**
- b. What timeline should exist for EDCs to complete the review of collocated load and generation requests, if any?**
- c. If an EDC exceeds its expected review timeline, what actions should the EDC be required to take?**

Citizens' and Wellsboro do not support the Commission establishing timelines for the review and processing of load service requests. There is no indication that we have failed to respond in a timely manner to new service requests or that this is a problem in our territories.

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

We do not maintain queues for either generation or load interconnection requests. All projects are dealt with as they are received with complete information.

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.

By their very nature, exigent circumstances are not predictable and must be addressed with flexibility. Interconnection requests for very unique loads will require the commitment of both parties (the utility and the customer) to working cooperatively through a variety of issues—both those that are known or anticipated and those that are not known or unanticipated.

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.**

EDCs should not be required to host capacity maps. There is no evidence that capacity maps are a cost-effective method to provide timely and accurate information to customers who are considering projects to interconnect generation to the distribution system. Creating and updating hosting maps that would be relied upon by both generation interconnections and load interconnections would make the information even less reliable as a customer cannot be aware of other projects that are under contemplation by other parties. Hosting maps would place added work and cost on a small EDC with a non-demonstrated benefit.

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.**

While Citizens' and Wellsboro appreciate the Commission's current concern with the interconnection of hyperscaler customers, we urge the Commission to be cautious in placing additional regulatory requirements on all load interconnections.

Respectfully submitted,

Pamela C. Polacek

By _____

Pamela C. Polacek (PA ID. No. 78276)
Chief Legal and Regulatory Officer
C&T Enterprises, Inc.
P.O. Box 129
Venetia, PA 15367
Phone: (570) 724-9496; (717) 503-6531(c)
ppolacek@ctenterprises.org

Counsel to Citizens' Electric Company of
Lewisburg, PA, and Wellsboro Electric
Company

Date: July 24, 2026