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July 24, 2026

VIA E-FILING

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

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

Dear Secretary Homsher:

Enclosed for e-filing, are the Comments of UGI Utilities, Inc. – Electric Division to the Secretarial Letter of June 22, 2026, in connection with the above-captioned docket.

Should you have any questions concerning this filing, please contact me via email at TuniloC@ugicorp.com.

Sincerely,

Candis A. Tunilo

Enclosure

Cc: Darren D. Gill, Deputy Director (dgill@pa.gov)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Potential Regulations for	**:**	
Interconnecting Electric Loads	**:**	**L-2025-3059032**

COMMENTS OF UGI UTILITIES, INC. – ELECTRIC DIVISION

AND NOW comes UGI Utilities, Inc. – Electric Division ("UGI Electric" or the "Company") to provide these comments to questions from the Public Utility Commission ("Commission") relating to the possibility of promulgating regulations for interconnecting electric loads, including large loads.

I. INTRODUCTION

At the Commission's December 4, 2025, Public Meeting, Vice Chair Kimberly Barrow ("VC Barrow") moved for the Commission's Law Bureau to deliver a Notice of Proposed Rulemaking ("NOPR") to modernize the Commission's electric interconnection regulations.[1] VC Barrow noted that the Commission's interconnection regulations were originally promulgated in 2006 and were in need of an update to address the development of distributed storage.[2] Further, VC Barrow also noted that the Federal Energy Regulatory Commission ("FERC") had recently approved revisions to PJM's interconnection policies "that would provide greater responsibility to states for projects seeking to participate in wholesale markets, but which are interconnected to the distribution system."[3]

On April 29, 2026, the Commission's Bureau of Technical Utility Services ("TUS") issued data requests to Electric Distribution Companies ("EDCs") within the Commission's jurisdiction ("TUS Data Requests"). UGI Electric filed its responses to TUS's data requests in the above-

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[1] *See* Motion of Vice Chair Kimberly Barrow, Docket No. L-2025-3059032 (entered Dec. 18, 2025).
[2] *Id*.
[3] *Id*., *citing PJM Interconnection L.L.C.*, Docket No. ER26-5 (Designated Letter Order entered Dec. 4, 2025).

captioned docket on May 6, 2026. Thereafter, on June 22, 2026, a Secretarial Letter was issued in the above-captioned docket seeking comments from interested parties "regarding the possibility of promulgating regulations for interconnecting electric loads, including large loads." Attached to the Secretarial Letter were sixteen (16) questions, with some having subparts, to which interested parties were asked to answer. The Secretarial Letter was published in the *Pennsylvania Bulletin* on July 4, 2026, thereby setting the due date for comments as July 24, 2026.

UGI Electric thanks the Commission for the opportunity to provide information pursuant to the request in the Secretarial Letter. UGI Electric provides responses herein to a small subset of the questions set forth in the Secretarial Letter, where the Company feels it has information or specific positions that the Commission should consider. Generally, however, the Company urges the Commission to consider the disproportionate impact any regulations relating to large load interconnection could have on small EDCs and therefore, consider an EDC size threshold for which any new regulations would apply. In addition, UGI Electric encourages the Commission to provide an adequate timeline for the adoption of any modifications that may be contemplated as part of any rulemaking.

II. COMMENTS

A. Introduction.

UGI Electric is an EDC providing electric distribution service to approximately 63,000 customers in Luzerne and Wyoming Counties in Northeastern Pennsylvania. The Company's service territory is mainly rural, with urban areas located on the outskirts of the city of Wilkes-Barre, and in total the service territory encompasses approximately 410 square miles. UGI Electric owns, operates and maintains over 1,250 circuit miles of overhead and underground primary distribution lines; 13 distribution substations and 55 distribution circuits. In addition, the Company owns and operates one Bulk Electric System substation, 16.5 miles of double circuit 230 kV transmission lines and 126 miles of 66 kV transmission lines. The Company is a member of the PJM Interconnection LLC ("PJM") and sits on the PJM Transmission Owners Agreement-Administrative Committee.

As a small EDC, UGI Electric has concerns about new regulations relating to large load interconnections having a disproportionate impact on the Company, especially in instances when the cost of implementation would far outweigh any benefits. As such, UGI Electric urges the Commission to create a carve-out for small EDCs, including UGI Electric, if it moves forward with promulgating new regulations on this topic.

B. UGI Electric's Process for Connecting New Load.

At the outset, UGI Electric submits that it provided its process for connecting new load to the Company's distribution system in responses to the TUS Data Requests. To summarize, UGI Electric maintains an Electric Service Request webpage, where customers and applicants can submit service requests for new construction service, removing or upgrading a service, demolition or temporary service. While this is not a formal application, the customer or applicant (hereinafter, collectively "customer") provides contact information, and upon receipt, UGI Electric follows up to determine the characteristics of the service request and obtain supporting documentation.

Thereafter, UGI Electric submits the information to the appropriate internal business partners, who will conduct additional customer outreach. More specifically, distribution generation requests are processed by the Company's Planning Department. The Planning Department also reviews distribution residential interconnections, distribution commercial and industrial loads, and transmission load and generation requests, but the projects are managed by other departments. An engineering technician manages customer interaction and project engineering and construction for distribution residential interconnections. Additionally, for distribution commercial and industrial loads, an engineer or engineering technician manages the project engineering and construction (three-phase and large load) as well as the customer interaction and project engineering and construction (non-three phase and smaller loads). The Company's Sales and Marketing group manages customer interaction for three-phase and large load for distribution commercial and industrial load customers. Finally, for transmission load and generation, the requests are reviewed by the Planning Department while an engineering team manages project engineering and construction, and the Sales and Marketing group manages customer interaction.

UGI Electric does not impose any application fees. For projects with large loads or complex designs, however, the Company enters into an agreement with the customer for engineering services. The agreement requires that the customer be responsible to UGI Electric for its costs to engineer and design the project. If payments are made electronically by the customer, the customer is also responsible for any related administrative service fees.

Load and generation requests are reviewed and studied by the Company in separate queues. The Company makes information about queue position and status of load studies available to customers typically upon project initiation. Customers are kept informed of timelines throughout the process by the department responsible for customer interaction or in the written agreement, if an agreement is required. Further, this information will be provided at other times during the project upon customer request and at critical decision points in the project timeline. For all distribution requests, UGI Electric performs studies including a basic overload assessment, voltage analysis and protection. For transmission requests, UGI Electric performs the same studies required for the PJM planning process.

The Company does not have prescribed timelines for interconnection requests. Delays in the review process can occur, usually when the customer provides incorrect load information or information is not provided with sufficient detail to complete a proper load evaluation. Also, changes in design or in the service request may lead to delays. Further, supply chain bottlenecks for equipment related to necessary substation upgrades to accommodate growing load requirements can cause extensive delays (at times, up to five years) that may delay interconnection.

C. **UGI Electric's Comments to the Secretarial Letter.**

UGI Electric provides these additional general comments to the Secretarial Letter of June 22, 2026. First, UGI Electric submits that additional guidance could be beneficial in the context of connecting large loads, but regulations may not be necessary.[4] Any guidance should be specifically applicable to large loads, however, with "large load" defined consistent with FERC's characterization thereof when EDCs do not have the term defined in their tariffs.[5] Also, depending on the size and type of the load interconnection request, EDCs will require flexibility to accommodate the PJM load interconnection process.

Additionally, the Company submits that caution should be exercised in providing requirements that could place unnecessary costs on ratepayers or utilities, including but not limited to, allowing electronic payments without administration fees[6] or requiring EDCs to provide online portals[7] for load-connecting customers. Applications do not always result in the connection of new load. As such, the customer applying for new load should be responsible for fees related to the application. Also, costly new process requirements should not be imposed when there has been no showing of any EDC's current application process being deficient. Further, with regard to both of

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[4] *See* Secretarial Letter at Ques. 1.
[5] *See* Secretarial Letter at Ques. 2, 3.
[6] *See* Secretarial Letter at Ques. 10(c).
[7] *See* Secretarial Letter at Ques. 5.

these, the demand and impact on small EDCs is likely to be very different than what is experienced by larger EDCs, and the Commission should take this into consideration in right-sizing policies.

Finally, UGI Electric submits that requirements to develop hosting capacity maps[8] or maintain a list of projects in queues[9] would not only place unnecessary costs on ratepayers or utilities but would also publicly disclose the location of critical infrastructure without any corresponding need or benefit. As such, these possible requirements should not be entertained.

III. CONCLUSION

UGI Electric thanks the Commission for taking up this important topic and providing the opportunity to submit these Comments.

Respectfully submitted,

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8 *See* Secretarial Letter at Ques. 15.
9 *See* Secretarial Letter at Ques. 16.