



COMMONWEALTH OF PENNSYLVANIA

July 24, 2026

E-FILED

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 please find the Comments to the Secretary Letter, dated June 22, 2026, issued in the above matter, which was published in the PA Bulletin on July 4, 2026, on behalf of the Office of Small Business Advocate ("OSBA"), in the above-referenced proceeding.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Rebecca Forbes
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**COMMENTS
OF THE
OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (OSBA) appreciates the opportunity to provide comments regarding the Commission's consideration of regulations governing the interconnection of electric loads. The OSBA supports the Commission's effort to establish a clear and transparent regulatory framework for load interconnections. As the Commission develops these regulations, the OSBA encourages the adoption of requirements that facilitate efficient interconnection while protecting existing customers from unreasonable costs and risks associated with new load additions.

Electric Load Interconnection Issues That Should Be Addressed Through Regulation

The OSBA supports regulations that are grounded in cost causation principles and protect existing customers from bearing costs associated with new load interconnections. Regulations should establish clear requirements regarding cost responsibility, study deposits and application fees, queue management, timelines, and protections against stranded costs. A clear regulatory framework will provide greater certainty for applicants and utilities while ensuring that existing customers, including small business customers, are not required to subsidize the costs or risks associated with new load interconnections.

Applicability of Load Interconnection Regulations

The OSBA recommends that load interconnection requirements be tailored to the size and system impact of the proposed interconnection. Routine service requests should not be subject to the same requirements as large load projects that require extensive engineering review or significant system upgrades. Regulations should establish objective criteria that distinguish projects based on their size and impact on the electric system while maintaining fair and non-discriminatory treatment of similarly situated customers.

Respectfully submitted,

/s/ Steven C. Gray

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For:
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DATE: July 24, 2026