

July 24, 2026

Filed Electronically

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

**Re: Comments of the Coalition Advocating DER Regulation Efficiency (“CADRE”) in
Docket No. L-2025-3059032, Potential Regulations for Interconnecting Electric Loads**

Dear Secretary Homsher:

The Coalition Advocating DER Regulation Efficiency (“CADRE”) submits these letter comments in response to the Commission's Secretarial Letter of June 22, 2026, (“June 22 Letter”) which seeks comments on the possibility of promulgating regulations for the interconnection of electric load.

CADRE is firmly in support of the Commission undertaking a rulemaking to support more efficient interconnections of loads **and** generation resources in the Commonwealth. CADRE takes no particular position on any of the specific questions presented by the Commission in the June 22 Letter but instead notes that the questions presented focus almost exclusively on the interconnection of loads and largely ignores the interconnection of generation resources.

The Commission has existing regulations regarding small generator interconnections.¹ The last substantive iteration of those regulations was issued in November 2016 – ten years ago. Much has changed in ten years in the electricity market. For instance, generation technologies have changed and improved. Software to evaluate interconnection impacts has improved and is no longer the sole domain of the utilities. Tools to communicate grid conditions have improved. FERC Order No. 2222 has been issued and PJM and the PJM states, including Pennsylvania are working toward a fully robust development of the DER market, allowing DERs to inject power

¹ See *Generally*, 52 PA Code Chapter 75, Subchapter C. Interconnection Standards.

back into the grid. Perhaps most importantly, energy and capacity prices in PJM's market are the highest they have ever been, signaling a need for more generation resources.

The current generation interconnection standards were designed under the auspices of the Alternative Energy Portfolio Standards act of 2004 and the interconnecting resources considered at the time were net energy metered ("NEM") resources. FERC Order No. 2222 has expanded the resource mix that can contribute electrons back to the grid, and small generator interconnections are no longer limited to NEM resources. There is much room for improvement and modernization of the generator interconnection standards, and these improvements could be addressed simultaneously with the development of regulations governing interconnections of new customer load. A few simple and low-cost improvements for generation interconnections include:

- The EDCs currently have inconsistent interconnection practices and timelines. We urge the Commission to streamline and standardize the interconnection process across all EDCs. The Commission should require EDCs to provide automated platforms for interconnection requests that include built-in application error checking, options for e-signatures, options for electronic payment, online scheduling for inspections or remote inspections, online updates on application status, and online notice that the resource owner has permission to operate ("PTO"). The Commission should also require that PTO timelines be capped (for example, 30 days after date of application). For residential interconnections, if the EDC fails to respond within the set period, the customer seeking interconnection should be deemed to have PTO. These same processes could apply to interconnecting loads.
- EDCs should be required to refund customers or pay fines – not recoverable from ratepayers – to the Commission for failing to meet interconnection timeline requirements. These fines could be distributed by the Commission to affected customers or to support other need-based customers. Colorado has recently implemented a policy to refund customers up to 100% of the cost of the interconnection application if the host utility does not meet stated timelines. EDC accountability policies could also apply to interconnecting loads.
- The EDCs should be required to post hosting capacity maps showing where interconnection is readily available without an upgrade. These maps are not available today in Pennsylvania, but they are available in other neighboring states including New Jersey, Maryland, Delaware and New York.² Once implemented, these maps should be updated on a routine basis, and over time, updated to

² See: <https://www.energy.gov/eere/us-atlas-electric-distribution-system-hosting-capacity-maps>. Some of these states' maps are limited to EVs, storage or other resources.

immediately reflect changes in network conditions. Hosting maps could prove informative to interconnecting loads.

- The EDCs evaluate interconnecting resources individually and assess the engineering needs to interconnect each individual customer using methodologies that are opaque to the interconnecting customers. The current approach has the potential to create significant first mover disadvantages as the first mover might have to pay a six-figure interconnection cost, but then the property next door can interconnect a resource for practically no cost. The Commission should strive for uniformity of interconnection costs, seeking an approach that neither provides undue incentives nor disincentives to interconnections.

CADRE is supportive of the Commission's efforts to develop regulations regarding interconnecting loads but encourages the Commission to expand the rulemaking to modernize the generator interconnection standards simultaneously.

Sincerely,

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