



July 24, 2026

VIA E-FILING

Secretary Matthew L. Homsher
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,

Please find enclosed for filing on the above-referenced docket the Comments of the Energy Justice Advocates in regard to the Commission's list of questions published in the Pennsylvania Bulletin on July 4, 2026. Should you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Potential Regulations for
Interconnecting Electric Loads

Docket No. L-2025-3059032

COMMENTS OF THE ENERGY JUSTICE ADVOCATES

July 24, 2026

I. INTRODUCTION

On December 18, 2025, Pennsylvania Public Utilities Commission (“PA PUC” or the “Commission”) Vice Chair Kimberly Barrow moved to initiate a rulemaking to modernize the Commission’s interconnection regulations, docketed at Docket No. L-2025-3059032.¹ On June 22, 2026, the Commission posted a letter on this docket (“Commission Letter”) seeking comments from interested parties responding to a set of 16 questions regarding the potential promulgation of regulations for interconnection of electric loads.²

Pursuant to that invitation, POWER Interfaith, Sierra Club, Vote Solar, Physicians for Social Responsibility Pennsylvania, Clean Air Council, Pennsylvania Stands Up, and Third Act Pennsylvania (collectively, the “Energy Justice Advocates” or “EJA”), respectfully submit the below comments.³ EJA also contributed to and signed onto the comments of the Joint Energy Advocates submitted in response to the Commission Letter; this Comment Letter provides additional supplemental comments on Questions #1, #5, #13, and #14.

II. DISCUSSION

Question #1. What electric load interconnection issues should be addressed via regulation?

Please list the specific issues and how a regulation would be beneficial.

A systems-level approach, consistent with integrated distribution planning (“IDP”), is essential. Load interconnection regulations crafted to efficiently integrate load must be grounded

¹ Pa. P.U.C., Motion of Vice Chair Kimberly Barrow, *Revisions to Interconnection Rules*, Docket No. L-2025-3059032 (Dec. 18, 2025), <https://www.puc.pa.gov/pcdocs/1906951.pdf>.

² Pa. P.U.C., Load Interconnection Rulemaking Questions, *Revisions to Interconnection Rules*, Docket No. L-2025-3059032 (June 22, 2026).

³ These comments are submitted in accordance with the submission deadline of 20 calendar days from the Commission Letter’s publication in the Pennsylvania Bulletin on July 4, 2026. Pa. Bulletin, Load Interconnection Rulemaking Questions, *Potential Regulations for Interconnecting Electric Loads; Doc. No. L-2025-3059032*, 56 Pa.B. 3865 (July 4, 2026), <https://www.pacodeandbulletin.gov/Display/pabull?file=/secure/pabulletin/data/vol56/56-27/942.html>.

in a comprehensive and transparent understanding of distribution system status and needs based on the interaction of generation, load, network topology, and grid-serving flexible assets such as battery storage.

In its work on load interconnection, the Commission should act to advance three overarching and related goals:

1. Increase grid transparency to support customer confidence and enhance regulatory scrutiny of utility spending and decision-making.
2. Ensure any load interconnection study regulations accurately capture flexible load.
3. Develop appropriate interconnection standards for energy storage, which can serve as a supply resource, but which has load characteristics while charging.

Goal 1: Grid Transparency

Regulatory actions should include the following to enable grid transparency:

- Standardize application requirements;
- Establish statewide customer communication requirements;
- Establish consistent and transparent timelines for applicant review;
- Establish hosting capacity transparency and data access;
- Standardize interconnection study methodologies, including accounting for load flexibility;
- Standardize interconnection options and protocols for operational flexibility, interoperability, and orchestration;
- Integrate queue management transparency; and
- Standardize methodologies for hosting capacity analyses and mapping.

Goal 2: Ensure any load interconnection study regulations accurately capture flexible load

Pennsylvania's two-decade old interconnection regulations are not inclusive of flexible grid-serving technologies whose non-static operational characteristics may encompass both load and supply. It is imperative that regulations clarify how these resources must be evaluated by electric distribution companies ("EDCs") to ensure their system impacts are not overestimated and are analyzed based on their true operational capabilities and obligations. Clear regulations for interconnecting flexible loads such as smart buildings, and hybrid distributed resources such as battery storage and electric vehicle charging, must include best practices regarding the evaluation of their load.

Goal 3: Develop appropriate interconnection standards for energy storage, which can serve as a supply resource, but which has load characteristics while charging

Regarding battery storage, according to the Interstate Renewable Energy Council ("IREC"), a national authority on interconnection procedures:

Two of the most elementary barriers to energy storage system interconnection are the lack of inclusion of storage in interconnection rules, and the lack of clarity as to whether and how existing interconnection rules (and related documents, such as application forms and agreements) apply to storage systems.⁴

Pennsylvania's interconnection rules currently do not include battery storage among lists of facilities eligible for interconnection, and any applicable rules do not capture the grid-serving and flexible operational capabilities of storage.⁵ The lack of specific rules that encompass these

⁴ Bldg. a Tech. Reliable Interconnection Evolution for Storage, II. *Updating Interconnection Procedures to Be Inclusive of Storage*, Interstate Renewable Energy Council, <https://energystorageinterconnection.org/ii-updating-interconnection-procedures-to-be-inclusive-of-storage/> (last accessed July 22, 2026) (internal citation omitted).

⁵ Pa. P.U.C., Motion of Vice Chair Kimberly Barrow, *Revisions to Interconnection Rules*, Docket No. L-2025-3059032 (Dec. 18, 2025), <https://www.puc.pa.gov/pcdocs/1906951.pdf>.

grid-serving hybrid resources reduces the ability of EDCs and customers to take advantage of their cost-saving and grid-supporting capabilities.

Regulations must be able to encompass interconnections of distributed resource technologies with operational capabilities that can function as both load and generation, such as battery storage. These hybrid (load + generation) distributed resources must be studied according to methodological best practices that do not overestimate system impacts by using unrealistic operating assumptions for both charging and exports. This means interconnection studies for storage should capture flexible operational capabilities that include curtailability, variable charging times and rates, interoperability, and measure net capacity instead of strictly nameplate capacity.

Correcting this regulatory gap would also be consistent with the Motion of Vice Chair Kimberly Barrow of December 18, 2025.⁶ As Vice Chair Barrow noted with reference to the Commission’s interconnection regulations, “because of the connection of our regulations to our AEPS Act, they relate only to the interconnection of Alternative Energy Systems as that term is defined in the AEPS Act. This definition excludes battery storage technologies, an exclusion which must be addressed given the development of distributed storage since that time.”⁷

Recommendations

The three goals detailed above are linked and can be advanced together through appropriate regulatory action. EJA recommends the following actions:

⁶ Pa. P.U.C., Motion of Vice Chair Kimberly Barrow, *Revisions to Interconnection Rules*, Docket No. L-2025-3059032 (Dec. 18, 2025), <https://www.puc.pa.gov/pdocs/1906951.pdf>.

⁷ *Id.*

- The PA PUC should establish a standing stakeholder working group to iteratively examine and update interconnection protocols in alignment with national best practices similar to what has been implemented or is in the process of being implemented across the country, including in neighboring states (for example, New York, New Jersey, and Maryland).⁸
- Regulations should define Battery Energy Storage Systems (“BESS”) and other distributed resource technologies with flexible load profiles.
- Regulations should define and describe Power Control Systems (“PCS”), smart inverters, and device communication standards that capture the flexible operational capabilities of battery storage and other automated demand response and energy management technologies. This includes smart charging, interoperability, and orchestration.
- The PA PUC should require EDCs to establish interconnection procedures compliant with IEEE 1547-2018, the IEEE 2030 series, UL 3141, and National Electric Code Articles 120 and 130, among other standards.⁹

⁸ N.Y. State Dep’t of Pub. Serv., *Interconnection Technical Working Group*, <https://dps.ny.gov/interconnection-technical-working-group> (last accessed July 22, 2026); N.Y. State Dep’t of Pub. Serv., *Interconnection Policy Working Group*, <https://dps.ny.gov/interconnection-policy-working-group> (last accessed July 22, 2026); N.J.’s CleanEnergy Program, *Grid Modernization: Grid Modernization Forum Activities*, State of N.J., <https://cleanenergy.nj.gov/programs/other-initiatives/grid-modernization?section=grid-modernization-forum-activities> (last accessed July 22, 2026); Md. Pub. Serv. Comm’n, *Small Generator Interconnection*, <https://psc.maryland.gov/regulate-utilities/electricity/engineering-division/small-generator-interconnection/> (last accessed July 22, 2026).

⁹ Interstate Renewable Energy Council, *IEEE 1547™-2018 Adoption Tracker: Pennsylvania*, <https://irecusa.org/ieee-1547-2018-adoption-tracker-pennsylvania/> (last accessed July 22, 2026); IEEE Standards Assoc., *Evolving IEEE Standards Foster a More Sustainable Power Grid* (Mar. 22, 2024), <https://standards.ieee.org/beyond-standards/ieee-2030-standards/>; IEEE Standards Assoc., *IEEE Standard for Smart Energy Profile Application Protocol*, <https://standards.ieee.org/ieee/2030.5/11216/> (last accessed July 22, 2026); UL Sols., LLC, *Power Control Systems for Distributed Energy Resource Systems*, <https://www.ul.com/services/power-control-systems-distributed-energy-resource-systems> (last accessed July 22, 2026); Michal Hofkin, *Article 130 Energy Management Systems*, UL Sols., LLC, <https://www.ul.com/thecodeauthority/knowledge/article-130-energy-management-systems> (last accessed July 22, 2026). IEEE 1547-2018 discussed in first source, IEEE 2030 series and 2030.5 discussed in second and third sources, UL 3141 discussed in fourth source, and NEC discussed in fifth source.

- To limit overestimations of grid strain and account for potential grid services, flexible resources must have their service load calculations studied according to their operational capabilities, not their full nameplate capacity. For example, the 2026 National Electric Code Article 120.7 establishes the Power Control System setpoint as the standard to perform load calculations¹⁰

Question #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.

Yes. Requiring EDCs to develop an online application portal that is standardized on a statewide basis would improve the efficiency of the load interconnection process, and such an approach should also be considered for distributed energy resource interconnection. An online portal, in addition to providing an electronic means of submitting interconnection applications and supporting documents, should also provide a dashboard enabling the applicant to view the stage of review the application is in and its status.

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

While EJA does not at present take a strict position on joint versus separate queues, we believe queue structure should minimize administrative burden and emphasize transparency and

¹⁰ Elec. License Renewal, *120.7 Power Control Systems*, <https://www.electricallicenser renewal.com/Electrical-Continuing-Education-Courses/NEC-Content.php?sectionID=1843> (last updated Jan 15, 2026); Brit Heller, *Power Control Systems Just Made Load Calculations a Lot Less Painful*, Heatspring Mag. (July 7, 2026), <https://blog.heatspring.com/power-control-systems-just-made-load-calculations-a-lot-less-painful/>.

regulatory scrutiny. Whether through separate queues or an integrated one, load and generation interconnection requests should be studied in coordination with one another. Studying system load and generation trends in tandem creates opportunities for more transparent and comprehensive assessment and optimization of the distribution system. Interconnection queue management should enable more proactive and integrated distribution system planning, thereby driving more prudent cost-saving grid modernization through a mix of selective traditional upgrades and lower-cost grid services provided by distributed resources. The study of system impacts of proposed load interconnections must be done within the context of a wider landscape of interconnected resources, but does not need to be integrated into a joint queue with generation to do so.

When considering queue structure, it is important to consider that the ideal process for interconnection queue management differs for load, generation, and bidirectional distributed resources such as storage. For example, generation and load have different size thresholds that organize applicants into different study timelines. Additionally, penetration screens that trigger more detailed study of an applicant's system impacts would be methodologically different between generation and load. Best practice for generation's penetration screen (which Pennsylvania has yet to implement) is equal to 100% of line section annual minimum load,¹¹ while screening for a conventional load applicant is based on impacts to local system peak capacity. As a result, hosting capacity for generation differs from that of load, which in turn differs from hybrid resources such as battery storage. Streamlined review across these categories of interconnection should not be undermined by methodological differences in evaluating

¹¹ Interstate Renewable Energy Council, *Model Interconnection Procedures*, at 27–28 (Aug. 2023), <https://irecusa.org/wp-content/uploads/2023/08/IREC-Model-Interconnection-Procedures-2023-FINAL-8.23.23.pdf>.

applicants. In other words, a distributed solar-plus-storage application should not be held up by a large load applicant.

Queue management must also encompass hybrid distributed resources whose operational capabilities fall into both load and generation categories, such as EVs and battery storage. While these standalone systems function as load during charging periods, they possess grid-supportive functionalities that are distinct from conventional load and necessitate updated study methodologies and screening requirements.¹²

Question #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.

Allowable exigent circumstances must be highly specific and limited mainly to emergency circumstances. Exigent circumstances should not include the need for additional studies, as study hierarchies for more complex applications and associated timelines should be standardized as part of the updates to the state’s interconnection regulations. The need for additional system impact, engineering, or facilities studies should be integrated into binding review timelines. When additional studies are required, these updates should be clearly communicated to the applicant with reference to the timeline for their completion based on regulatory standards.

Changing guidelines also should not be considered an exigent circumstance, as responsible regulations would provide a transition period for which an EDC would establish

¹² Bldg. a Tech. Reliable Interconnection Evolution for Storage, *II. Updating Interconnection Procedures to Be Inclusive of Storage*, Interstate Renewable Energy Council, <https://energystorageinterconnection.org/ii-updating-interconnection-procedures-to-be-inclusive-of-storage/> (last accessed July 22, 2026).

administrative capacity to meet the requirements of the new timeline. Changing guidelines should only alter timelines if they explicitly change regulations associated with required study times. Changes to guidelines related to interconnection studies, but not explicitly changing standardized study timelines themselves, should not be used as an excuse to shift timelines that should be binding.

The Commission should appoint an interconnection ombudsperson to ensure utilities comply with timelines, maintain transparency, and clearly communicate through multiple means with regulators and applicants when applicable exigent circumstances are causing delays. The interconnection ombudsperson should also be responsible for mediating dispute resolution processes according to a procedural timeline standardized in regulation. The interconnection working group recommended above in response to Question #1 could provide a suitable forum to define the interconnection ombudsperson's role and procedures in more detail.

III. CONCLUSION

With appreciation for the opportunity to comment and in light of the foregoing, the Energy Justice Advocates respectfully request that the Commission consider the points raised in these comments as it considers its next steps.

Signatures

Dated: July 24, 2026

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