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VIA ELECTRONIC FILING

Mr. Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, PA 17120

Re: Electric Load Interconnection Questions
Docket No. L-2025-3059032

Dear Secretary Homsher:

Enclosed for filing please find Duquesne Light Company's response to the June 22, 2026 Secretarial Letter in the above referenced proceeding. If you have any questions regarding the information contained in this filing, please feel free to contact me.

Sincerely,

Lindsay A. Baxter
Senior Manager, Energy Policy and Public Affairs

Cc:
Darren Gill, dgill@pa.gov

Response of Duquesne Light Company

Electric Load Interconnection Questions

Docket No. L-2025-3059032

July 24, 2026

Duquesne Light Company ("Duquesne Light" or "Company") seeks to foster economic development in its service territory and recognizes that an efficient load interconnection process is one component to enabling this development. Below the Company provides its response to the questions posed by the Pennsylvania Public Utility Commission ("PUC" or "Commission") in its June 22, 2026 Secretarial Letter.

As a preliminary matter, new load can refer to the expansion of an existing business or campus, establishing new service for a new business or residential development, or interconnection of very large loads, such as data centers. The complexity of interconnection will differ depending on the type and size of load. Further, each electric distribution company ("EDC") operates its system at different voltages and configurations. This topic does not lend itself to a "one-size-fits-all" approach. For the purposes of responding to these questions, Duquesne Light has primarily focused on large commercial applications.

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

Generally Duquesne Light finds that EDCs should retain flexibility to establish load interconnection rules and practices, recognizing that every distribution system is unique in its voltages, service territory characteristics, and electrical configuration. This subject does not lend itself to "one-size-fits-all" rules.

While the Company does not believe additional regulation is needed, should the Commission choose to exercise authority over this subject, the Company suggests a policy statement or other form of guidance may be more appropriate than rigid regulations.

In particular, for larger load interconnections, guidance on best practice regarding establishing a queue could be helpful. EDCs can experience intervention from elected officials and government agencies who reach out on behalf of constituents. In Duquesne Light's experience, these inquiries do not result in preferential treatment for the customer, but they do take up valuable time and resources to respond. General guidance that allows EDCs to establish a process for accepting and processing applications, which may include establishment of a "queue," could support EDCs in treating all customers equitably. However, such guidance should not be overly prescriptive, recognizing the need for flexibility across EDC systems.

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

Consistent with its response to question #1, Duquesne Light does not believe load interconnection regulations are needed. Should the Commission move forward with a rulemaking on this topic, the Company recommends establishing regulations that apply based on customer class. Duquesne Light urges the PUC to align any rules with standards in existence or under development at the Federal Energy Regulatory Commission ("FERC") or PJM.

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.

For distribution-scale interconnections, DLC agrees that the level of review is strongly influenced by load size. However, size thresholds will necessarily differ from utility to utility. The PUC should not act to establish prescriptive nor static thresholds in regulation. Should the Commission wish to establish a regulatory requirement on this topic, it should consider directing EDCs to establish a tariff provision outlining the load thresholds and review levels.

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?

While Duquesne Light has been supportive of "bring your own generation" policies as a concept, expedited interconnection for load with its own generation is problematic for a number of reasons. As a preliminary matter, the Company notes there are jurisdictional challenges associated with this question. There is an ongoing proceeding at FERC related to co-located load, in which PJM has proposed that on-site generation at or above a 50 MW threshold must be market-participating and interconnected via PJM's generation interconnection queue.[1] The Company does not necessarily see a role for action at the state level to influence this timeline.

Generation below this 50 MW threshold is unlikely to be impactful in the context of generation resource adequacy and thus may not warrant preferential treatment. Should the PUC move forward with an expedited track, it must establish a minimum size threshold for generation. This threshold should be expressed as a percentage of load that would be offset by the generation.

The Company notes that expedited treatment of load with co-located generation creates potential for "gaming the system." Any effort by the PUC related to this topic must have appropriate guardrails. In addition to setting a meaningful size threshold, the Commission must consider the timing of generation coming online. To be helpful to the electric system, generation should ideally come online at the same time as load.

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[1] PJM Co-Located Load Proceeding, 190 FERC ¶ 61,115 (2025).

Due to the jurisdictional complexity and these concerns the Company recommends the PUC not address expedited interconnection for load with co-located generation in the contemplated rulemaking.

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.

It is somewhat difficult to respond to this question without knowing how the PUC is defining "portal" and any associated functionalities. While it is important to efficiently process interconnection applications, the size and complexity of large load interconnections does not fit with a standardized portal, like that which is used for distributed energy resources ("DERs").

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

Duquesne Light understands this question to be primarily focused on large load interconnections. The Company has employed various practices to vet project capability, such as verifying site control and requiring security deposits. It recognizes, though, that for large developers, increasing security fees may not deter duplicative applications, as the developer may choose to move forward with more than one project.

Duquesne Light supports the proposal to create a registry of prospective large load projects at PJM. At this time, it believes additional action at the state level is not necessary. The PUC has set clear guidance via the Model Large Load Tariff at Docket No. M-2025-3054271.

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?

As previously stated, all interconnection projects are unique, and larger projects require more complex studies. Duquesne Light currently requires a deposit to cover the actual costs of the study. The Company refunds any remaining funds and/or bills the applicant if costs exceed the deposit.

While increasing the required deposit or requiring a fee to enter the queue might discourage some speculative projects, the magnitude of investment in the data center industry leads the Company to believe that some applicants would have the means to pay a higher fee, even for duplicative applications across multiple EDCs.

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.

Duquesne Light appreciates the intent behind this question but does not support allowing projects to move ahead in the queue. Rather, certain milestones should be met to demonstrate readiness prior to a project *entering* the queue. Once in the queue, projects should advance through the process in order. Moving some projects ahead or pulling some projects back could waste time and resources by necessitating studies to be re-done, potentially resulting in cost shifting and delays to all projects. Such a provision could result in unintended consequences, including the potential for developers to "game the system" and/or opening up the potential for litigation.

The Company clarifies, though, that should a project fail to meet a required deadline or milestone, it can be removed from the queue entirely.

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

Duquesne Light does not support projects shifting positions in the queue.

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?

Duquesne Light does not currently charge an application fee but does require payment of a deposit to fund studies, based on actual costs, as described in more detail above. The Company suggests that any fees should be based on actual costs, consistent with cost causation principles. These costs will necessarily differ from utility to utility. Thus any fees should be set at the discretion of each utility and not by regulation.

b) What payment methods should EDCs accept?

Duquesne Light currently accepts payment via check, credit card, and wire transfer. However, the Company believes payment options should be at the discretion of the individual EDC. Addressing such a granular aspect of business operation in regulation risks regulatory overreach.

c) Should EDCs allow for electronic payments without administration fees?

It is unclear what is meant by "administrative fees." Duquesne Light interprets this to mean any surcharges associated with the form of payment, such as credit card fees. It is appropriate for EDCs to pass these actual costs along to the interconnecting customer, rather than spread them across all other customers. Duquesne Light currently charges a flat fee of $0.50 for wire transfers and a credit card fee of 2.85%.

d) Should an EDC's costs for processing load interconnection requests be aligned with the cost structure for load interconnection application fees?

Currently, DLC requires large load interconnection applicants to make a deposit of $250,000. These funds support EDC time and labor to develop and complete the interconnection study. If the applicant backs out of the project, the balance of the deposit is refunded.

e) Should there be more oversight of load interconnection application fees to avoid any potential arbitrary fees?

No. All EDCs are different and thus the costs of processing interconnection applications will differ from company to company. Load interconnections do not align with a "cookie cutter" fee structure. Should a customer believe it has been subject to "arbitrary fees" it can seek relief via the established PUC complaint process. Additionally the PUC has authority to institute an audit if it believes a utility's fee structure is unreasonable.

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.

Currently, Duquesne Light communicates status to customers when there are updates or if the customer inquiries on the status of their application. For customers who are primary in the queue, the Company is likely in touch regularly. Communications are infrequent for projects waiting in the queue because there are no updates to provide.

Duquesne Light does not believe Commission action is warranted on this topic. However, should the PUC wish to act, the Company recommends providing policy guidance, rather than rigid regulations. Any expectations for customer communications should be trigger-based, for example when the applicant's position in the queue changes, rather than time-based. The Company has significant concerns about the cost and administrative burden of a more robust communication process that does not provide meaningful benefit.

12. Should there be prescribed timelines and timeframes for completing the various steps in the load interconnection application review process? If so:

No, the Company strongly opposes prescribed timelines set by the Commission. Each EDC's system and operations are different. Importantly, each application is unique. Larger loads require longer study times and more complex configurations. However even smaller projects on the distribution side can cause cascading transmission constraints. Finally, there are many steps in the process outside of the EDC's control, such as the PJM study window.

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.** There is not a standard process nor timeline for studying and interconnecting new load, as the necessary steps to ensure reliability and safety may differ depending on the size and characteristics of the load.

   All loads, regardless of size, will require a power flow study. This study identifies the necessary system upgrades to deliver the requested load without causing harm to equipment or other customers. Similarly, all loads will require some type of feasibility study which is used to scope the project interconnection inclusive of system upgrades identified in the power flow study. This study is generally more practical in nature (i.e. the physical interconnection, what equipment needs to be installed, the timeline and costs of construction, etc.). All loads generally require short circuit and coordination studies, as well, which assess the performance of protection systems.

   For very large transmission interconnections, the EDC may also need to perform stability studies and/or electromagnetic transients studies.

b) **What is a reasonable timeframe to complete a load interconnection application review?** Duquesne Light respectfully declines to provide a response as there is not a single timeframe for all load interconnection application reviews.

c) **What timeline should exist for EDCs to complete the review of collocated load and generation requests, if any?** As stated above, there are jurisdictional concerns with collocated generation and the ongoing FERC proceeding.

d) **If an EDC exceeds its expected review timeline, what actions should the EDC be required to take?** Duquesne Light objects to the implied intent of this question. The time to complete a load interconnection review will vary based on many factors, including the size and configuration of a project, the proposed location, and any associated grid constraints. The question implies that EDCs should suffer consequences for not completing studies by an arbitrary timeline, which risks incentivizing speed over the completeness of the reliability and safety review.

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

The intent of this question is somewhat unclear. EDCs review DER interconnection for net metered resources. Other generation is generally interconnected via the PJM wholesale market. The Company maintains separate processes for reviewing DER interconnection and reviewing new load. It does not opine on whether all EDCs should follow a similar process. Rather, the system of accepting and processing applications seems to be a matter of management discretion, not dictated by regulation.

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.

Duquesne Light reiterates its opposition to setting strict one-size-fits-all timelines. However, should the Commission establish timeframes for the review and study of load interconnections it must include provisions to stop the timeclock when circumstances outside of the EDC's control arise, such as awaiting additional information or clarifications from the applicant or pending completion of PJM studies.

The Company is not clear what the examples provided in the question refer to ("Examples of these circumstances may include unexpected developments, need for additional studies, changing guidelines, etc."). It is critical, though, that the EDC be protected from penalty for delays necessary to ensure the reliability and safety of the system for other customers. The Company is staunchly opposed to any suggestion that speed to market for an interconnecting customer should trump the safety of the system.

15. Should EDCs be required to provide hosting capacity maps?

No. Hosting capacity maps serve little utility for load interconnection of any size and especially not for large load interconnections. To establish a dynamic hosting map that is up-to-date would require extensive technology investment.

> **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?**
>
> The Company does not believe any benefits associated with these maps would justify the expense to its customers required for the technology investment. While a more rudimentary map might be able to be created for less cost, it would become outdated nearly immediately and provide very limited value to customers.

b) What are the concerns regarding this requirement, if any?

Duquesne Light's primary concern is that the interconnection of customers is a dynamic process, constantly changing. A map would become outdated and of limited utility almost immediately after being posted. While some regions have created hosting maps for DER, most are illustrative in nature. This level of hosting map would be meaningless to a developer of new load, while requiring significant resources to produce and maintain.

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.

Duquesne Light opposes the proposed requirement for hosting capacity maps and thus declines to provide a response.

16. Should EDCs be required to publish a public list of projects in an EDC's load interconnection queue?

As DLC stated in its comments regarding the large load model tariff, it is open to making information on project status available to the Commission but fails to see the value in posting this information publicly for several reasons. First, the status of an application impacts a relatively small number of customers and is not relevant to the general public. Second, it may trigger confidentiality concerns. While the name of the applicant will not be released, the Company anticipates concern from customers about the ability of other stakeholders, including its competitors, to discern who the project developer is. Third, this proposal adds administrative burden, when the focus should instead be on identifying efficiencies. Finally, posting the list publicly is inappropriate due to the early nature of these projects. The interconnection study occurs early in the development process to determine if electrical interconnection is even feasible at the desired location. Not all projects who pursue interconnection studies will ultimately move forward. Publicly identifying potential projects could have unintended consequences, such as impacting property values, triggering community opposition, and/or impacting local land use decisions.

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?

Duquesne Light does not support this proposed requirement, nor does it perceive any benefits.

b) What are the concerns regarding this requirement, if any?

Beyond the concerns already expressed, the Company also notes its concern with creating requirements on this matter via regulation. This is a rapidly evolving topic. The PUC should avoid creating requirements that may not be relevant in five to 10 years. There are several

instances where current regulations contain outdated requirements because there is not bandwidth or appetite to open rulemakings to remove irrelevant provisions. To avoid recreating this scenario, this topic is best addressed via the model tariff, which allows for less burdensome updates as circumstances change.

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.

Duquesne Light does not support this proposed requirement, nor does it perceive any benefits.