July 24, 2026

VIA ELECTRONIC FILING

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

Re: Potential Regulations for Interconnecting Electric Loads; Docket No. L-20253059032 - Comments of The Interstate Renewable Energy Council, Inc.

Dear Secretary Homsher,

Enclosed for filing in the above-referenced docket please find the Comments of The Interstate Renewable Energy Council, Inc., submitted in response to the Commission's Secretarial Letter published in the Pennsylvania Bulletin on July 4, 2026, at 56 Pa.B. 3865. Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

COMMENTS OF THE INTERSTATE RENEWABLE ENERGY COUNCIL, INC.

I. INTRODUCTION

On July 4, 2026, the Pennsylvania Public Utility Commission (Commission) published a Secretarial Letter in the Pennsylvania Bulletin at 56 Pa.B. 3865, seeking comments from all interested parties regarding the possibility of promulgating regulations for interconnecting electric loads, including large loads, in Docket No. L2025-3059032. The Secretarial Letter requested comments on a list of questions and any other topics that interested parties believe should be included in potential regulations on the interconnection of electric loads within twenty calendar days from the date of publication. The Interstate Renewable Energy Council (IREC) respectfully submits the following comments on the questions posed and an additional topic, proactive distribution upgrades.

II. BACKGROUND

IREC is a 501(c)(3) non-partisan, non-profit organization working nationally to build the foundation for rapid adoption of clean energy and energy efficiency to benefit people, the economy, and our planet. In service of our mission, IREC advances scalable solutions to integrate clean energy resources, including solar, energy storage, electric vehicles, and smart inverters, onto the grid safely, reliably, and affordably. IREC supports the creation of robust,

competitive clean energy markets, though IREC does not have a financial stake in those markets. IREC's team includes policy experts, lawyers, and electrical engineers who are well versed in the procedures and technical standards for interconnecting clean energy to the electric power system. Drawing on that knowledge, IREC works across numerous diverse states to improve the rules, regulatory policies, and technical standards that enable the streamlined, efficient, and cost-effective interconnection of solar, storage, and electric vehicle charging infrastructure. IREC has extensive experience with state interconnection procedures and has helped to refine and improve interconnection procedures across the United States. IREC closely monitors and tracks the development of best practices in interconnection policy, with a focus on both the procedural and technical aspects of interconnection.

III. IREC COMMENTS AND RESPONSES TO THE COMMISSION'S QUESTIONS

On December 18, 2025, the Commission opened Docket No. L2025-3059032 to consider regulatory revisions to modernize the process for connecting distributed generating resources, storage, and new load. Docket No. L2025-3059032 presents a critical opportunity for the Commission to modernize utility load interconnection requirements to accommodate for the growing demand for large loads, including medium-heavy duty electric vehicle (MHD EV) charging, while ensuring utilities are held accountable for delivering timely, transparent, and predictable interconnection processes.

Regionally[1] and nationally,[2] Pennsylvania has been identified as a critical state for developing key corridors to support MHD EVs. Additionally, state agencies—including the

[1] National Grid et al., "*Northeast Freight Corridor Charging Plan: Roadmap Report*" (National Grid, October 2025), https://www.nationalgrid.com/document/566386/download.
[2] Joint Office of Energy and Transportation, "*National Zero-Emission Freight Corridor Strategy*" (US Department of Energy, September 2024), https://driveelectric.gov/files/zef-corridor-strategy.pdf.

Pennsylvania Department of Transportation (PA DOT) and Pennsylvania Department of Environmental Protection (PA DEP)—have established plans and goals to expand EV charging infrastructure across the state. For example, the PA DEP's 2025 Pennsylvania Roadmap to Zero-Emission Vehicles[3] estimates the state may need to add over 30,000 level 2 charging ports and nearly 5,000 DCFC charging ports to meet the growing demand of light duty EVs by 2030. The state is also actively deploying EV infrastructure. Pennsylvania currently leads the nation in NEVI-funded infrastructure deployment, with 29 operational stations and an additional 54 stations in various stages of planning and construction.[4] Overall, significant investment, planning, and stakeholder attention are focused on expanding charging infrastructure for light, medium, and heavy-duty EVs throughout the state.

The rise of transportation electrification, especially MHD electrification, will place tremendous pressure on the utility load interconnection processes and may require states to modernize its regulatory framework around the process. EV charger projects use a massive amount of power, particularly projects designed to charge MHD EVs. For example, highway charging plazas can require up to 5 megawatts (MW) for light duty EVs, while those designed for heavy-duty EVs can easily consume 30 MW of power or more.[5] These load requirements alone would pose a challenge for many utilities, but EV charging projects add a further

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[3] ICF, "*2025 Pennsylvania Roadmap to Zero-Emission Vehicles*" (Pennsylvania Department of Environmental Protection, December 2025), p. 31-33, https://greenport.pa.gov/elibrary/GetDocument?docId=10430349&DocName=2025%20PENNSYLVANIA%20ROADMAP%20TO%20ZERO-EMISSION%20VEHICLES.PDF%20%20%3Cspan%20style%3D%22color%3Agreen%3B%22%3E%3C%2Fspan%3E%20%3Cspan%20style%3D%22color%3Ablue%3B%22%3E(NEW)%3C%2Fspan%3E.

[4] Pennsylvania Department of Transportation, "Shapiro Administration Announces $100 Million for Public EV Chargers in Communities as Pennsylvania Continues to Lead the Nation in NEVI Program," February 19, 2026, https://www.pa.gov/agencies/penndot/news-and-media/newsroom/statewide/2026/shapiro-admin-announces--100-million-for-public-ev-chargers-in-c.

[5] Gideon Katsh et al., *Electric Highways: Accelerating and Optimizing Fast-Charging Deployment for Carbon-Free Transportation*, November 2022, p. 1-2, https://calstart.org/wp-content/uploads/2022/11/Electric-Highways-Study-November-2022.pdf.

complication: timing. In comparison to traditional loads—such as buildings—EV charger projects often operate on compressed development schedules and as a result customers require efficient interconnection timelines to align with vehicle deliveries, satisfy program incentive requirements, and support the relatively short construction periods associated with many EV charging installations. Therefore, a transparent, predictable, and comprehensive framework for load interconnection is vital for deploying EV chargers. While Pennsylvania's load connection rules do not yet reflect such a framework, the state has an incredible opportunity to make meaningful improvements and streamline the interconnection process.

As will be discussed further in the responses below, Pennsylvania's load interconnection processes need a significant overhaul to ensure timely and cost-effective integration of the next generation of load projects. While the utility responses to the PUC's April 19th data request revealed some details about their processes, load interconnection steps, timelines, costs, and other vital information has largely been a black box to customers and the public. The utility responses also highlighted major inconsistencies across each utility's load interconnection process. These inconsistent practices and the overall lack of transparency make it difficult for customers—such as EV charger owners—and other stakeholders to understand and navigate the interconnection process. The Commission has an opportunity to create clear requirements and accountability measures to ensure utilities deliver timely interconnections, creating more certainty around the state's ability to support increasing transportation electrification and deliver affordable solutions. In these comments, IREC outlines the major opportunities the Commission has to make meaningful and achievable improvements to the state's load interconnection rules.

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

The Commission should establish a statewide framework for how utilities receive, review, study, communicate, and process requests for new or expanded electric load. The load interconnection process is important because Pennsylvania is expected to see significant increases in load in the coming years.[6] Higher energy demand translates to more load interconnection applications, as customers seek to connect major projects like AI data centers, clean manufacturing facilities, and EV charging depots. Clear, efficient, and reliable load interconnection processes will be essential to managing these applications and ensuring service can be provided in a timely manner.

Pennsylvania's regulations concerning the load interconnection process are referenced in Section 57.19 of Title 52 of the Pennsylvania Code (Line Extensions), which simply require each utility to file its own line extension tariff rather than establish standardized processes across regulated utilities. Those tariffs, however, only outline how utilities extend electric service lines to customers and when customers pay for line extensions. They do not provide any guidance to customers related to the load interconnection process steps, review criteria, study requirements, timelines, costs, or other vital details. As a result, the process is opaque and highly fragmented across the utility service territories.

The utility's responses to the PUC's April 19th data request underscores the stark differences between their load interconnection processes.[7] For example, while First Energy and

[6] Rachel McDevitt, "As more data centers connect to Pennsylvania's electric grid, some worry prices will spike," *Allegheny Front*, July 15, 2025, https://www.alleghenyfront.org/data-centers-pennsylvanias-electric-grid-rates/; Peter Hall, "Regional electricity price hits cap again in latest auction," *Pennsylvania Capital-Star*, July 14, 2026, https://penncapital-star.com/economy/pjm-interconnection-electricity-price-hits-cap-again-in-latest-auction/.
[7] PECO did not provide responses to the April 19th data request but would likely have had different responses.

DPL have two review tiers for load interconnection, PPL has six, and UGI has seven.[8] Furthermore, First Energy and DPL both established clear, but wholly different timelines for distribution and transmission-level load studies, while PPL only provided timelines for transmission-level projects, and UGI offered no study timelines. Establishing state-wide standardized load interconnection procedures would provide transparency and predictability to customers, helping to reduce project risk and costs.

IREC urges the Commission to address foundational process requirements such as standardized application requirements, review tier levels, and review procedures and steps, as well as reasonable review timelines and utility reporting of load interconnection timelines. Additionally, the Commission should implement or address more advanced solutions such as load hosting capacity analysis (HCA) maps, pre-application reports, online portals, flexible load interconnection, a penalty framework, coordinated review of co-located load and generation, and proactive distribution upgrades (discussed below).

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

Regulations should primarily be based on anticipated distribution system impacts and operational flexibility, as these are better indicators of the infrastructure requirements needed to accommodate a new load than customer class alone. While interconnection voltage may serve as an initial indicator of potential system impacts, it should not be the sole determining factor, as

[8] PPL, Data Request to Gather Information in Connection with Developing Regulations for Interconnecting Loads Docket No. L-2025-3059032, May 8, 2026, https://www.puc.pa.gov/pcdocs/1929595.pdf; First Energy, Data Request to Gather Information in Connection with Developing Regulations for Interconnecting Loads Docket No.: L-2025-3059032, May 6, 2026, https://www.puc.pa.gov/pcdocs/1927870.pdf; Duquesne Power & Light, TUS Data Request, Duquesne Light Company, Load Interconnection Docket No. L-2025-3059032, May 6, 2026, https://www.puc.pa.gov/pcdocs/1927867.pdf; UGI, Data Request to gather information in connection with developing regulations for Interconnecting Loads; Docket No. L-2025-3059032, May 6, 2026, https://www.puc.pa.gov/pcdocs/1927868.pdf.

projects interconnected at the same voltage can have significantly different impacts depending on load size, location, operating characteristics, and available system capacity.

This approach is important as Pennsylvania prepares for increasing electrification of MHD EV fleets. Fleet charging projects may incorporate flexible operating characteristics, including managed charging, which can reduce distribution system impacts. A regulatory framework that is based on engineering characteristics (not customer class) will better suit transportation electrification.

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**.

IREC recommends that the Commission implement standardized tiered review levels for load interconnection requests. Today, the number of review tiers and how they are grouped varies across the Pennsylvania utilities. For example, while First Energy and DPL have two review tiers for load interconnection, PPL has six, and UGI has seven.[9] The utilities base the review tiers solely on service voltage, without considering other factors. The number of review tiers and how they are grouped across the utilities is likely inefficient and should be investigated by the Commission within a formal proceeding.

IREC recommends the tiered review levels be grouped and based on expected system impacts, load size, flexibility characteristics, and anticipated infrastructure requirements. As an

[9] PPL, Data Request to Gather Information in Connection with Developing Regulations for Interconnecting Loads Docket No. L-2025-3059032, May 8, 2026, https://www.puc.pa.gov/pcdocs/1929595.pdf; First Energy, Data Request to Gather Information in Connection with Developing Regulations for Interconnecting Loads Docket No.: L-2025-3059032, May 6, 2026, https://www.puc.pa.gov/pcdocs/1927870.pdf; Duquesne Power & Light, TUS Data Request, Duquesne Light Company, Load Interconnection Docket No. L-2025-3059032, May 6, 2026, https://www.puc.pa.gov/pcdocs/1927867.pdf; UGI, Data Request to Gather Information in Connection with Developing Regulations for Interconnecting Loads; Docket No. L-2025-3059032, May 6, 2026, https://www.puc.pa.gov/pcdocs/1927868.pdf.

example, Nevada Rule 9's distinction between Standard and Non-Standard projects provides differentiated review pathways and timelines.[10] It recognizes that review treatments can vary where projects have different load characteristics, infrastructure needs and risk profiles.

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?**

This is a novel area that will require further discussion with interested stakeholders before it can be resolved. On one hand, there are inherent system benefits to co-interconnecting non-export generation that offset new load, as doing so relieves the strain that the load would otherwise place on the system. On the other hand, if the generation were export-capable, it could exacerbate thermal and voltage constraints on the grid. In that case, expediting the generator's interconnection could be viewed as queue jumping, or arbitrarily advancing a project ahead of others already in the queue, regardless of system impact.

An important caveat is that thermal and voltage capacities are not the only measures of a new generator's grid impact, even if the generator is non-exporting. A key step in the interconnection process is a protection study that determines how generators respond to system faults, during which generator short-circuit currents may be found to impact grid safety. Even so, protection is rarely the constraining factor for DER interconnection; therefore, it is somewhat unclear how significant a concern the expedition of such projects would present in all circumstances.

[10] NV Energy, Rule No. 9, Electric Line Extensions, https://www.nvenergy.com/publish/content/dam/nvenergy/brochures_arch/about-nvenergy/rates-regulatory/electric-rules-north/Rule_09_Electric_North.pdf.

In light of these nuances, IREC recommends that the Commission use this proceeding to consider how the export capability of collocated generation and load could materially affect later-queued projects.

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, digital customer portals should be provided. These portals should allow application submission, tracking, milestone notifications, and should clarify customer and utility responsibilities throughout the process. The utilities should establish the capabilities to track load interconnection steps and timelines so that it can be visible in the portal but also used to meet utility reporting requirements.

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

Hosting capacity maps, pre-application reports, and public load interconnection queues are important tools that can help reduce duplicative or speculative load interconnection requests. Hosting capacity maps and pre-application reports provide customers with detailed information about the grid's ability to host additional load at different locations, while public queues give customers a realistic sense of when their application will be reviewed and help them determine which locations may have limited capacity and thus be more likely to require additional review or grid upgrades. Site control requirements for larger projects could serve as another option to reduce duplicative projects.

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.**

IREC believes that "queue jumping" could be a valuable tool, especially for larger projects, to keep the load interconnection process moving forward. Eligibility criteria could include site control requirements, proof of equipment procurement, and submission of study or grid upgrade deposits. The Commission could also consider a process for load customers to have to keep moving or be asked to "step aside" if they are stalled.

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.**

After project submission, the following information should be provided and automatically updated on the utility's online portal when new information is received or changes occur:

- Queue position
- Study stage
- Expected timelines
- Identified deficiencies
- Upgrade indicators (preliminary)
- Milestone status
- Phased Interconnection options (aka amount of capacity available without upgrades)

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

Yes, IREC recommends the Commission establish prescribed timeframes for completing the various steps in the load interconnection process. However, to understand and inform what is a reasonable timeframe to prescribe for completing each step it is essential to have data on existing timeframes. The utilities should provide historical data on the time necessary to complete each step in the load interconnection process and identify average timelines for each

step, average end-to-end timelines, the total number of projects reviewed, explain outliers, and distinguish between project types. The Commission should use this data on the existing load interconnection timeframes as a benchmark against state electrification or transportation goals. For example, Pennsylvania established a goal to install at least 5,000 new EV charging ports at 2,000 sites by 2028.[11] The Commission could then establish average timelines that ensure or accelerate utility processes to meet such state goals.

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.

Nevada's Rule 9 has established nine load interconnection process timeframes for "Standard" projects that could serve as a worthwhile framework for Pennsylvania:[12]

- **Timeframe 1:** Utility delivers planning memo with preliminary diagram of service connection points, preliminary cost estimate, and a Design Initiation Agreement to Applicant within fifteen (15) business days
- **Timeframe 2:** Applicant returns signed Design Initiation Agreement to Utility within twenty (20) business days
- **Timeframe 3:** Utility notifies Applicant of the identity of the utility's Project Coordinator within three (3) business days
- **Timeframe 4:** Applicant contacts Project Coordinator to request a Pre-Design meeting within sixty (60) business days
- **Timeframe 5:** Utility and Applicant hold a Pre-Design meeting within ten (10) business days
- **Timeframe 6:** Utility delivers an updated cost estimate, binding design, and design approval agreement to Applicant within twenty-five (25) business days
- **Timeframe 7:** Applicant delivers the executed Design Approval Agreement to Utility within twenty (20) business days

[11] "Pennsylvania's Electric Vehicle Mobility Plan," Commonwealth of Pennsylvania, https://www.pa.gov/agencies/penndot/research-planning-and-innovation/electric-vehicles-and-alternative-fuels/electric-vehicle-mobility-plan.

[12] NV Energy, Rule No. 9, Electric Line Extensions, https://www.nvenergy.com/publish/content/dam/nvenergy/brochures_arch/about-nvenergy/rates-regulatory/electric-rules-north/Rule_09_Electric_North.pdf.

- **Timeframe 8**: Utility delivers the Rule 9 Agreement and final cost estimate to Applicant, within ten (10) business days
- **Timeframe 9:** Applicant returns executed Line Extension Agreement and applicable advances to Utility within ninety (90) business days

IREC also recommends the Commission consider timeframes for Application Completeness, Study Process (including Feasibility, System Impact, and/or Facilities studies) and Construction.

d. If an EDC exceeds its expected review timeline, what actions should the EDC be required to take?

IREC encourages the Commission to implement a framework for penalties if the utilities do not meet review timeline compliance. However, in order to determine whether these timelines are met and to impose penalties, the Commission must implement tracking and reporting of these timeline data points. The Commission should require each utility to submit load interconnection timeline reports on a bi-annual or annual basis. In addition to enabling the Commission to establish targets, incentives, penalties, or other enforcement mechanisms to drive utility performance, these tracking and reporting requirements will help the Commission better understand and address customer dissatisfaction and complaints when timelines extend beyond the customers' requested energization date. Tracking and reporting will also help the Commission ensure that the utilities load interconnection processes are aligning with the state's building electrification or transportation goals, such as PA's goal to energize at least 5,000 new EV charging ports at 2,000 sites by 2028.[13]

[13] "Pennsylvania's Electric Vehicle Mobility Plan," Commonwealth of Pennsylvania, https://www.pa.gov/agencies/penndot/research-planning-and-innovation/electric-vehicles-and-alternative-fuels/electric-vehicle-mobility-plan.

Once the Commission implements tracking and report requirements, it could then establish a penalty framework. California and Colorado's approach to non-compliance could serve as useful examples. Resolution M-4846 in California is a comprehensive enforcement policy adopted by the CPUC in November 2020.[14] It promotes maximum compliance with CPUC rules and requirements by establishing PUC staff enforcement actions and a Penalty Assessment Methodology.[15] One staff enforcement action is the citation program. It establishes a pre-determined penalty amount for non-compliance that is applied without case-by-case adjudication of individual circumstances and those penalties are administratively issued by CPUC staff under the Commission's delegated authority. Colorado took a slightly different tact than California. The state adopted language in its Revised Statutes that specify penalties for utilities that fail to adhere to commission-established timelines:

> *If a retail electric utility fails to provide timely service and adhere to timelines that the commission establishes as part of the commission's interconnection rules, the retail electric utility may be subject to penalties of up to two thousand dollars per day for each day that the violation occurred.*[16]

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

IREC recommends that generation and load interconnection requests remain in separate queues, however, there could be a process in which impacts are evaluated in a more coordinated manner to expedite co-located systems. Given their inherent benefits to electrification and

[14] CPUC, Resolution M-4846, Resolution Adopting Commission Enforcement Policy, November 5, 2025, https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/safety-and-enforcement-division/documents/m-4846.pdf.
[15] "CPUC Adopts Comprehensive Enforcement Policy," Ellison Schneider Harris Donlan, November 2020, http://eslawfirm.com/blog/cpuc-enunciates-comprehensive-enforcement-policy.
[16] Colorado Revised Statutes Title 40. Utilities § 40-2-135

system reliability, the Commission should explore opportunities to increase process efficiency for the interconnection of co-located load and generation systems.

One potential option would be the development of a coordinated review study option that could be requested within the load queue for planned co-located generation and load projects. This option would allow such projects, for an additional study fee, to preserve their existing positions in both the load queue and the generator interconnection queue while undergoing a coordinated review.

Under this option, the proposed co-located project would undergo a series of additional screens designed to determine whether the generation component would have a material impact on other generation projects queued ahead of it. These screens would build on the existing interconnection study framework but be tailored to assess the incremental impact of pairing generation with load at a single point of interconnection. Notably, only non-exporting generators would qualify for this process to limit the potential for material impact.

If the screens indicate that the generator would not have a material impact on higher-queued projects, the co-located generation could proceed with an expedited interconnection without the delays typically associated with joining the back of the generation queue. Conversely, if the screens reveal that the generator's export capability would create meaningful grid impacts, the project would be subject to standard queue procedures, ensuring that projects with genuine system impacts are not permitted to bypass others based solely on their co-located status.

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**.

Exigent circumstances can be built into any penalty framework, where you track averages or provide a "dead band", that recognizes that these circumstances will arise but shouldn't be used as an excuse for every project.

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

Yes, Pennsylvania utilities should be required to provide load hosting capacity maps. Pennsylvania is lagging far behind other states in this respect. Load or EV Hosting Capacity maps are made available in at least 16 states throughout the country.[17] The PA utilities should build upon its existing experience with hosting capacity and distribution system transparency. The question now is not whether hosting capacity information has value, but rather how to evolve existing tools and practices so they better support modern load interconnection decisions, including electrification.

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?**

- **Improve siting decisions:** Hosting capacity maps allow customers to identify areas with available capacity, avoid constraint locations, and reduce unsuccessful applications
- **Reduce speculative requests:** Hosting capacity maps serve as an early screening stage before queue entry, which reduces duplicative applications, speculative projects and unnecessary studies
- **Improve utility efficiency:** Where hosting capacity maps guide feasible projects to connect, utility's personnel time is not wasted on reviewing infeasible requests

[17] "U.S. Atlas of Electric Distribution System Hosting Capacity Maps," U.S. Department of Energy, last modified July 2025, https://www.energy.gov/cmei/vehicles/us-atlas-electric-distribution-system-hosting-capacity-maps.

- **Streamline review:** Good hosting capacity maps could ultimately be used to radically expedite application review for projects that do not pose impacts
- **Unlock grid capacity:** Hosting capacity maps could be leveraged to develop limited load profiles[18] to get projects online with existing capacity while awaiting upgrades

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

IREC does not view hosting capacity as creating undue concerns when implemented appropriately. But the commission should focus on ensuring that hosting capacity maps provide meaningful and actionable information to customers, including:

- Providing clear updated user guides and FAQs that communicate technical assumptions, limiting criteria. Without this context, customers may misinterpret the results
- Providing hosting capacity information at nodal level granularity to support meaningful decisions, and reduce speculative requests
- Promoting a reasonable level of consistency across utilities in map content and functionality to provide a predictable customer experience across the state
- Maintaining a meaningful cadence of map update (at least monthly)

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.

The following elements should be considered[19]:

- **Spatial Granularity -** Hosting capacity maps should be provided at a nodal level rather than feeder level averages. Minimum locational information should include: Nodal level hosting values, Substation locations, and Primary distribution line information

[18] Gwen Brown, "CPUC Decision on 'Limited Load Profiles' Offers Important Solution for Faster EV Charger Rollout in California", Interstate Renewable Energy Council, February 5, 2026, https://irecusa.org/blog/irec-news/cpuc-decision-on-limited-load-profiles-offers-important-solution-for-faster-ev-charger-rollout-in-california/.
[19] Sky Stanfield, Yochi Zakai, and Matthew McKerley, *Key Decisions for Hosting Capacity Analyses*, Interstate Renewable Energy Council, September 2021, https://irecusa.org/resources/key-decisions-for-hosting-capacity-analyses.
Adarsh Nagarajan and Yochi Zakai, *Data Validation for Hosting Capacity Analyses*, National Renewable Energy Laboratory, April 2022, https://irecusa.org/wp-content/uploads/2022/04/Data-Validation-for-Hosting-Capacity-Analysis-Final.pdf.

- **Substation and Equipment information -** Hosting capacity maps should include: Substation locations, Substation transformer kVA/MVA ratings, and Transformer voltage class
- **Constraint transparency -** Hosting capacity maps should identify the limiting criteria evaluated by HCA, including: Thermal, Voltage, and Protection limitations
- **HCA methodology transparency and user guidance -** The utilities should publish supporting documentation and user guides that describe HCA map methodology, definitions of technical criteria and accompanied technical thresholds, assumptions, known limitations and treatment of queued projects
- **Maps features and user functionality -** Maps should support: address search, filtering and toggling between load and DER hosting capacity map views, downloadable outputs, and queued overlays
- **Temporal hosting evolution -** Where feasible utilities should transition hosting capacity maps from static snapshots toward: temporal hosting analysis, seasonal hosting visibility, and flexible interconnection opportunities, however, deployment should not be delayed waiting for fully mature capabilities
- **Update frequency -** Hosting capacity maps should be updated regularly, with monthly as the expected minimum
- Downloads and other basic accessibility and usability considerations

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

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?

Yes, Pennsylvania utilities should be required to publish public load interconnection queues. This tool gives customers a realistic sense of when their application will be reviewed and helps them determine which locations may have limited capacity and thus be more likely to require additional review or grid upgrades. As a result, it can improve customer siting decisions and reduce more time-intensive reviews, costly system upgrades, and the number of speculative interconnection requests.

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.

The public load interconnection queue should be updated monthly, posted on the utility's website, and include specific data points for each project in the queue. Best practice is for utilities to provide this data in a sortable spreadsheet format that allows users to sort the data by substation and feeder.

17. Additional Comments - Proactive Distribution Upgrades

Pennsylvania's current challenging interconnection environment for both load and generation presents a unique opportunity for the Commission to build lasting momentum toward accelerated DER adoption and load electrification through proactive distribution upgrades.

` Proactive distribution upgrades represent a growing area within integrated distribution planning efforts nationally, in which grid investment decisions are informed not only by current reliability needs but also by anticipated future interconnection and energization bottlenecks. Using adoption and energization forecasts, utilities can upgrade grid infrastructure ahead of capacity needs, with the costs of these upgrades shared proportionally among all beneficiaries of the new capacity as they interconnect. The result is shorter interconnection timelines and significantly lower development risk, driven by greater cost certainty.

Reactive approaches alone will not be enough to accelerate interconnection over the long term. The PUC should seize this critical moment to establish proactive distribution upgrade proceedings, following the models already in place in Massachusetts[20] and Minnesota[21].

IV. CONCLUSION

IREC appreciates the opportunity to comment on the July 4th Secretarial Letter and for the Commission's attention on these issues. We look forward to continuing to work with stakeholders in Pennsylvania to help modernize, standardize, and streamline load interconnection processes in the state.

Sincerely,

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[20] Massachusetts Department of Public Utilities, Electric Sector Modernization Plans Order Findings (D.P.U. 24-10/24-11/24-12), September 19, 2025, https://www.mass.gov/info-details/electric-sector-modernization-plans-order-findings.

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