



July 24, 2026

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

**Re: Docket No. L-2025-3059032: Comments of Calibrant Energy and Camus Energy on Potential Regulations for Interconnecting Electric Loads**

Dear Secretary Homsher:

Please find attached comments of Calibrant Energy (Calibrant) and Camus Energy (Camus) in response to the Pennsylvania Public Utility Commission's (Commission) June 22, 2026 request for comment on potential regulations governing the interconnection of electric loads. We appreciate the Commission's continued efforts to ensure that new load is integrated in a manner that enables economic growth, preserves reliability, and fairly apportions costs.

Calibrant and Camus look forward to continuing to work with the Commission and other interested parties to achieve these goals.

Respectfully submitted,

Judith Judson  
Executive Vice President of Regulatory and Policy  
Calibrant Energy

Anthony Harrison  
Vice President, Policy and Strategic Partnerships  
Camus Energy

**Comments of Calibrant Energy and Camus Energy in the Matter of  
Potential Regulations for Interconnecting Electric Loads; Docket No. L-2025-3059032**

**I. Introduction**

Calibrant Energy (Calibrant) and Camus Energy (Camus) (together, Joint Flexible Interconnection Parties) offer the following comments in response to the Public Utilities Commission's (Commission) questions on electric load interconnection issued June 22, 2026.

Calibrant is a distributed energy company dedicated to providing “energy-as-a-service” solutions to commercial, industrial, and institutional customers in North America. Our solutions include the origination, development, ownership, and operation of an array of distributed energy technologies, including battery storage, solar photovoltaics, linear generators, and microgrids.<sup>1</sup> Calibrant previously offered comments relevant to large load interconnection in Docket No. M-2025-3054271, themes of which remain relevant to the Commission's analysis of interconnection rules in the instant proceeding.<sup>2</sup>

Camus provides grid management and flexible interconnection software to large load customers, such as data centers, and electric utilities across the United States. Camus's FlexConnect platform enables transmission providers and load-serving entities to evaluate, plan, and operationally manage flexible grid connections for large loads, including data centers, by analyzing time-varying grid capacity across all 8,760 hours of the year using utilities' own network models, SCADA data, and planning tools, and by coordinating firm and conditional firm service in day-to-day operations.<sup>3</sup>

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<sup>1</sup> Calibrant is owned by Macquarie Asset Management, the world's largest infrastructure asset manager, through the Macquarie Green Energy Transition Solutions (MGETS) fund.

<sup>2</sup> Comments of Calibrant Energy in the Matter of Pennsylvania Public Utility Commission's En Banc Hearing Concerning Interconnection and Tariffs for Large Load Customers, Docket No. M-2025-3054271, June 5, 2025.

<sup>3</sup> Camus has co-authored publicly available research, including a first-of-its-kind study with, Google, Encoord, and Princeton University's ZERO Lab using transmission system data from a PJM-area utility, demonstrating that flexible grid connections and bring-your-own-capacity arrangements can materially accelerate large load

Joint Flexible Interconnection Parties appreciate the Commission's ongoing efforts to develop tariffs and procedures that enable the interconnection of large loads in a manner that enhances economic growth, system reliability, and ratepayer benefit. As the record in Docket No. M-2025-3054271 demonstrates, data center-driven load growth warrants interconnection procedures that can accommodate the unique scale and operating characteristics of these loads. Joint Flexible Interconnection Parties agree with the Motion of Vice Chair Barrow that a review of Pennsylvania's rules governing the interconnection of new generation should also consider methods to improve regulatory clarity for customers seeking to interconnect new load.<sup>4</sup> Informed by extensive work with large load customers, Joint Flexible Interconnection Parties recommend that standardizing and structuring requirements for the interconnection of flexible loads warrants priority attention.

## **II. Responses to Select Commission Questions**

### **Q1. What electric load interconnection issues should be addressed via regulation?**

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

A1. Joint Flexible Interconnection Parties recommend, foremost, that rules governing the interconnection of new and expanded load affirmatively enable the *flexible* interconnection of that load.<sup>5</sup> For most hours of the year, the transmission and distribution system operates with excess capacity. By reducing withdrawals from the grid during the limited number hours of

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interconnection timelines while protecting reliability and preventing cost shifts to other customers. Camus Energy, Encoord, Princeton University Zero Lab, "Flexible Data Centers: A Faster, More Affordable Path to Power," December 2025, available at [www.camus.energy/flexible-data-center-report](http://www.camus.energy/flexible-data-center-report) (Flexible Data Centers Report).

<sup>4</sup> Motion of Vice Chair Kimberly Barrow, Revisions to Interconnection Rules, Public Meeting of December 4, 2025.

<sup>5</sup> Flexible interconnection refers to the interconnection of loads capable of reducing withdrawals during periods of system constraint. Loads may achieve this flexibility by managing operations to lower demand, by dispatching onsite or proximate storage or generation, or by a combination of the two. As used in these comments, "flexible loads" includes resources with or without co-location arrangements, behind-the-meter generation, or electrically proximate storage or generation.

system constraint that trigger the need for grid upgrades, a flexible load can interconnect more quickly and at lower cost than a load with firm interconnection of similar magnitude.<sup>6</sup> This approach improves the utilization of existing grid infrastructure and can benefit all ratepayers by distributing fixed system costs over a larger volume of energy sold. As such, flexible interconnection is among the most potent tools available to the Commission to allow Pennsylvania to host new large loads on the timelines those investments require, while optimizing the use of existing infrastructure and protecting ratepayers from new costs.

Large load customers can only realize accelerated “speed-to-power” and other benefits of a non-firm interconnection if utility interconnection and system planning procedures account for that load flexibility. Whether customers adopt flexible arrangements depends on their ability to anticipate how investments in relevant controls, onsite storage, or other enabling technology will affect study treatment and interconnection timelines. Defining common standards for flexible interconnection in Commission rules is appropriate to deliver predictability, uniformity across utilities, and transparency to customers.

Recent FERC orders emphasize the importance of accommodating load flexibility in the interconnection of large loads, including flexible loads not co-located with generation. Commission rules should follow this direction in defining relevant state-jurisdictional procedures. Joint Flexible Interconnection Parties recommend that the Commission consider rules that complement any updates to the PJM Tariff adopted in response to the Show Cause Order issued June 18 in Docket No. EL26-67-000.<sup>7</sup> At minimum, Commission rules must ensure

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<sup>6</sup> Flexible Data Centers Report at pages 5-6.

<sup>7</sup> Federal Energy Regulatory Commission, Order Instituting Proceeding Under Section 206 of the Federal Power Act, Docket No. EL26-67-000, June 18, 2026 (Show Cause Order).

that utility tariffs do not undermine or foreclose streamlined pathways to interconnection for flexible large loads.

Lastly, Joint Flexible Interconnection Parties recommend that Commission rules define flexible interconnection to encompass the breadth of load management capabilities available today, not a simple “on/off” construct. Legacy interruptible tariffs generally contemplate binary interruption: the customer either drops to a firm service level or does not. Modern large loads are capable of far more granular response, and the grid conditions that flexibility is meant to address rarely require complete curtailment. A definition confined to binary interruption will understate available flexibility, underutilize latent grid capacity, and will exclude response modes most beneficial to large load customers and most useful to system operators.

**Q2. Should regulations concerning load interconnection be formulated and applicable by customer class, interconnection voltage or tariff rate?**

A2. Joint Flexible Interconnection Parties support differentiating interconnection procedures based on load size and interconnection voltage, which can generally be approximated by customer class. As with the interconnection of generation, a tiered structure is appropriate to account for differences in the scale and complexity of review required for small and large loads. A tiered structure can also streamline procedures to accommodate affected system operator review applicable to larger loads.

**Q3. 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.**

A3. As described in response to Question 4 below, Joint Flexible Interconnection Parties recommend that Pennsylvania's interconnection procedures provide an expedited process for the study of flexible large loads.

**Q4. 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?**

A4. Yes. Where generation and load are developed at a single site or in close proximity and are electrically configured such that the generation offsets the load's withdrawals, the two should be studied together under common planning standards and on a common schedule.<sup>8</sup>

Importantly, Pennsylvania's interconnection rules should provide an expedited process for the review and interconnection of *all* flexible loads, whether co-located with generation or not. The key consideration should be the applicant's demonstrated ability to limit withdrawals to avoid or defer grid upgrades that would warrant more extensive study or system upgrades. This load flexibility may arise from co-located generation; it may equally arise from customer-sited storage, from workload orchestration and other load management, or from a combination of measures. Accounting for flexible loads that are not paired with co-located generation is consistent with FERC's directives on transmission-level interconnection in the June 18, 2026, Show Cause Order.<sup>9</sup>

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<sup>8</sup> See, Show Cause Order at paragraph 94, which describes electrically proximate loads in the context of transmission-level interconnection.

<sup>9</sup> *Ibid.*, at paragraphs 85-87.

**Q9. What if any protocols should be in place for circumstances where an applicant can jump ahead in the queue?**

A9. Joint Flexible Interconnection Parties recommend that large loads with a demonstrated and enforceable ability to manage and curtail load in a manner that avoids system upgrades should receive the highest priority in a load interconnection queue.<sup>10</sup> Joint Flexible Interconnection Parties offer the following principles to guide the development of policy that assigns priority to flexible loads:

- Accelerated interconnection of flexible loads confers broad benefit. The deployment of large, flexible loads contributes to the state’s economic development and can apply downward pressure on rates by increasing grid utilization without triggering system upgrades. Enhanced priority for flexible loads encourages customers to invest in innovative solutions to grid constraints that better utilize the existing grid infrastructure, including efforts to “bring their own” new battery storage and generation capacity.
- Without prioritization, flexible loads may be trapped behind firm loads that require major system upgrades. A flexible load that is studied and configured to operate within the headroom available at a given point of interconnection should not be required to wait years for a queued-ahead project to complete the upgrades necessary only for the interconnection of that firm load. This delay undercuts a foundational benefit of studying flexible load in the first place.

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<sup>10</sup> Recently enacted legislation in neighboring states provide examples of efforts to prioritize the interconnection of flexible large loads. Maryland House Bill 1532 creates a voluntary Clean Capacity Rating program that rewards data centers that bring new clean capacity to cover peak demand. New Jersey Senate Bill 731 prioritizes the interconnection of large data center customers that make binding commitments to flexibility.

- Prioritization requires enforceable commitment. Expedited interconnection for flexible loads should be conditioned upon customer agreement to defined operating parameters, development milestones, measurement and verification provisions, and reasonable remedies for non-performance. Such enforcement is appropriate to prevent adverse impact to other customers in queue or that have commenced operation.
- Transparency. A prioritization structure should be codified in rule and reflected in public queues, with the basis for the priority identified, to ensure other applicants understand their position.

**Q11. 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.**

A11. Joint Flexible Interconnection Parties encourage the Commission to consider minimum requirements for the data and other information the utility must provide to enable an applicant to appropriately size a flexible interconnection. An applicant cannot design a load management strategy, size a battery, or price a curtailment commitment without an understanding of the obligations applicable to that load. Joint Flexible Interconnection Parties recommend that Commission rules require the utility to deliver, within study results, a description of flexibility requirements including, but not limited to:

- The constraint or constraints driving the flexibility requirement.
- The conditions in which flexibility would be required and a forecast of how frequently flexibility would be required and the expected duration of each event.

- Required depth of reduction relative to the non-firm capacity, expressed as a maximum permitted withdrawal during events.
- Notice lead time for planned events and/or enhanced transmission capacity utilization, and required response time for emergency events
- Curtailment priority and ordering relative to other flexible loads, to demand response resources, and to firm load shed.
- Measurement, verification, and telemetry requirements, including the baseline or envelope against which performance will be assessed.
- Expected lifetime of the requirement: whether and when planned system investment is expected to relieve the constraint.

**Q13. Should there be separate queues for both generation and load interconnection requests? Why or why not?**

Joint Flexible Interconnection Parties recommend that there be an interconnection queue process for new load requests that provide flexibility, including loads with behind-the-meter generation and storage. As discussed in our response to Question 4, where generation and load are developed at a single site or in close proximity and are electrically configured such that the generation offsets the load's withdrawals, these resources should be studied together in a single queue process, thereby enabling an expedited pathway to interconnection (see response to Question 9).

Additionally, at minimum, Commission rules should ensure that generation-only interconnection requests do not pose a bottleneck to the interconnection of flexible loads. While load interconnection and generation interconnection requests involve similar engineering and

planning resources, they are subject to different volume drivers. Generation queues in PJM and elsewhere have experienced application volumes that bear little relationship to the number of projects that ultimately reach commercial operation. Load interconnection applicants should not inherit the resulting delay.

Joint Flexible Interconnection Parties recommend coordination and shared visibility between load and generation queues, including to enable generation co-located with load and electrically proximate generation to proceed to interconnection on a timeline aligned with the interconnection of a new or expanded load.

### **III. Conclusion**

The Commission's consideration of rules governing large load interconnection is timely. As FERC and PJM work to refine the wholesale framework governing the service and interconnection of flexible large loads, the Commission can develop rules enabling this flexibility for transmission-level interconnections and extending relevant mechanisms to distribution-level interconnections. Joint Flexible Interconnection Parties respectfully urge the Commission to prioritize this flexibility in its efforts to modernize the Commonwealth's interconnection rules.

Joint Flexible Interconnection Parties thank the Commission for the opportunity to provide these comments.