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E-File

July 24, 2026

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17120-3265

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

Dear Secretary Homsher:

Enclosed for filing please find the Comments of PPL Electric Utilities Corporation in the above-captioned proceeding. These Comments are being filed pursuant to the June 22, 2026 Secretarial Letter issued by the Pennsylvania Public Utility Commission.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on July 24, 2026 which is the date it was filed electronically using the Commission's E-filing system.

If you have any questions regarding these Comments, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michael J. Shafer", is written over a light blue, stylized graphic that resembles a signature or a set of lines.

Michael J. Shafer

Enclosure

cc via email: Darren Gill

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

PPL Electric Utilities Corporation (the “Company” or “PPL Electric”) does not believe additional load interconnection regulations are generally necessary. Pennsylvania utilities already have a statutory obligation to provide reasonable, safe, and non-discriminatory service to customers requesting interconnection within their service territories and maintain robust processes to evaluate and serve new load. There are adequate processes in place for applicants to seek relief at the PUC if EDCs fall below these standards in interconnecting customers.

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

The Company does not believe that regulations should be applied based on customer class, interconnection voltage or tariff rate because each utility has different tariff rates, customer class breakdowns, and ways of categorizing system voltage levels. Instead, any differentiation in regulations should be based on the size of the customer's load.

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- 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.**

PPL Electric does not support regulations that establish fixed review levels or load-size thresholds for load interconnection requests. However, many EDCs, including PPL Electric, have internal review procedures based on the size of the customer request. The scope of review is based on the characteristics of each project, its potential system impacts, and customer-specific requirements. EDCs should retain the flexibility to determine the studies and analyses necessary to evaluate requests and provide reliable service.

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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?

PPL Electric Utilities supports efforts to quickly bring generation online to support increasing demand. While coordination should be expected and encouraged, in Pennsylvania's restructured environment, generation and load are often separate and discreet processes even with co-location.

The Company does not believe a separate expedited process is necessary or appropriate for co-located generation. It should be noted that PPL Electric does not have an interconnection queue for load requests. Additionally, generation and load interconnection requests require different reviews and may proceed on different schedules. Each application may have critical path items that are outside of the Company's control which will make coordinating the timing of the interconnection difficult or impossible. As an example, a generation interconnection may have a delay based on supply chain constraints while the load interconnection is delayed because of right-of-way acquisition. These unrelated delays may prevent the coordinated interconnection envisioned by this question.

For customers connecting at 69 kV or above, behind-the-meter generation intended solely to offset the customer's load and not to export to the grid is reviewed as part of a coordinated interconnection application process with the load request. The size and characteristics of the generation relative to the load may require additional technical analysis and could result in requirements beyond those associated with the load alone.

If the generation has the capability to export power to the grid, it is subject to the PJM interconnection process and associated PJM review requirements and timelines. In those circumstances, the overall project timeline is influenced by factors outside of the Company's control, and an expedited utility process would be unlikely to accelerate the interconnection.

For customers connecting below 69 kV, the Company does not support exceptions to established generation interconnection procedures for co-located projects. Generation interconnection requests at this level typically are participating in net metering. Net metering interconnections are subject to existing regulations and are processed through strict queuing procedures. Creating an expedited path for co-located projects could have unintended negative consequences to other customers in the generation interconnection queue. The Company is concerned that such an approach could undermine the fairness and efficiency of the interconnection process.

Accordingly, the Company believes its existing processes provide sufficient flexibility to review co-located load and generation projects on an appropriate timeline while maintaining safe and reliable service, without the need for exceptions for an expedited process.

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- 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.**

PPL Electric believes online portals can benefit load interconnection applicants, but they should not be mandated for every application type. Utilities should have flexibility to select the most effective intake process based on the request's type, complexity, and voltage level. However, the Company's existing online portal, used primarily for single-phase residential customers and distributed energy resources, has proven beneficial.

Potential benefits of an online portal include improved speed and accuracy of information provided by applicants, reduced internal processing time, more efficient document management, and improved customer experience.

Potential drawbacks include the cost and time required to develop, implement, maintain, and periodically update a portal. In addition, highly customized large commercial, industrial, and transmission-connected load projects often require direct coordination between customers and utility personnel, which may limit the value of a standardized portal for certain applications.

Accordingly, the Company believes applicants should have access to efficient methods for submitting applications and supporting information, but utilities should retain flexibility regarding how those processes are implemented.

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

PPL Electric does not view duplicative applications submitted to multiple electric distribution companies as a significant issue requiring regulatory intervention. For clarity, PPL Electric only reports in its large load forecasts load for which the Company has a signed Letter of Authorization (LOA). Those LOAs move quickly to Electric Supply Agreements (ESA) that come with a 10-year commitment from the applicant.

Further, customers evaluating potential locations for new facilities may have legitimate reasons to explore service options from more than one utility.

To the extent the Commission seeks to discourage speculative applications, possible approaches could include requiring applicants to provide robust project information, demonstrate site control, meet reasonable development milestones, or reimburse utilities for the costs of performing engineering reviews and studies. However, no single measure will eliminate duplicative applications, particularly for large projects where multiple sites may remain under consideration during the early stages of development.

The Company believes any such requirements should be carefully balanced to avoid understating potential new load growth. While there are risks to overstating load growth, there is also the need to provide accurate signals to the market so adequate generation can be built to serve new load requests.

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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?

PPL Electric does not believe requiring an application fee based on the level of review would necessarily be effective in minimizing duplicative projects submitted to multiple utilities. Customers evaluating multiple potential locations for a project may have legitimate business reasons for doing so, and application fees alone may not deter duplicative submissions.

PPL Electric does not maintain a formal load interconnection queue, although the Company generally seeks to process applications in the order they are received while accounting for project-specific circumstances. As such, the concept of paying a fee to establish a queue position does not align with the Company's current load interconnection process.

Many large-load developers have substantial financial resources, making application fees an unlikely deterrent to duplicative submissions. However, soon after the application phase a large-load customer moves into the letter of authorization ("LOA") phase for more detailed engineering which requires a deposit to cover Company costs. After the LOA phase the large-load customer is required to sign an Electric Service Agreement ("ESA") which carries with it significant minimum load guarantees and other security obligations. At the point the customer has decided to enter into an ESA the significant commitments make it unlikely that it has submitted a duplicative application.

If the Commission determines that fees are appropriate, they should primarily be designed to recover a portion of the costs incurred in evaluating an application rather than to discourage project development. The Company believes project-specific information requirements, demonstration of project readiness, and reasonable development milestones may be more effective tools for discouraging speculative requests than application fees alone.

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- 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.**

The Company does not support regulations that require projects to advance based on prescribed milestones. PPL Electric does not maintain a formal load interconnection queue, although it generally seeks to process applications in the order they are received, while accounting for project-specific circumstances. Unlike the generation interconnection queue, load applications are generally not dependent on other applications to come online as a prerequisite of taking service. Rather, load applications can proceed on parallel paths and take service when the particular customer is able.

Utilities should retain flexibility to prioritize work based on project readiness, system needs, equipment and material availability and customer requirements. The Company therefore believes utilities should retain discretion to evaluate project readiness holistically rather than through mandated milestones. Each load interconnection project has unique characteristics, particularly for connections at the transmission-level, where materials and equipment often must be engineered and ordered for a specific customer location or use.

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

PPL Electric does not believe additional protocols are necessary to allow applicants to move ahead of other projects. The Company does not maintain a strict load interconnection queue, and therefore there is generally no opportunity for applicants to "jump ahead" of other projects.

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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?

b) What payment methods should EDCs accept?

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

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

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

While customers often pay certain fees early on during their project timelines, the Company does not currently charge initial application fees for load interconnection requests and has historically sought to support economic development by minimizing barriers to customers considering investment within its service territory. However, perspectives regarding the appropriate allocation of costs associated with interconnection studies continue to evolve, particularly as the size and complexity of some load requests increase.

- a. The Company does not support a Commission-established fee schedule. If fees are adopted, they should reflect the complexity of the required review and, where appropriate, recover applicable and appropriate costs from the customers driving those costs. Limiting load interconnection fees to larger load customers (as defined by the specific utility) would help avoid unintended barriers for smaller commercial, industrial, and small business customers seeking service at transmission or distribution voltages.
- b. Utilities should retain flexibility regarding accepted payment methods. Electronic payment options should generally be available, but specific payment requirements need not be prescribed by regulation.
- c. The Company does not believe regulations should dictate whether administration fees may be charged for electronic payments. Utilities should have the ability to recover reasonable transaction costs where appropriate.
- d. To the extent fees are implemented, they should generally bear a reasonable relationship to the costs incurred in evaluating an application. The Commission may wish to consider whether certain customer-specific review costs are most appropriately recovered from the projects driving those costs, while balancing broader policy objectives related to economic development and customer affordability.
- e. Additional oversight of application fees is not necessary. Utility fees are already subject to Commission oversight through existing tariff and ratemaking processes,

which provide an appropriate mechanism for reviewing the reasonableness of any such charges.

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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.

The Company believes all applicants should receive timely updates regarding the status of their interconnection request through the communication method established between the utility and the applicant. Information provided should generally include confirmation that the application has been received, notification of any missing information, the status of engineering reviews or studies, and updates regarding significant milestones or changes in expected timelines.

PPL Electric does not maintain a formal load interconnection queue and therefore does not believe queue position is a meaningful metric for load interconnection requests. Instead, communications should focus on the status of the applicant's project and any information needed to support the continued review of the request.

The Company provides applicants with key points of contact and expected timelines for application review and response. In addition, the Company's engineering and interconnection personnel frequently communicate directly with applicants throughout the review process, and updates are provided upon request. Utilities should retain flexibility to communicate with customers in a manner appropriate for the size, complexity, and stage of each project while providing sufficient transparency regarding the status of the interconnection request.

The Company would note that all EDCs are subject to the requirement to provide safe, reasonable and adequate service. PPL Electric believes these standards require fair treatment to applicants while accounting for unique project aspects. This approach more appropriately accounts for specific project applications rather than creating prescriptive one size fits all requirements.

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

- 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.**
- b) What is a reasonable timeframe to complete a load interconnection application review?**
- c) What timeline should exist for EDCs to complete the review of collocated load and generation requests, if any?**
- d) If an EDC exceeds its expected review timeline, what actions should the EDC be required to take?**

The Company does not support prescribed timelines for load interconnection reviews. Review timelines vary based on project size, system conditions, voltage class, required studies, customer responsiveness, PJM involvement, permitting, material availability, and construction requirements. As a result, a uniform set of timelines may not be appropriate for all projects.

- a) For load interconnections below 69 kV, the review process may include application review, engineering analysis, system modeling, design, customer coordination, invoicing, and construction. These reviews identify issues such as overloads, voltage violations, flicker, phase balancing, and required system upgrades. PPL Electric maintains internal guidelines and expected timeframes for key milestones, but actual durations vary by project. For load interconnections at 69 kV and above, the Company targets completion of the system impact study and issuance of study results within approximately 60 days of receiving a complete application.
- b) The Company does not believe there is a single reasonable timeframe for all load interconnection requests. Some projects can be evaluated quickly, while others require more extensive engineering analysis, transmission studies, PJM coordination, or system upgrades.
- c) For co-located load and generation projects, timelines should depend on the characteristics of the generation. Behind-the-meter generation intended solely to offset customer load can generally be reviewed in coordination with the load request, while exporting generation may be subject to PJM timelines outside the utility's control.
- d) If an EDC exceeds an expected timeline, it should communicate the reason for the delay and provide an updated estimated timeline. The Commission may wish to establish general expectations that utilities act diligently and in good faith, with appropriate remedies available in cases involving gross negligence, unreasonable delays, or a persistent failure to process applications in a timely manner. However,

utilities should not be penalized for delays resulting from project-specific circumstances or factors outside their control.

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

Yes. Generation and load interconnection requests should remain separate. Generation interconnection is governed by established queue-based processes and, in some cases, PJM requirements, while load interconnection requests are evaluated under the Company's obligation to provide service on non-queued basis.

PPL Electric does not maintain a formal load interconnection queue and instead works load requests in parallel in a non-discriminatory manner based on the specific needs and circumstances of each project. Maintaining separate processes avoids unnecessary complexity and allows each type of request to be evaluated using the framework most appropriate to its technical and regulatory requirements.

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- 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.**

The Company does not believe the Commission should prescribe specific remedies or protocols for exigent circumstances. Unexpected developments, additional study requirements, PJM review processes, customer-driven modifications, equipment availability, and other unforeseen events can all affect project timelines.

Utilities should retain flexibility to address these situations on a case-by-case basis and communicate revised timelines and requirements to customers as appropriate.

At the same time, the Commission may wish to establish general expectations that utilities act diligently and in good faith in administering the interconnection process, with appropriate remedies available in cases involving gross negligence, unreasonable delays, or a persistent failure to process applications in a timely manner.

Accordingly, the Company supports broad guiding principles rather than prescriptive requirements and believes utilities should retain discretion to address project-specific circumstances while maintaining safe and reliable service. The Company would note that all EDCs are subject to the requirement to provide safe, reasonable and adequate service. PPL Electric believes these standards require fair treatment to applicants while accounting for unique project aspects. This approach more appropriately accounts for specific project applications rather than creating prescriptive one size fits all requirements.

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

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

No. The Company does not believe EDCs should be required to provide hosting capacity maps for either generation or load interconnection. Utilities should retain flexibility to provide customer information in the manner that best fits their systems and customer needs. The Company believes direct engagement with customers and project-specific feasibility reviews provide more accurate and useful information than publicly available hosting capacity maps.

- a) Hosting capacity maps may provide customers with preliminary screening information when evaluating potential project locations, but they cannot replace project-specific engineering studies or guarantee available capacity.
- b) The primary concerns are cost, accuracy, and security. Hosting capacity maps are expensive and time-consuming to develop and maintain, particularly without highly automated systems, and any requirement should allow for full recovery of associated costs. Publishing detailed infrastructure information may also create security concerns. In addition, system conditions are constantly changing, meaning capacity shown on a map may not reflect actual conditions when a project is studied.
- c) If hosting capacity maps are provided, they should clearly communicate that the information is preliminary and subject to detailed engineering review. Utilities should retain flexibility regarding update frequency, displayed information, and map functionality, while protecting confidential and security-sensitive information.

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

No. The Company does not believe EDCs should be required to publish a public list of load interconnection projects. Unlike generation interconnection, PPL Electric does not maintain a formal load interconnection queue and instead works load requests in parallel in a fair and non-discriminatory manner. As a result, queue position is not a meaningful metric for load interconnection requests.

- a) A public list could provide some transparency regarding the volume and status of load interconnection activity. However, given the project-specific nature of load interconnection reviews, the value of such information may be limited. Additionally, the Company is required to share annual load forecasts with the Commission.
- b) The primary concerns are customer confidentiality, security, administrative burden, and potential misinterpretation of the information. Even if customer names and locations are removed, details such as load size, circuit identifiers, and project characteristics could allow interested parties to infer project identities. In addition, public project listings may create confusion regarding project status or available system capacity and generate unnecessary inquiries or disputes.
- c) If public reporting is required, utilities should retain flexibility regarding the information provided, update frequency, and presentation format. Any information published should protect confidential and security-sensitive information and clearly state that project status, timing, and system impacts remain subject to ongoing engineering review.

The Company believes direct communication with applicants regarding the status of their own projects provides more useful and accurate information than a public listing of load interconnection requests.