

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

POTENTIAL REGULATIONS FOR : Docket Number L-2025-3059032
INTERCONNECTING ELECTRIC LOADS :

COMMENTS OF TALEN ENERGY CORPORATION

AND NOW COMES Talen Energy Corporation (“Talen”), in response to the Pennsylvania Public Utility Commission’s (“Commission”) June 22, 2026 Secretarial Letter, published in the Pennsylvania Bulletin on July 4, 2026, seeking comments from all interested parties regarding the possibility of the Commission promulgating regulations for interconnecting electric loads, including large loads, in the above-captioned proceeding (the “Secretarial Letter”), to file these comments with the Commission.

Talen is a leading independent power producer and energy infrastructure company that owns and operates nearly 16 gigawatts of power infrastructure in the United States, including 2.2 gigawatts of nuclear power and a significant dispatchable fossil fleet. Talen produces and sells electricity, capacity, and ancillary services into wholesale U.S. power markets, including and primarily in the PJM Interconnection Regional Transmission Organization (“PJM”). Talen owns 9,140 megawatts of installed generating capacity in the Commonwealth of Pennsylvania, making it the second largest generation owner on an installed-capacity basis. Formed in 2015, Talen boasts a diverse fuel generation portfolio, comprised of approximately 69% natural gas, 6% coal, and 25% nuclear. Talen employs 1,447 workers in the Commonwealth; 44.8% of these employees are members of respective labor unions. Talen’s Pennsylvania portfolio and investments within the Commonwealth since its formation in 2015 demonstrate a commitment that integrates carbon-free

generation with a responsible transition, which prioritizes maintaining a reliable and affordable power system.

Talen submitted comments to the Commission on July 23, 2025 in the En Banc Hearing Concerning Interconnection and Tariffs for Large Load Customers proceeding, at Docket Number M-2025-3054271. In these prior comments, Talen advocated for an all-of-the-above approach to resource adequacy and ensuring a grid that supports developing technologies and emerging industries, including by allowing the free market to best control prices and incentivize investment in new generation.

Talen responds in more detail below to the questions set forth in the Secretarial Letter concerning the Commission's consideration of potential regulations for the interconnection of electric loads, including large loads:

Question 1

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

Talen supports a pro forma approach to regulations for interconnecting large loads that could reflect how PJM has approached generation interconnection. Talen would encourage the Commission to enact well-developed rules, including specific timeframes for projects and form agreements, similar to PJM's Interconnection Service Agreement. Such an approach should include requisite flexibility for customers, while reducing risk for the utility and transmission organization. Talen additionally suggests that the Commission set specific technical and reliability specifications that the customers must meet to ensure consistency and uniformity in application and to ensure certainty in project development requirements. Specific requirements on time to service should be established to allow customers to plan. Further, customers should be permitted to self-build, and customers should be permitted to utilize a collaborative approach to construction

where the customer may have existing equipment or wish to provide resources to lower the cost or expedite construction.

Question 2

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

Yes, Talen supports a progressively more fulsome regulatory structure as load increases in size, interconnection complexity, and the scale of the project.

Question 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.

Yes, Talen recommends that the review for loads should be scaled based on size due to the potential impact to the electric grid that would increase with size. Loads of 50 MW or less should have a fast-track interconnection process similar to small generators. Loads between 50 and 250 MW should receive a medium level of scrutiny, while loads greater than 250 MW should be subject to a full review. Additionally, any load interconnection that requires system upgrades should have a higher standard of review.

Question 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?

Yes, Talen suggests that there should be an expedited interconnection process for generators that interconnect at the same time as corresponding load. That said, an expedited generator process should not slow down the speed with which loads are interconnected. In particular, in areas where excess capacity may exist or the load ramp is less steep, the load should be able to proceed at its own schedule.

Question 5

Some electric distribution companies (EDCs) provide online portals for the interconnection of distributed energy resources. Should the same be provided for load-interconnecting applicants to submit all applications and supporting documents? Please list the benefits or drawbacks.

Yes, Talen submits that a standard application along with response deadlines should be available. Applications should come with a deposit requirement that would (a) be used toward construction cost, (b) returned if the customer's stated cost and time to connect exceeds needs, and (c) forfeited 120 days after the customer receives interconnection feedback from the transmission organization.

Question 6

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

Talen suggests that applicants could be required to demonstrate some level of site control; to satisfy study fees and network upgrade credit posting requirements, analogous to those now required by PJM for generator interconnections; and to include an officer certification attesting to whether there are multiple applications pending with different EDCs.

Question 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?

Yes, Talen encourages a higher bar for applications to ensure that the applicant is real, which includes higher fees. Fees and credit postings for load interconnection will ensure that the EDCs only need to analyze real projects, thereby limiting the drain on EDC resources and helping speed up the process for real projects.

Question 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.

Yes, Talen agrees that certain projects should be able to move ahead of other projects in the queue based on establish criteria. This would include: (1) time to first load, (2) demonstration of load construction, major equipment, or construction contract, (3) upfront financial security, and (4) contract with end-use customer, if different than applicant.

Question 9

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

Talen suggests the following protocols should be in place for circumstances where any applicant can jump ahead in the queue: (1) locked in commitment to load start date, (2) demonstration of commitment to load construction, (3) local zoning approval, (4) completed environmental and other studies, and (5) customer financial wherewithal.

Question 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?*

- (a) Yes, Talen suggests that a fee should be required for load sizes above 100 MWs.
- (b) EDCs should accept payment by ACH, wire, or check.
- (c) Yes, EDCs should allow for electronic payments without administration fees.

(e) The transmission organization should be required to provide a source and use of all funds.

Question 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.

Talen suggests that the EDC should provide to the applicant the load study, information on the customer and rate case impacts, the cost to interconnection, the time to connect with phases included if necessary, and project management point of contact. Talen further suggests that EDCs should commit to semi-monthly project review meeting and a monthly financial report on the use of any funds obtained from the applicant.

Question 12

Should there be prescribed timelines and timeframes for completing the various steps in the load interconnection application review process?

Talen recommends that a reasonable timeframe to complete a load interconnection review is seventy-five (75) days. Talen further recommends that EDCs should complete their review of collocated load and generation requests in ninety (90) days.

Question 13

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

Talen supports separate queues for generation and load interconnection requests because the information required will be different. For example, the generation queue will likely have all or nearly all of its capacity come online at a certain time, while load interconnection is more likely to ramp up over time.

Question 16

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

Talen supports a list of projects, as suggested in this question, but the list should be separated or categorized based on the status of each project. There should be certain thresholds the project must achieve to move on to a new category—for example, conceptual design, load study completed, deposit made, executed construction service agreement, executed energy service agreement, load construction started, and related phases of the project.

Talen thanks the Commission for the opportunity to submit comments in this proceeding and Talen commends the Commission for its consideration of stakeholder input in the process of developing potential regulations for interconnecting large loads. Talen looks forward to working with the Commission and other stakeholders to address the issues raised in the Secretarial Letter and generally to ensure reliable and cost-effective power in the Commonwealth.

Respectfully submitted,



David P. Zambito (PA ID No. 80017)
William A. Lesser (PA ID No. 332951)
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
Telephone: (717) 703-5892
Facsimile: (215) 989-4216
E-mail: dzambito@cozen.com
E-mail: wlesser@cozen.com
Counsel for *Talen Energy Corporation*

Dated: July 24, 2026