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To the Public Utility Commission,
Attn: Secretary
Commonwealth Keystone Building
2nd Floor, 400 North Street
Harrisburg, PA 17120

Re:
Potential Regulations for Interconnecting Electric Loads; Doc. No. L-2025-3059032
[56 Pa.B. 3865]

To the Public Utility Commission,

We are writing as a regular resident who cares about fair electric bills, reliable power, and smart growth in our communities. We support stronger, clearer rules for how very large electricity users (like data centers and big industrial projects) connect to the grid. Right now, it feels like the system can be gamed by speculative projects that tie up utility time, drive up costs, and leave regular customers holding the bill if those projects never actually get built.

Below are the changes we hope you will adopt.

1. What needs to be regulated

The Commission should set clear rules to stop "queue shopping" and fake or duplicate projects. Specifically, please require:

- Proof that a project really controls the land and has real financing before it gets deep in line.
- Honest disclosure if the same developer has filed similar requests with other utilities or in other states.
- Clear definitions so companies can't split one big project into many small ones to avoid scrutiny.
- Studies that look at the full requested load first, before counting any on-site power the company says it will add later.
- Strong milestones with real consequences if a project stalls or disappears. •

Public reporting of the queue so communities can see what's coming. • Notice

to local towns and counties when a big project is proposed nearby. • A fair process for complaints and appeals.

These rules would protect ratepayers from subsidizing private industrial projects, cut down on unnecessary studies, and make sure utilities aren't planning expensive infrastructure based on projects that may never happen.

Also, please make it clear that getting in line or even signing an interconnection agreement does **not** equal zoning approval, does **not** give a developer a right to build, and does **not** override local land-use laws.

2. Who the rules should apply to

The rules should be based on how much power a project wants and how it affects the grid—not on what the company calls itself. A data center shouldn't get a lighter review just by calling itself a "warehouse," but a non-data-center project with the same grid impact shouldn't get a break either. Same impacts should mean same rules.

3. Tiered review based on project size

Yes, please use a tiered system so small projects aren't held up by huge speculative ones. A simple approach could be:

- **Up to 500 kW:** Basic screening, unless there's a known local issue.
- **500 kW to 5 MW:** More detailed review of local equipment, voltage, meters, and power quality, with a study deposit.
- **5 MW to 20 MW:** Detailed local review plus a check on cumulative and transmission impacts.
- **20 MW to 50 MW:** Full coordination between local and transmission systems, stronger financial guarantees, public queue updates, and detailed studies.
- **50 MW and above (or 100 MW combined):** The strictest level, with cluster studies, firm milestones, public reporting, and strong financial protections.

Pennsylvania's 50 MW/100 MW thresholds are a good starting point, but smaller projects should still get extra review if they're big for that particular area or feeder.

Related phases, parcels, or affiliated companies should be counted together. Developers

shouldn't be allowed to break one big project into pieces just to get a lower level of review.

4. On-site generation next to the load

If a project says it will add its own power generation on site, that should only count if it's real, permitted, financed, and enforceable—not just an idea. The utility should study multiple scenarios, including:

- The full load with no on-site generation.
- The generation by itself.
- Normal combined operation.
- What happens if the generation goes down.
- What happens if the load suddenly drops.
- Startup, shutdown, islanding, and emergency conditions.

Being “collocated” should allow coordinated review, not automatic approval or special priority.

5. Online filing portal

An online portal is a good idea, but it should be designed for oversight, not just convenience. It should:

- Time-stamp everything and keep version control.
- Show study status, milestones, invoices, and what's still needed.
- Allow secure public and confidential views.
- Have strong cybersecurity and a backup way to file if the system is down.

Without proper screening, deposits, and identity checks, a too-easy portal could encourage more speculative filings.

6. Stopping duplicate and speculative projects

Please require:

- A sworn statement listing all similar filings.
- Proof of land control.

- Nonrefundable filing fees and increasing deposits as projects grow.
- A statewide project ID so utilities and PJM can match related requests.

Developers can file alternate sites if they're fully disclosed and marked as "either/or," but only one should count as a firm commitment at a time. Hiding related requests or lying should lead to removal from the queue, loss of priority, repayment of costs, and penalties.

7. Fee to hold a queue position

Yes, there should be a fee to hold a spot in line, increasing with project size and complexity. But a fee alone won't stop well-funded speculators. It should come with:

- *Verified land control.*
- Disclosure of duplicate filings.
- Study deposits and escalating financial security.
- Firm milestone deadlines.
- Responsibility for costs caused by withdrawal.

Nonrefundable amounts should reflect real costs, not be arbitrary penalties.

8. Moving in line by meeting milestones

Projects should move forward only by hitting clear, verifiable milestones that show they're real and ready, such as:

- Land control.
- Final financing.
- Signed engineering agreements.
- Real progress on permits.
- Deposits posted.
- Demonstrated readiness to build.

Media announcements, political pressure, or vague promises of jobs and taxes should not matter. The system should be “first ready, first served,” but never at the expense of reliability or by shifting costs to others.

9. Rules against “queue jumping”

If someone is allowed to move ahead in line, it should require:

- Utility verification.
- Notice to affected parties.
- A short window for protests.
- A written explanation of why the milestone justifies the move.

Queue jumping, if allowed at all, should be rare and never based on favoritism or competition between utilities. Missed milestones should be documented, with a chance to fix issues where appropriate, and the public queue should be updated. There should be a quick way to complain to the Commission if something seems unfair.

10. Application fees

Yes, projects that need engineering review should pay application fees scaled to their size and complexity. Payment should be easy (electronic and standard methods); with no hidden convenience fees, and fees should reflect actual processing costs.

- Fees should start at 500 kW or any lower level that needs more than ordinary design.
- They should increase at meaningful thresholds like 5 MW, 20 MW, and 50 MW.
- Deposits should be reconciled to actual costs, with unused money returned.
- ACH and electronic checks should have no extra fee; card fees should be limited to actual pass-through costs and disclosed up front.
- The Commission should review fee schedules to make sure they're reasonable, published in tariffs, and not used to block ordinary customers while letting large projects off easy.

11. Clear information after a project applies

Once a project applies, the utility should provide, through a secure online portal:

- Queue position and completeness status.

- What study stage it's in and expected timelines.
- Any deficiencies and next steps.
- Review level, study costs so far, remaining deposit, and any dependencies on other projects.
- Preliminary upgrade needs, PJM coordination status, milestone deadlines, and reasons for any delays.

When a big request is accepted as complete, the host county and town should be notified within five business days, with basic info like requested load, general project type, voltage, expected energization year, and whether new substations or transmission may be needed—while protecting truly confidential details.

12. Enforceable timelines

Yes, please set firm deadlines. Predictable timelines help everyone plan and prevent inactive projects from sitting in line forever.

Suggested timeframes:

- Completeness review: 10 business days.
- Deficiency notice and cure period: 15 business days, paused only while the applicant responds.
- Scoping meeting: within 15 business days after the application is complete. •

Initial technical screening: 20 business days.

- Feasibility and system-impact studies: typically 60–90 calendar days, done at the same time where possible.
- Facilities and cost study: typically 45–60 calendar days, coordinated with earlier studies.
- Draft interconnection agreement and final security requirements: within 30 calendar days after the final study.

Overall, a complete large-load application should be resolved within about six months, with extensions only for applicant-caused delays or extraordinary system issues. If the utility is late, it should:

- File a written explanation and revised schedule.
- Not automatically approve service just because it's late.

- Refund a portion of the study fee for each 90-day period beyond six months, without passing those costs to other customers.
- Report delays over 30 days to the Commission with a corrective plan.

Collocated load and generation should be reviewed together only when both are complete and the generation is real and enforceable, ideally within the same six-month maximum.

13. Separate queues for load and generation

Yes, keep separate queues for large load requests and for power plants, since they raise different issues. But when they share a site, owner, substation, or other key element, they should be coordinated. The utility should track how one affects the other, and no linked load should move faster than the utility can confirm reliable service.

14. Exceptions for urgent situations

Limited extensions should be allowed only when clearly necessary, with notice and a revised schedule. Examples: unexpected system constraints, changes in standards, need for more studies, or missing applicant information—not just developer impatience. Extensions should usually be capped at 90 days at a time, and anything beyond 180 total days should require Commission approval. Queue position should continue only if the applicant maintains land control, financial security, and milestones.

15. Hosting capacity maps

Yes, but only if they are conservative, regularly updated, and clearly labeled as informational—not a promise that service is available. These maps can:

- Show constrained feeders and substations before applications are filed.
- Help towns and utilities plan better and avoid wasting resources on clearly infeasible locations.
- Improve public understanding of where development pressure is concentrated.

Concerns include security, data misuse, and developers using maps to speculate on land. To address this:

- Avoid publishing sensitive asset-level details.

- Include update frequency, confidence limits, aggregated queued load, clear filters, and a correction process.
- Use generalized capacity ranges, show the date and method of the last update, and update at least monthly with quarterly utility certification.
- Provide more detailed, protected information to the Commission and affected towns under security safeguards.

16. Public queue list

Yes, there should be a public list of large load interconnection projects, with protections for owner identity and exact location where needed. This helps expose speculation, supports accountability, and lets communities see what's being proposed.

The list should show, at minimum:

- Anonymous project number and date accepted.
- Requested gross maximum MW and expected full-build MW.
- Expected load ramp schedule and voltage class.
- Broad project category and study stage.
- Expected completion and energization year.
- Milestone status and any queue-position changes.

Exact parcel and owner info can be withheld when justified, but the host county and town should be public and receive direct notice. The list should be updated within five business days of any material change and at least monthly, with a process to correct errors. Historical records of withdrawn, transferred, or completed projects should remain available for auditing.

Additional protections we strongly support

Please also consider these added safeguards:

- Require full disclosure of all on-site generation, storage, demand response, backup generators, and operating limits. Study the full gross load first; only count reductions when they're permitted, technically qualified, enforceable, and verifiable by meter.
- Allow faster review only for truly flexible or curtailable service and real collocated generation that clearly reduces system impacts without shifting costs or risks to existing customers. Backup diesel or gas should not count as a firm offset just because it's proposed.

- Start with the presumption that facilities and upgrades needed mainly for a large load are the applicant's responsibility. Any cost sharing with other customers should require clear, Commission-reviewable evidence of actual system benefits.
- Require sufficient contributions, collateral, and exit fees (or equivalent security) to protect existing customers from stranded costs if a project shrinks or leaves.
- Make sure large projects do not undermine land preservation, municipal planning, or corridor integrity by forcing unnecessary new lines where existing routes can be reused or upgraded. Require direct notice to towns and clarify that electric approval does not override local land-use authority.
- Require applicants to certify all parent companies, affiliates, developers, financiers, end users, related parcels, common infrastructure, and alternate locations. Related loads should be aggregated, and any changes in ownership, scope, MW, category, or site must be disclosed and reviewed before queue rights are transferred.
- State clearly that queue position is not a property right, not a guarantee of service, not a priority over valid government approvals, and not a vested right under any zoning ordinance.

Closing

For all these reasons, we urge the Commission to adopt the strongest, most protective large-load interconnection framework allowed by law. That means strict thresholds, applicant-funded studies and upgrades, meaningful queue controls, public transparency, planning based on gross load, real flexibility only where it truly reduces system impacts, direct municipal notice, respect for local land-use authority, and solid protections for ratepayers against speculative or abandoned projects.

Thank you for your time and for considering these common-sense protections for future generations, our communities, and our environment.

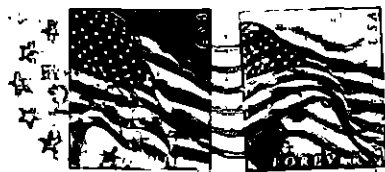
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