Voltus, Inc.
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

Via email: mahomsher@pa.gov and dgill@pa.gov

RE: Potential Regulations for Interconnecting Electric Loads — Docket No. L-2025-3059032 — Comments of Voltus, Inc.

Dear Secretary Homsher:

Voltus, Inc. ("Voltus") submits these comments in response to the Commission's June 22, 2026 Secretarial Letter seeking input on potential regulations governing the interconnection of electric loads, including large loads. Voltus is a demand response and distributed energy resource ("DR/DER") aggregator that contracts with customers to deliver verified demand flexibility into PJM and other wholesale markets.

Voltus's central recommendation is that Pennsylvania's load interconnection regulations, where they create provisions that are specific to large loads, should be built around a single organizing principle: the review, fee, and queue treatment a large load receives should be matched to whether the load has a verified solution in place that addresses the specific grid impact it creates.

A large load's grid impact is not uniform. It depends on the load's own size, ramp, and shape, and on the part of the system it connects into. A diverse range of solutions exist to address these different impacts, including: on-site generation, self-owned storage, workload or operational flexibility, and contracted DR/DER flexibility from a third-party. These solutions can address different aspects of a load's impact and resolve different constraints. What should determine a load's regulatory treatment is not which of these solutions it has chosen, but whether the specific solution in place is verified to address the specific impact the load creates.

This is the direction the load interconnection process is already moving at the federal level, particularly for large loads. FERC's June 18, 2026 show cause orders (PJM: Docket No. EL26-67-000) found PJM's tariff may be unjust and unreasonable because it lacks provisions to handle large-load growth efficiently, and directed PJM to propose new flexible transmission service products and expedited interconnection pathways for loads and generation that provide flexibility. FERC's own reasoning for these products is that requiring a load to take full firm service *"may in some circumstances result in costly and inefficient transmission system buildout that may not be necessary"* if the load can instead take a service, or bring a solution, that addresses the actual constraint with less new infrastructure. That is a solutions-matching principle, and Pennsylvania's regulations should apply the same principle across the large load interconnection scenarios its questions cover.

New Jersey's A796, enacted in June 2026, illustrates how a state can apply this principle in practice for large loads: it requires utilities to develop a voluntary demand-reduction trade program under which large data center customers may contract directly with a third party for verified demand flexibility, and treats that contracted flexibility the same as self-curtailment for transmission and capacity-value purposes. Pennsylvania has an opportunity to apply the same solutions-matching logic in their load interconnection processes, and to do so in a way that complements, rather than duplicates or conflicts with, whatever PJM proposes in response to its August 17, 2026 show cause deadline.

Voltus's responses to the Commission's questions follow.

1. What electric load interconnection issues should be addressed via regulation?

The Commission should address how any specific large load interconnection framework identifies the actual grid constraint a large load creates and matches it to a verified solution, regardless of whether that solution is owned by the load or delivered by a contracted party. Interconnection frameworks that differentiate only by asset ownership risk directing capital toward physical build-out in situations where a contracted solution could resolve the same constraint faster and at lower cost.

2 & 3. Should regulations be formulated and applicable by customer class, interconnection voltage, or tariff rate? Should load interconnection requests have different review levels based on load size?

Voltus recommends the Commission consider the load size and interconnection voltage definitions emerging from FERC and PJM (50 MW+, single site, above 69 kV). A single, consistent threshold avoids conflicting standards that would be practical barriers for load interconnection.

4. If generation is collocated with the load, should there be an expedited process for the generation to be interconnected at the same time as the load?

Yes, and the same expedited process should be available to a load that secures a solution that mitigates its impact, including through a contract with a third-party DR/DER provider. The underlying question is the same in both cases: does the load have a solution in place that addresses its grid impact by the time it interconnects? A physically collocated generator answers that question one way; a verified DR/DER contract can answer it just as reliably. For example, if a new large load will create the need for new transmission and generation capacity, a large load can meet those needs by contracting for PJM-accredited capacity. It can meet distribution system needs by collaborating with the utility to develop a solution for DR/DERs to provide distribution services. New Jersey's A796 reflects this equivalence directly, directing utilities to develop a program under which large data center customers may contract with a third party for verified demand flexibility on par with self-curtailment for transmission and capacity-value purposes. Pennsylvania's interconnection timing rules should apply the same test: expedite the load wherever its grid impact is verifiably addressed, not only where the addressing asset happens to sit behind the same meter.

Voltus appreciates the Commission's attention to these issues and welcomes the opportunity to discuss these comments further.

Yours sincerely,

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Voltus, Inc.