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Formal Comment Draft

Before the Pennsylvania Public Utility Commission
In re: Electric Load Interconnection Questions
Comments of [Commenter]

[Commenter] respectfully submits these comments urging the Commission to adopt a large-load interconnection framework that protects rural, agricultural and conservational zones along with farmland, established communities, township and municipal planning authority, electric reliability, and ratepayers from speculative industrial development.

The Commission should ensure that load interconnection does not become a mechanism for exporting Pennsylvania power across local boundaries for the benefit of data centers while ordinary Pennsylvanians absorb the costs, congestion, and land-use impacts.

Large-load requests should be treated as exceptional, not routine. The burden should rest on the applicant to demonstrate that the project is real, financeable, sited responsibly, capable of on-site or behind-the-meter generation where feasible, and fully responsible for all direct and indirect costs it causes.

Question-by-question responses

1. Issues that should be regulated

The Commission should regulate speculative queue submissions, study standards, deposits, cost allocation, milestone enforcement, site-control verification, disclosure of on-site generation plans, treatment of co-located resources, and restrictions on duplicative filings across multiple utilities or states. Regulation is beneficial because it prevents ratepayers from subsidizing private industrial load, reduces unnecessary studies, and preserves land and infrastructure by ensuring that only serious projects advance.

2. Basis for applicability

Regulations should apply primarily by load size, then by voltage and service characteristics where relevant, due to the magnitude of grid impacts—not the applicant's preferred tariff label—should drive scrutiny. Customer class should not be the controlling factor if a project's physical impacts are the same, and the Commission should expressly apply the strictest standards to data centers and similar high-density, high-demand facilities.

3. Review levels by load size

Yes. A tiered review structure is necessary to prevent large speculative projects from consuming utility time and queue capacity. A preservation-oriented framework could be:

- Level 1: under 5 MW, abbreviated review.
- Level 2: 5 to 20 MW, standard review with deposits.
- Level 3: 20 to 50 MW, enhanced review and financial security.
- Level 4: 50 MW and above, mandatory cluster/open-season review, full cost responsibility, and strict milestone controls.
- Pennsylvania's 50 MW individual and 100 MW aggregate large-load thresholds provide a defensible benchmark for the highest level of review.

4. Collocated generation

If generation is collocated with load, the Commission should require a synchronized review only where the generation is real, committed, and sufficient to materially reduce system impacts. The rule should not reward paper generation, future promises, or vague "backup" arrangements that exist only to accelerate access to the grid. Any expedited treatment should require simultaneous filing, proof of site control, enforceable financing, and binding operational commitments.

5. Online portal

Yes, but the portal should be designed for regulatory control, not convenience alone. The benefit is that it centralizes filing, reduces administrative error, and creates a reliable record for review and enforcement. The drawback is that a permissive portal may facilitate speculative filings unless paired with completeness screening, identity verification, and meaningful deposits.

6. Discouraging duplicative projects

The Commission should require sworn disclosure of all substantially similar filings, proof of site control, nonrefundable filing fees, escalating deposits, and a prohibition on simultaneous queue placement for materially identical projects absent disclosure and approval. A duplicative filing should result in loss of priority and possible forfeiture of deposits, because queue shopping imposes real costs on utilities and other customers.

7. Fee to establish queue position

Yes. A queue-position fee should be required and should rise with project size and review complexity. This is one of the most effective ways to deter speculative filings, since projects with no genuine commitment are less likely to tie up scarce interconnection resources if they must pay meaningful upfront costs.

8. Queue movement by milestones

Yes, but only for objective, verifiable milestones that show a project is real and ready to proceed. Relevant criteria should include site control, final financing, signed engineering agreements, permitting progress, deposit posting, and demonstrated readiness to build; irrelevant criteria should include media announcements, political pressure, or speculative economic forecasts. The Commission should favor projects that are most likely to be completed, not merely proposed.

9. Protocols for queue jumping

Any queue advancement should require utility verification, public notice to affected parties, a short protest period, and a written finding explaining why the milestone justifies advancement. If queue jumping is allowed at all, it should be narrowly limited to prevent abuse and should never be based on mere applicant preference or inter-utility competition.

10. Application fees

Yes. The Commission should require application fees for large-load requests, scaled to size and complexity, and should require applicants to bear the administrative burden they create. Payment should be accepted electronically and by other standard methods, but the Commission should prevent hidden convenience charges and ensure fees reflect actual processing costs rather than arbitrary markups.

10(a) Threshold and scaling

The fee should begin at 5 MW and increase materially above 20 MW and again above 50 MW, where projects become most likely to require major system upgrades and lengthy studies. The Commission may also require larger refundable deposits for projects above 50 MW or projects seeking expedited service.

10(b) Payment methods

Accept ACH, wire transfer, check, and electronic payments. The process should be standardized statewide so applicants cannot manipulate timing or evade financial scrutiny.

10(c) Electronic payments without fees

Yes, where administratively feasible. If an electronic payment fee is imposed, it should be limited to the actual third-party processing cost and disclosed upfront.

10(d) Cost alignment

Yes. Application fees should track the utility's real processing costs and expected study burden so the public is not forced to subsidize private industrial expansion. Cost causation should be the governing principle.

10(e) Oversight of fees

Yes. The Commission should review fee schedules for reasonableness, require tariff publication, and prohibit arbitrary or discriminatory charges. Oversight is necessary to prevent utilities from using fees as a barrier for ordinary customers while still preserving strict large-load accountability.

11. Information after submission

The EDC should provide queue position, completeness status, study stage, expected timeline, deficiencies, next required actions, and notice of any requested supplemental data. This information should be provided through a secure online portal with automatic updates at each status change and at least monthly while the application is active.

12. Timelines

Yes. The Commission should require enforceable deadlines because delays often benefit speculative applicants while harming the public and existing customers.

12(a) Steps and timeframes

- Completeness review: 15 to 30 days.
- Initial screening: 30 to 60 days.
- Feasibility or screening study: 60 to 90 days.
- System impact or detailed study: 90 to 180 days.
- Facilities or upgrade study: 90 to 180 days.
- Final agreement and security posting: 30 to 60 days.

12(b) Overall review time

A complete large-load application should ordinarily be resolved within 6 months, with tolling only for applicant-caused delay or extraordinary system issues. Pennsylvania's model tariff expressly uses a six-month study completion framework, with a refund mechanism if the utility is late.

12(c) Collocated load and generation

Collocated load and generation should be reviewed on a synchronized basis only when both components are complete and the generation is enforceable in fact, not just in concept. The Commission should not allow incomplete generation promises to delay load review indefinitely or to mask the true infrastructure burden.

12(d) If the EDC is late

The EDC should be required to file a written explanation, revised dates, outstanding data requests, and a status report to the Commission and applicant. Late review should not result in automatic service approval, because reliability and public cost protection must remain paramount.

13. Separate queues for load and generation

Yes. Separate queues are appropriate because large-load requests and generation interconnections raise different technical, legal, and cost questions. They should only be coordinated where a co-located project truly functions as a single integrated system, and even then the load should not advance faster than the utility can confirm safe service.

14. Exigent circumstances

The Commission should allow narrowly tailored extensions only on a documented showing of necessity, with notice to affected parties and a revised milestone schedule. Examples include discovery of system constraints, changes in governing standards, need for additional studies, or missing applicant information, but not generalized developer impatience or speculative schedule pressures.

15. Hosting capacity maps

Yes, but only if they are conservative, frequently updated, and not treated as a commitment that service is available. Such maps can help prevent overbuilding and can direct development away from constrained territory, preserving land and reducing needless studies.

15(a) Benefits

Hosting capacity maps can expose constrained feeders, substations, and transformer areas before applications are filed, which helps protect land-use planning and avoids wasted utility resources. They also improve public understanding of where development pressure is concentrated and where it should be resisted.

15(b) Concerns

The main concerns are security, data misuse, and the risk that developers will use the maps to target the weakest parts of the system for maximum expansion. The Commission should avoid publishing sensitive asset-level details that could compromise reliability or invite strategic speculation.

15(c) Considerations

Maps should include update frequency, confidence limits, aggregated queued load, clear filters, a correction process, and explicit disclaimers that the map is informational only. They should also show identified constraints and be designed to support local planning rather than industrial overreach.

16. Public queue list

Yes, the Commission should require a public list of load-interconnection projects, but it should protect owner identity and precise location where necessary. Public queue disclosure helps expose speculative demand, supports accountability, and allows municipalities and residents to understand what is being proposed in their territory.

16(a) Benefits

A public queue list showing queue position, size, and circuit identifier would help prevent hidden speculation and make clear how much capacity has already been claimed. It would also support local governments and ratepayers who need visibility into the scale of pending industrialization.

16(b) Concerns

The concern is that too much detail could reveal confidential business plans or exact siting information that encourages land speculation or creates security risks. The list should therefore be transparent enough for oversight but not so detailed that it becomes a map for aggressive development.

16(c) Timing and format

The list should be updated monthly or upon material status changes, and the Commission should require a complaint/correction process for errors. It should include filters by utility, size, and status, while preserving confidentiality where necessary.

Requested policy additions

The Commission should go further than the current questions and require the following:

- Large loads should be required to justify why they cannot self-supply more of their power on site before seeking service from the distribution system.
- The Commission should favor on-site generation, behind-the-meter generation, storage, and demand flexibility over new long-distance power importation for data centers.
- The Commission should prohibit rate recovery for any costs that would not have been incurred but for the data center or other large load.
- The Commission should require full contributions in aid of construction, collateral, and exit fees sufficient to protect existing customers from stranded costs.
- The Commission should require that large-load projects not undermine Pennsylvania land preservation, municipal planning, or corridor integrity by forcing unnecessary new lines where existing routes can be reused or upgraded instead.

For the foregoing reasons, the Commission should adopt the most protective large-load interconnection framework permitted by law, with strict thresholds, mandatory applicant-funded studies and upgrades, meaningful queue controls, public transparency, and a clear preference for on-site generation and ratepayer protection over speculative industrial expansion.

Carol Zaruba 7/24/26

Please protect the people who live on the properties that you are taking/using to support Developers their interests

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