

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Technical Conference on Large Computational Load Cost Allocation

Docket No. M-2026-3065062

PRE-CONFERENCE COMMENTS OF K. JACQUELYN OMOSUNBO OMOTALADE

I submit these comments in my personal capacity as a Pittsburgh-based sustainability executive who has followed Pennsylvania's large-load cost allocation work closely, including the Commission's first-of-its-kind large-load tariff framework adopted in May 2026. The views expressed are my own and do not represent any organization.

Pennsylvania is ahead of the country on this question, and the Commission's framework is the reason. As other states and now Congress consider how to assign the costs that data centers and other very large customers impose on the grid, they are measuring themselves against what this Commission has already done. The comments below offer three observations from following the framework's early life, in the hope they are useful as the Commission prepares for the November 17 technical conference.

1. The framework's test is implementation, and implementation is where the fights are. A model tariff only works if it survives contact with each utility's filing. The details now being contested utility by utility - minimum demand charges, contract terms, and exit fees - are not technicalities. They are the difference between a large-load customer that carries its costs and one that shifts them to households and small businesses through the back door. The Commission's September 10 order directing updated emergency load-control rules recognizes that cost allocation and reliability are the same problem; the same is true of tariff design. I encourage the Commission to treat utility-level implementation as a continuation of the framework docket, not a series of isolated filings, so that a weakening in one territory does not quietly become the statewide standard.
2. Large-load customers respond to certainty more than to cost. The developers now negotiating in Pennsylvania have, in my observation, accepted paying their way when the rules are clear and uniform. What stalls projects is not cost responsibility but ambiguity - about who decides, on what timeline, under which standard. This supports the framework's core premise: binding cost-causation standards do not stop the build-out. It also argues for the Commission to keep the framework uniform across territories, because a patchwork within Pennsylvania would recreate the very uncertainty the tariff resolved.
3. Cost allocation, interconnection, and grid upgrades are one question. The costs at issue are not only generation and capacity; they are the transmission and interconnection upgrades that large loads trigger. The conference should treat interconnection-queue costs and grid-upgrade costs as part of the same allocation question, consistent with how grid operators like PJM actually encounter the problem. Federal proposals now moving in Congress - some binding, some merely asking states to "consider" large-load standards - make Pennsylvania's clarity more valuable, not less. A binding, enforced state framework is the strongest position from which Pennsylvania can engage whatever federal standard emerges.

I appreciate the Commission's decision to hold this conference on the record, and I would welcome the opportunity to expand on any of these points.

Respectfully submitted,

K. Jacquelyn Omosunbo Omotalade 7238 Monticello St Pittsburgh, PA 15208
jomotalade@gmail.com

Dated: September 28, 2026