June 6, 2025

Secretary Rosemary Chiavetta
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Secretary's Bureau
Commonwealth Keystone Building
2nd Floor Room N201
Harrisburg, PA 17120

Re: Interconnection and Tariffs for Large Load Customers, Docket Number: M-2025-3054271

Dear Secretary Chiavetta,

The Better Path Coalition and its partner coalition, No False Climate Solutions PA submit the following comment on Interconnection and Tariffs for Large Load Customers – Docket Number: M-2025-3054271.

Chairman DeFrank began his motion identifying pros and cons of large load customers, including hyperscale data centers. They place significant new demand on the electric grid,he said, yet "represent a tremendous opportunity for the state in terms of jobs, economic growth, technological advancement, and rate stability, in addition to bolstering our national security."

We challenge his assumptions. There is no evidence that inviting large load customers into the state will provide all the benefits he states. For example, large load customers are not great jobs creators. The application for the recently approved air quality permit for the Kratos cryptocurrency center proposed for W. Keating Township in Clinton County asks how many employees will be onsite. The company's response? One. It's not clear if that job will be created.

The Kratos example is not unique. "Data centers have rightly earned a dismal reputation of creating the lowest number of jobs per square foot in their facilities" said John Johnson, chief executive of data-center operator Patmos Hosting.[i]

Pennsylvania's Act 25 of 2021 created the Computer Data Center Exemption Program that allows companies that meet investment and job creation requirements to avoid paying sales and use tax on computer data center equipment. In counties with a population less than 250,000, companies must invest $75 million and create 25 jobs; in counties with a population greater than 250,000, they must invest $100 million and create 45 jobs. There is no requirement that the jobs must be permanent and/or go to locals.[ii]

Chairman DeFrank does not mention the adverse impacts of data centers beyond the demand they put on the grid.

In addition to being energy hogs, data centers use a tremendous amount of water. "Data centres consume water directly for cooling, in some cases 57% sourced from potable water, and indirectly through the water requirements of non-renewable electricity generation," according to a 2021 study. However, the author noted "issues of transparency with less than a third of data centre operators measuring water consumption."[iii]

Data centers are also bad neighbors. Noise pollution affects those who work at data centers with decibel levels that can damage hearing after only a half hour. People who live nearby report "headaches, stress, and sleep disturbance." Wildlife can also be affected, sometimes "forcing them to seek new migration patterns."[iv] Light pollution from data centers adds multiple adverse effects.[1] Exposure to light at night disrupts circadian rhythm of melatonin and may promote breast cancer.[2]

The people of W. Keating Township will have to deal with those impacts and others if the proposed cryptocurrency center goes into operation. There are six households in W. Keating Township. As far as we can tell from the local contacts we have, nobody knows it might be coming. It's probably a safe bet, however, that none of the residents of W. Keating Township have been pining to have a cryptocurrency center next door. The real beneficiaries of the plant, should it be built, will be its owners and investors. It is time to stop making Pennsylvania a sacrifice zone to self-serving business interests.

Although the substance of Chairman DeFrank's inquiry pertains to interconnection and tariffs, we raise these more fundamental issues because the PUC and every other relevant body in our state government should be doing an in-depth study of the impacts before making significant plans to accommodate large load customers.

As we said in our comment on the legislation that would establish the RESET Board, one facet of Governor Shapiro's Lightning Plan, "the demand for data centers has been overblown to pique the interest of investors. Not only is the demand for data centers anticipated to be smaller than current forecasts, the data centers themselves are likely to be smaller. The government should take a more measured approach."[v]

Although we are encouraged by the increasing number of large scale renewable energy projects in Pennsylvania, the state lags behind the rest of the country and must make up a lot of ground. Unfortunately, any gains will be more than cancelled as the state works to attract hyper-scale data centers that operate on natural gas or nuclear energy. Currently, Pennsylvania's solar farms combined produce 562 MW. A 4.5 GW natural gas power plant is planned to power just one data center, Homer City. Three Mile Island is being brought back online to serve Microsoft's 835 MW data center, and Amazon has contracted with Talen's Susquehanna nuclear power plant for 960 MW of capacity.

These are but three examples taken from a much longer list of proposed new projects that will either draw from the grid or power their operations with dedicated natural gas or nuclear power plants. Proponents of the Homer City plant boast that it will be powered by its own natural gas power plant that would be the largest in the country.

Pennsylvania's government must stop approving natural gas projects. The climate crisis is accelerating. It is appalling that our state government pretends either it is not happening or that its meager attempts to nibble around the edges of the problem are adequate.

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[1] The ecologic effects of artificial light are well documented (https://ehp.niehs.nih.gov/doi/epdf/10.1289/ehp.117-a20). Prolonged exposure to artificial light can prevent trees from adjusting to seasonal variation. Light pollution can alter behavior, foraging areas, and breeding cycles of insects, turtles, birds, fish, reptiles and other wildlife in rural as well as urban environments.

[2] The National Cancer Institute estimates that one in eight women will be diagnosed with breast cancer at some time during their life. Known risk factors are attributed to only about 50% of these cases. Meanwhile, between 1973 and 1998 the incidence of breast cancer has increased by 40% (ibid, A26).

The real challenge before PUC is not to figure out how to manage the demands large scale customers pose to the grid, but to do everything in your power to protect the people, the environment, and the planet.

Note on Public Participation

PUC's April 25 press release invited public comments on this docket. However, PUC requires that interested parties submitting comments online register for e-filing. While comments submitted without e-filing are accepted, copied, and shared with the appropriate staff, they are not visible on the docket. In this case, comments gathered by our coalitions and submitted via our corporate account were listed collectively on the docket. The hyperlink goes to a page that says, "PUBLIC COMMENT FILE MAY BE VIEWED IN THE COMMISSION'S FILE ROOM."

We encourage PUC to remove barriers to participation by creating an e-comment option that allows occasional users to submit comments that will be added to the list of documents available for viewing online. In the past several years, we have witnessed changes to the public participation process across many agencies that make the process less transparent than it should be. For example, many government agencies' "public" hearings are conducted by herding people into a space where they wait to be called on one at a time to testify into a tape recorder in another room. Even then, the testimony received is made part of an easily accessible public record. No trips to Harrisburg are required to simply see what commenters had to say.

Our coalitions encouraged people to comment by e-filing,but gave people the additional option of submitting comments that we loaded using our corporate account. In the interest of allowing their comments to be easily accessible, we have provided the list of commenters below with links to their comments.

Karen Elias	Jon Rutter	Carol Anne Donohoe
Tracy Carluccio	Andrew Brletrick	Beatrice Zovich
Susan Quinn	Timothy Seitz-Brown	Michelle Dugan
Phyllis Blumberg	Judy	E. Christopher Payne
Barbara Laxon	Margaret van Naerssen	Peter Presby
Barbara Brandom	Dorothea Leicher	Elizabeth Cates
eric	mary more	Michael Babitch
Hitmar	Maryann Richmond	aggie perilli
Elizabeth Plummer	Kathryn Westman	Joe Wolfgang
Ken Dolsky	AMY MERRITT	Renee Dolney
Jesse Brown	Candice Dusch	jan milburn
Char Esser	Nancy Hemberger	Lloyd Zeiler
Sharon Furlong	Alice Keyes	Baruch Capptauber
Maren Morgan	Bernard Greenberg	Elizabeth Brensinger
Diane DiFante	Laura Horowitz	Doris Loud
Stephanie Myers	John Knapp	Pamela Haines
Erica Walles	Leo Kucewicz	Nathan Eachus
Joyce	Debra Murphy	Susan Babbitt
Gene Hunter	Linda McNair	Tamela Trussell
David Schogel	Smoker	Kevin Long
Barbara Nilsen	Lisa	Joan Farb
Eric Gjertsen	Bonnie Sabbi	Josephine Gingerich
Ronald Gulla	Laurel	Kelly Forest

Richard Jones
Rebecca Roter
Stephanie Ulmer
Catherine Bordner
Lynn Patsiga
Sandy Field
Barbara Malt
Jason Crook
Nancy Tate
Susan Babbitt (2)
Morgan Crawf
Paul Mokhiber
Lll Dd
K Peterson
Yolanda Broad
Stephen Moyer
Diane Wynne
Rev Sandra R Mackie
Stephen Wyman
Ross Frankel
Wanda Guthrie
Suzanne de Seife
Roberta Yaklich
Nancy Chernett
Frank Bartell
Anita Wucinic-Turner
Michael Brandes
Sylvia Valencia
Beverly Graham
Neil Harrington
Ann Dorsey
Tomkiel
Chavez

Ravindra Agarwal
Jill Paulus
Marselys Lucero
Roberta Camp
T.R. Kost
Adrienne Doherty
Andres Fierro
Maureen Leuszler
Madeline Amalphy
Casman
Hayden Walles
Barbara Brigham
Steve Books
Rebecca Roter (2)
Susan Quinn (2)
Renee Dolney (2)
Candice Dusch (2)
William Loftus
Carol Brunner
Matthew Carlson
Elizabeth Terry
Liz Robinson
Phyllis Mercurio
AMY MERRITT (2)
Teresa Caruthers
James Smoker
Lora Snyder
Julie Kascal
Tom Wardell
Richard Tregidgo
Char Esser (2)
Gemma Mears
Diane DiFante (2)

Pam Dillett
Leann Turley
John
Mary (2)
Michele Glick
Leo Kucewicz (2)
Michael Sauers
Mark J. Connolly
Kathryn Westman (2)
Joseph Huber
Brian Dugas
Jon
Lynne Walls
Laura Horowitz
Katherine Thorwart
Laura Mason
Kendall
Lisa Ladd-Kidder
Dominic Galante
Michael Schmotzer
Kelly Paal
Andrew Dietrich
Fermin Morales
Laura Fake
Nicole Zeiler
Rebecca Roter (3)
Walter Tsou
Jeanne G Fee
Helen Ortmann
Julia Nakhleh
Lloyd Zeiler (2)

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[i] https://www.msn.com/en-us/money/companies/the-ai-data-center-boom-is-a-job-creation-bust/ar-AA1zMZ4t[i]

[ii] https://www.pa.gov/content/dam/copapwppagov/

en/revenue/documents/incentivescreditsprograms/computerdatacenterequipprog/

documents/computer_data_center_equip_exemption_program_guidelines.pdf

[iii] https://www.nature.com/articles/s41545-021-00101-w

[iv] https://www.techtarget.com/searchdatacenter/tip/Understanding-the-impact-of-datacenter-

noisepollution#:~:text=Data%20center%20staff,decreased%20productivity%20and%20increas

ed%20stress.

[v] https://drive.google.com/file/d/1hWzexhWtpYPCpJZ6EiFBXLQ7HwkfjgXD/view?usp=drive_link