

Comment by Lloyd Zeiler, Allegheny

Public Comment from Lloyd Zeiler

Re: Docket No. **M-2025-3054271** – Data Centers and Large-Load Energy

Customers To Whom It May Concern:

I am writing to express deep concern regarding the potential expansion of large-load infrastructure, such as data centers, in Pennsylvania—particularly those that may rely on electricity generated from hydraulic fracturing (fracking). While economic development is important, it must not come at the expense of public health, environmental safety, or our constitutional rights.

The fracking industry continues to pose serious threats to Pennsylvania communities. Residents across the Commonwealth have been forced to live near well pads located mere hundreds of feet from their homes, schools, and drinking water sources. These inadequate setbacks violate the intent of Article 1, Section 27 of the Pennsylvania Constitution, which guarantees the right to clean air and pure water.

Equally troubling is the suppression of public voice. Individuals who speak out about the harms of fracking are too often threatened with lawsuits, silenced by industry-backed legal tactics, or bound by non-disclosure agreements. These practices not only stifle victims but also prevent the public from learning critical information about health and safety risks.

Despite long-standing concerns, we still lack basic protections—like regulation of cancer-linked chemicals such as benzene or so-called “trade secret” additives used in fracking fluids. The toxic and radioactive waste produced by drilling in the Marcellus Shale continues to contaminate our waterways and food chain. Studies have already found these pollutants in freshwater clams, and the consequences will only worsen without strong regulatory action.

The 2020 Grand Jury investigation led by then-Attorney General (and now Governor) Josh Shapiro laid out a clear path forward, calling for longer setbacks, public chemical disclosures, and the closure of industry loopholes. To date, many of these common-sense recommendations remain unimplemented.

As the Commission evaluates interconnection and tariff structures for large-load energy customers, I respectfully urge the following:

Mandate transparency on the energy sources used by data centers and other large-load facilities;

Discourage fossil fuel-powered infrastructure, particularly projects that entrench fracked gas in our energy system;

Implement the 2020 Grand Jury's recommendations as a baseline for public health and environmental protection;

Uphold the constitutional rights of Pennsylvanians by prioritizing clean, renewable energy and establishing protective setbacks for vulnerable communities.

Pennsylvania stands at a crossroads. We can either repeat the mistakes of the past by continuing to sacrifice our environment for short-term industrial gain—or we can protect our residents, uphold our Constitution, and lead with integrity.;

Fast-tracking of data center co-location projects will delay Pennsylvania's transition to cleaner energy sources while at the same time approving projects that will generate tons of air pollutants that will worsen the climate crisis and impact the health of nearby communities. This is the wrong direction for Pennsylvania and these burdens must be taken into consideration in the context of any "benefits" offered by this industry.

Rapidly ballooning predictions for data center energy demand are questionable. In 2024, an estimated 16 GW growth in demand by 2030 predicted in January increased to 65 GW by the end of the year.[i] Claims like these are difficult to substantiate and may be intended to provide incentives for investors rather than facts for policymakers.

In a report published in March, the Southwest Energy Efficiency Project recommended that "Utilities should propose and attempt to get approval for tariffs that require new large data center customers, and other new large customers to purchase 100% of their electricity from renewable or net zero carbon generation resources." [iv], Pennsylvania produced 4% of the electricity it consumed from renewable energy in 2024, an increase of just 1.5% from 2015.[v] The state ranks 48th in renewable energy growth.[vi] Many data centers in Pennsylvania will be powered by climate-killing fossil fuels and nuclear energy, not renewables.

A recently demolished coal-fired power plant is now planned to become a data center powered by a new natural gas plant, the largest in the country. The Indiana County campus would be powered by a 4.5 GW natural gas power plant, more than twice the capacity that the former coal plant once generated.[vii] This plan ignores the community and climate impacts of natural gas development.

"We need double the energy we currently have in the United States for AI to really be as big as we want to have it because it'll be very competitive with China," President Trump told the World Economic Forum.[x] PUC must not jump to questionable, baseless conclusions that

fail to take into account technological innovations and a clearer understanding of actual demands for capacity.

A recent Duke University study introduced the concept of “curtailment-enabled headroom” based on “load flexibility.” “By leveraging flexibility, new large loads can be interconnected more quickly while reducing the need for premature investment in additional power plants and transmission lines,” say the researchers.[xiii]

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.[xiv], An industry newsletter noted that “the communities most vocal about opposition to more data centers appear to be ones where people already know what living close to data centers is like,” citing the small number of jobs they create as one reason. “There’s not an easy solution on this front given that most data centers require few employees, and increasing data center automation will shrink workforces even further.”[xv]

Please reread my opening comments.