Comment by Liz Robinson, Philadelphia

Re: Docket No. M-2025-3054271

I thank the PUC for recognizing the need to develop a tariff that is suitable to meet the challenge presented by the proliferation of data centers across our commonwealth. Pennsylvanians are already paying a hefty price every month in higher capacity prices due to PJM's failure to process interconnection applications for new generation in a timely manner. It is critical that the PUC get out in front of the problem, unlike PJM.

The value of data centers, and artificial intelligence (AI) on human society remains to be seen. While certainly there are many areas where AI is and will continue to add value, there are many others where it is and will continue to create problems. Cryptomining has very limited positive potential and extraordinary negative potential. As relatively new, but huge users of electricity, it is prudent for the PUC not to assume that these industries provide positive net value to Pennsylvania, but to consider all the evidence.

Both industries create very few jobs, and in fact AI is most certainly already reducing employment of many types as it replaces many entry level jobs in retail, manufacturing, healthcare, computing and service industries.

Both AI and crypto concentrate wealth even further in a very few hands, thus worsening income inequality and increasing social instability across our country.

The PUC needs to ensure that data centers and cryptomining have no adverse impact on other ratepayers. These types of large loads should be required to "bring their own power" and both should be on interruptible rates. These customers can easily afford on-site storage if they wish to run during periods of load shifting.

These facilities need to be highly energy and water efficient . Noise pollution from both industries is considerable and needs to be taken into account in siting. Setbacks from schools, hospitals, and residential buildings needs to be at least 1000 feet.

Data centers and crytomining operations should be required to utilize clean energy in order to prevent them from worsening air quality and climate insecurity.

According to Carnegie Mellon and its research partners, “Power sector emissions could increase 30% compared to scenarios without data center growth, reaching 275 million metric tonnes of CO2 annually by 2030. That matches the entire annual carbon output of France.”

The reporting requirements are out of step with the state's efforts to fast-track data center approvals. The tentative order states that compliance reports must be filed on an annual basis by the end of the first quarter of the following year. Compliance data should be available on a real-time basis so that pertinent information is accessible as future data centers are fast-tracked.

Thank you for this opportunity to comment on this important matter.