

Comment by Sandy Field, Union

Re: Docket No. M-2025-3054271

I attended the en banc hearing on this topic and was struck by two things about these large load electricity users. First, they want special treatment. They want to be prioritized in the line to receive electricity over residential and other business users and they don't want to pay the true cost of their business. Second, their enormous power use will completely overwhelm our public utility providers. We need to slow this process to enable our utilities to plan for this type of growth of this very speculative industry.

I support the following statement from the Better Path Coalition and No False Climate Solutions PA. "The problems being addressed in PUC's tentative order are largely manufactured ones resulting from the state's rush to get into the data center business before the boom goes bust. As is too often the case, the public is only engaged after the big decisions are made. Our first opportunity to comment comes when the only things left to decide are how to deal with the new project/business/industry. At that point, advancement of the thing under consideration is taken to be an inevitability when it really isn't. Therefore, we feel it is important to state up front that we oppose the approval of hyperscale data centers in Pennsylvania based on many well-documented concerns about their environmental, health, safety, climate, quality of life, economic, and ethical impacts that scattershot regulations across agencies, in this case tariffs, cannot address. Our regulatory agencies should be our advocates, using their expertise to stop the state from creating preventable problems rather than resigning themselves to managing them."

The data center gold rush in Pennsylvania is just another poorly veiled attempt to build more natural gas infrastructure in the state at a time when we should be focused on moving away from fossil fuels and toward renewable energy sources. Data centers will harm our communities economically and environmentally.

Electricity generation is not regulated in Pennsylvania, so the tariff only pertains to distribution costs. If approved, the tariff would not protect the public from generation costs which account for roughly 45% of consumer energy bills. Carnegie Mellon and its research partners projected that electricity generation costs will increase by as much as 25% by 2030. According to the Bipartisan Policy Center, "The exact trajectory of future electricity use by data centers is unknown due to 1) improvements in AI system efficiency; 2) the unpredictability of demand for AI services; and 3) limits in manufacturing production capacity of AI chips, servers, and associated infrastructure." The PUC is operating in the dark as it attempts to establish a tariff.

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.”, Natural gas would be used to power data centers. Methane leaks occurring at every step of natural gas production, transmission, and distribution exacerbate climate change. Hundreds of thousands of legacy wells leaking methane unchecked further add to the state’s contribution to the climate crisis. Continued and even increased natural gas production to power data centers is unacceptable., Carnegie Mellon and its research partners say that already “Virginia's data center growth drives increased fossil fuel use in nearby states like Ohio, Pennsylvania, and West Virginia, potentially undermining state and regional climate goals.”

PUC’s order requires Large Load Customers to contribute to the utility’s hardship fund, but provides no relief for residential customers ; this is unfair, especially given the stunning figure cited by Commissioner Barrow that, according to U.S. Census Bureau data, “nearly a quarter of all Pennsylvanians have been unable to pay an energy bill in full in the last 12 months.” The fact that there is no agreement on contributions to the hardship fund among all of the commissioners is extremely concerning., Throughout the discussion of the tentative order, the PUC’s disposition fell short of imposing the most stringent requirements on large load customers. Therefore, the tentative order is weak and inadequate., 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.

Please use whatever tools you have to require full assessment of these projects including energy and water use, full evaluation of impacts on energy distributors and customers, and full payment for the cost of these speculative projects from the data center companies. Pennsylvanians have a constitutional right to clean air and water and we don’t want to pay the costs of implementing a terrible new industry that will harm our communities economically.