Comment by Susan Babbitt, Philadelphia

Re: Docket No. M-2025-3054271

Preventing problems is easier than solving them.

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."

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.

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."

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.