

Comment by Jennifer Guise, Cumberland

Re: Docket No. M-2025-3054271

I am writing to comment on the model tariff.

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.”

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.

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.”

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., 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., 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 your attention.