

Comment by Elissa Weiss, Allegheny

Re: Docket No. M-2025-3054271

While I appreciate the PUC's efforts to responsibly approach the dawning use of AI and its associated data centers, we cannot simply proceed while enthusiastically overlooking AI's many uncertainties, as well as the the "many well-documented concerns" regarding the hyperscale data centers that are cited below in the general statement.

There are uncertainties about AI's benefits, many of which border on the fantastical and are at best merely speculative. There are uncertainties about its capabilities, with examples of errant outcomes due to assumptions that AI will "learn" to rationally proceed to the next logical conclusion that a human would make in an extraordinary situation when, as it's designed, it can only logicize on the basis of what it has already been trained on or what has already been encountered before such an extraordinary situation occurred. There are uncertainties about potential uses and misuses of its neutral features, such as occur with all technologies, for intended or unintended malign purposes, such as imaging real people doing or saying actions or words that they have not, leading to the creation of a fake reality and ambient confusion in the possibly broad populace who are exposed to the fakes.

NO ONE PERSON OR DEMOCRACY-GENERATED ENTITY IS IN CHARGE OF OVERSEEING OR REGULATING ITS CAPABILITIES OR ITS USES.

And Sam Altman, head of Open AI, a leading company generating and promoting AI, in interviews displays no anxieties, and, in fact, only ambivalence and a laissez attitude about any of the above uncertainties. I have heard no other heads of such companies expressing a need for a responsible, controlled emergence of AI. There seems to be only an unrestrained approach to "let's go!! .. we have to do this now!". To which I respond: "Why? Because AI enthusiasts say so?"

An electric tariff on either the generation, the distribution side, or in any other associated function or consequence **MUST ENSURE** that, in the event of any violations: **FULL** reparations should be made to the citizens both individually and collectively and as much in-kind as possible. — and you can know for certain that many of the damages will be irreversible; and, the fines for these violations must be of such a nature, in quality and in quantity, as to **MEANINGFULLY AND EFFECTIVELY** deter any such future violations.

AI is at this point a shiny but roughly-hewn object of indefinite and possibly immense capabilities and purportedly huge money-making and power-bestowing capacity being dangled in front of the eyes of money-hungry and power-hungry brokers, politicians, and the public, with absolutely no controls and no guaranteed safety certainties. Its rapid and unfettered adoption and promotion occurs at the peril of all of us, our society, and our

world. It is OPTIONAL to dive into this. It is responsible ONLY to wait, proceed cautiously and observe, and ferret out responsible approaches to these many uncertainties, approaches that will prevent many potential catastrophes and lead us on a path to a wiser future.

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.”

That data centers, AI, or the illusory and energy-demanding cryptocurrency and its mining should be facilitated in consuming valuable resources that are in increasingly short supply while damaging the environment on which we depend for our very health and sustenance, and to do so while so many of our citizens struggle to simply achieve fulfilling the most basic of their needs, is short-sighted, irresponsible, and, frankly, criminal.

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.

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.”, 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.

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., 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.

I reiterate:

AI is at this point a shiny but roughly-hewn object of indefinite and possibly immense capabilities and purportedly huge money-making and power-bestowing capacity that is being dangled in front of the eyes of money-hungry and power-hungry brokers, politicians, and the public, with absolutely no controls and no guaranteed safety certainties. Its rapid and unfettered adoption and promotion occurs at the peril of all of us, our society, and our world. It is OPTIONAL to dive into this. It is responsible ONLY to wait, proceed cautiously and observe, and ferret out responsible approaches to these many uncertainties, approaches that will prevent many potential catastrophes and lead us on a path to a wiser future.