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December 21, 2025

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, Second Floor
400 North Street
Harrisburg, PA 17120

RE: Pennsylvania Public Utility Commission Model Tariff for Large Load Customers
Docket No. M-2025-3054271

Dear Chairman DeFrank,
Thank you for the opportunity to provide public comment on Docket No. M-2025-3054271.

I have read comments from Carolyn Comitta and copied in her words as I could not put it better; adding some of my own. Ms. Comitta's comments that I agree with in quotation marks.

"As Pennsylvania continues to experience a proliferation of data centers, I am deeply concerned about their impacts on energy bills, our environment, and the strength and reliability of our energy grid.

"First, working families across Pennsylvania are already dealing with higher costs of living, especially in their utility bills, due to ongoing inflation and other factors. The idea that they could now be forced to effectively subsidize the energy demands of wealthy companies in the data center industry is unfair and unacceptable." We have been given these types of burdens in the past, and, frankly, I am tired of it. These wealthy individuals and companies seem to do everything they can to pass any financial burden to those of us who can least afford it, while our communities gain no benefit for the fees we pay. Worse is the lack of transparency around what we are paying for while officers and CEOs of these companies are paid millions.

This year, electric utility shutoffs in Pennsylvania have increased by more than 20 percent. How much more can we burden our communities?

"The NRDC estimates that data center-driven load growth in the PJM region could increase capacity costs to more than $163 billion by 2033, raising average household electric bills by $70 per month. However, they could be even higher. The reality is, we simply do not know how much electricity data centers will use in the future due to limited information and the rapid evolution of artificial intelligence. Given ongoing confusion and chaos at the federal level and attempts to cut vital programs like SNAP and LIHEAP, added economic uncertainty is only further burdening working families and households that rely on stability to make ends meet."
I strongly believe that forcing these data centers to be self-sufficient through green energy sources is the best solution for all of us. I realize this is a struggle at the current level, but frankly, I have a right to peace in my home. We own a small farm in Bradford County PA, and the tranquility and beauty has been severely marred by the fracking industry. Between the pumping stations/wells, trucks and severe use of the water in the Susquehanna River, the environment has been severely and negatively impacted. These increases in demand on the grid will result in more fracking and mores severe impacts.

"In addition, I have serious concerns regarding the impact of data centers on the strength and reliability of our grid. With decarbonization and electrification across multiple sectors, including transportation, buildings, and commercial industry, the demand for electricity has been steadily rising in recent years. After two decades in which U.S. electricity consumption increased by less than one percent annually, it is projected to surge over the next five years. Couple that with extreme weather

events like heatwaves and severe cold, power outages" (our home consistently experiences them in all types of weather) "and disruptions are a growing concern. Following conversations with PJM, it is crucial that we prioritize grid reliability over rapid data center growth."

"To protect consumers and ratepayers, the model tariff must:

• Ensure that large load customers and data centers – not households and families – are responsible for all the costs of the necessary infrastructure built to serve them and manage the impacts they create.

• Prevent utilities from shifting expenditures across the general rate base, so residential and small business ratepayers are not forced to absorb additional costs created by data centers.

• Emphasize that data centers are liable for ongoing costs if a facility closes, falls short in its commitments, or demand fails to materialize.

• Require that large load customers and data centers contribute to utility assistance programs or hardship funds."

In addition, **they must clean up their mess**.

"Next, in the absence of clear renewable energy standards and environmental safeguards, the rise of data centers in Pennsylvania risks accelerating fossil fuel development and negatively impacting our air and water. The Commonwealth already accounts for 1 percent of global emissions and has the third-dirtiest power sector in the nation. With the recent decision to withdraw from the Regional Greenhouse Gas Initiative, a lack of legislative action on related bills, and renewable energy standards that plateaued years ago, Pennsylvania continues to lack an actionable strategy to address climate change and the urgent need to transition from emissions. Many data centers would be powered by natural gas, further tying us to fracking and its well-documented negative impacts on our land, air, water, and the health of nearby families. With more fracking wells, we can expect a rise in harmful emissions and related illnesses, especially among children, the elderly, and people with respiratory conditions, like asthma."

In addition to the water used in (and contaminated by) fracking, data centers require large amounts of water to cool their equipment. According to the Environmental and Energy Study Institute, large data centers can each consume up to 5 million gallons per day, or about 1.8 billion annually, usage equivalent to a town of 10,000 to 50,000 people. Keep in mind, as data centers use more energy, power generators emit more emissions, and, in turn, they require more water to stay cool. Again, the exact amount of water consumed by individual data centers is difficult to determine because there is very little data publicly available. However, there is no doubt that more data centers mean more water use, as they pull from reservoirs, basins, and our drinking water supply, potentially impacting our access to a reliable water supply, especially during droughts."

Given what we do know about our limited water resources and the pollution humans have instilled in water all over the world, any impact to our water is unacceptable. ***Humans can live without money, power and many other things, but we cannot live without clean, consumable water!***

"Furthermore, I want to underscore the importance of protecting local authority and input on zoning, siting, land use, and permitting for data centers. **Communities must retain the ability to decide whether, where, and how data centers are developed. Alongside air quality and water impacts,**

data centers raise other quality-of-life concerns for our communities, such as noise and light pollution.

To protect our environment, public health, and our communities, the model tariff must:

• Require large load customers and data centers to implement energy efficiency measures and source clean, renewable energy and/or battery storage.

• Require the use of recycled or non-potable water to meet cooling needs and conserve limited potable water resources.

• Provide transparent reporting on energy procurement and usage, water usage, and environmental impacts.

• Require consideration of all factors impacting communities, including affordability, grid reliability, public health, quality of life, and environmental impacts.

• Ensure opportunities for public input and participation in the final adoption of this model tariff.

As a major energy-producing state, Pennsylvania is well positioned to be a leader in the data center industry. However, we must approach this opportunity cautiously, carefully, and with a full understanding and accounting of the potential impacts on our communities. Remember, we are still dealing with the legacy of coal (abandoned mines and coal waste) and are the impacts of fracking (abandoned wells and contaminated waterways). Like them, data centers are expanding quickly and touting tremendous economic benefits. Yet, data centers create relatively few permanent jobs, especially compared to the industries artificial intelligence is disrupting. Without meaningful safeguards beginning with a strong model tariff, we risk entrenching pollution, exacerbating climate risk, and imposing long-term costs on public health and the environment."

Given the information noted above, I personally prefer to NOT have any data centers in our state.

However, if that cannot be stopped, then "we must be vigilant in managing the data center "gold rush," or it could easily become another industry that's been allowed to run roughshod over our Pennsylvania communities."

Thank you for considering my comments.

Sincerely,

Karen Macauley
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Owning property in Chester, Delaware, Bradford Monroe counties in Pennsylvania