

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Accelerated Transmission and
Energy Redevelopment Study

Docket No.
M-2026-3059601

**COMMENTS OF PERSISTENCE ANALYTICS GROUP LLC
REGARDING EVIDENTIARY MATURITY, DEPENDENCY VALIDATION,
AND REVALIDATION IN PATER PHASE 2**

Persistence Analytics Group LLC ("PAG") respectfully submits these comments in response to the Commission's invitation for written comments regarding the PATER Part A Preliminary Assessment of Potential Opportunities Report. PAG is an independent advisory and analytics firm focused on whether consequential infrastructure assumptions are sufficiently evidenced before public or private reliance hardens, and whether continued reliance remains justified after material change.

PAG does not seek to second-guess the engineering, transmission, generation, environmental, economic-development, or site-selection work being performed by the Commission, KeyLogic LLC, EPRI, utilities, or other technical participants. The narrower issue addressed here is the evidentiary state of a redevelopment opportunity when a screening result begins to influence infrastructure commitment, capital allocation, incentives, utility planning, or representations to prospective large-load customers.

**A site can be sufficiently evidenced to justify further study without being
sufficiently evidenced to justify infrastructure commitment, capital
allocation, incentive reliance, or representation to a prospective large-load
customer.**

**I. SCREENING STATUS SHOULD REMAIN DISTINCT FROM DECISION-GRADE
READINESS**

A preliminary assessment necessarily uses screening criteria, assumptions, proxies, and available information to identify candidate opportunities. That is appropriate for Phase 1. The

risk arises only if a screening classification is later treated as evidence of a more mature project state without identifying what additional facts have actually been established.

For Phase 2, PAG recommends that PATER preserve an explicit distinction among the following states:

**Candidate Site -> Represented Existing Capability -> Site-Specific Evidence
-> Dependency Validation -> Executable Redevelopment State -> Decision-
Reliance State -> Material Change -> Revalidation**

The purpose of this distinction is not to create a new approval layer. It is to make clear what proposition has been evidenced at each stage. A candidate site may warrant further technical diligence while still depending on unresolved transmission upgrades, generation availability, environmental review, property control, equipment, permitting, financing, customer commitment, schedule, or other conditions.

II. DECISION-CRITICAL ASSUMPTIONS SHOULD PRESERVE SOURCE, DATE, PROVENANCE, AND EFFECTIVE STATE

Where a PATER conclusion may later influence a consequential decision, the underlying record should preserve enough information to determine what was known, when it was known, and what proposition the evidence actually supported. PAG therefore recommends that material assumptions and representations carry, where practicable, source provenance, an effective date or observation date, and the date of the last material validation or update.

This is particularly important for information that can change faster than the surrounding study process. Examples may include available electric capacity, transmission dependencies, interconnection status, generation assumptions, site control, permitting posture, customer identity or commitment, expected load, redevelopment schedule, equipment availability, and material infrastructure dependencies.

A current record should not be inferred merely because a value remains present in a database or report. Evidentiary currency is separate from data availability. A representation can remain visible after the factual basis supporting it has materially changed.

III. UNRESOLVED DEPENDENCIES SHOULD REMAIN VISIBLE

A redevelopment opportunity can appear highly attractive while remaining dependent on one or more conditions that have not yet matured. PAG recommends that Phase 2 make material unresolved dependencies visible rather than allowing them to disappear inside an aggregate readiness label.

This can be done without creating a public scoring methodology. For a consequential representation, the record can identify the proposition supported, the principal evidence supporting it, and the material dependencies that remain unresolved. The decision-maker can then determine whether that evidence is sufficient for the consequence of the decision being considered.

The evidentiary maturity of a represented site or capability should match the consequence of the decision for which the Commission, a utility, a public body, an investor, or a prospective customer relies upon it.

IV. MATERIAL CHANGE SHOULD TRIGGER REVALIDATION OF THE AFFECTED DETERMINATION

Initial validation should not be treated as permanent validation. A conclusion can be well-supported when made and later become stale because a material fact, dependency, or assumption changes. Phase 2 should therefore identify categories of change that require the affected determination to be revisited before continued reliance.

Potential revalidation events may include material changes in represented load or generation, project scale, site control, customer or counterparty identity, financing, schedule, interconnection status, transmission or generation dependency, permitting posture, infrastructure availability, or another condition that formed part of the basis for the earlier conclusion.

Revalidation need not mean restarting the entire study. It should be proportionate to the change. The objective is to reopen the determination that depended on the changed fact and establish whether the evidence remains sufficient for the decision that continues to rely upon it.

V. REQUESTED PHASE 2 TREATMENT

PAG respectfully recommends that the Commission consider directing Phase 2 work to:

1. Distinguish screening status from decision-grade readiness, so a Phase 1 opportunity classification is not silently converted into evidence of executable redevelopment or infrastructure readiness.
2. Preserve source, date, provenance, and, where material, the last validated or effective state of decision-critical assumptions and representations.
3. Identify material unresolved dependencies and make clear what proposition each consequential item of evidence actually supports.
4. Match evidentiary maturity to decision consequence, recognizing that evidence sufficient for further study may be insufficient for infrastructure commitment, capital allocation, incentive reliance, or customer-facing representation.
5. Treat material change as a revalidation event for the affected determination rather than merely as a database or report update.

PAG is not proposing a new public scoring system, a separate approval regime, or displacement of the Commission's or its technical contractors' judgment. The recommendation is narrower: preserve the distinction between what is represented, what has actually been evidenced, what dependencies remain, and whether the evidence remains current when a consequential decision is made.

CONCLUSION

PATER can create substantial value by identifying redevelopment opportunities and accelerating the examination of sites that may support future energy and large-load needs. Phase 2 can strengthen that value by ensuring that screening results do not harden into decision-grade representations faster than the evidence supporting them.

For the reasons above, PAG respectfully recommends that the Commission incorporate evidentiary maturity, dependency visibility, evidence currency, and material-change revalidation into the Phase 2 treatment of candidate redevelopment opportunities.

Respectfully submitted,

Neil P. Osnato

Founder

Persistence Analytics Group LLC

Decision Assurance(TM) | Infrastructure Assumption Verification(TM)

neil@persistenceanalyticsgroup.com

October 8, 2026