

Docket # M-2026-3059601

PATER Study Part A

October 7, 2026

Commissioners
Pennsylvania Public Utility Commission

Dear Commissioners,

Thank you for your service to the Commonwealth and the citizens of Pennsylvania. My name is James Rebarchak and I am a retired state employee, working for 35 years at the Department of Environmental Protection in the Southeast Regional Office. My whole career was spent in the Air Quality Program, working my way from a field inspector up to the Program Manager for my final 15 years with the Agency. To that end I am familiar with the public comment process and I hope that you will find my comments on Part A of the PATER study useful to your decision as the statewide transmission and energy redevelopment process moves on to the second phase.

My comments will focus primarily on the Cromby Generating Station, but when addressing environmental considerations, can also apply to Barbadoes and Jefferson Smurfit Corp JSC.

Comment 1: The Southeast Region is designated Serious Non-attainment for Ozone and is in jeopardy of being downgraded to Severe Non-attainment.

I applaud the Commission for considering environmental conditions at the site, but Part A of the study should have considered Air Quality. Cromby, Barbadoes and Jefferson Smurfit are in a part of the state where Air Quality Regulations are more stringent due to our non-attainment status. A Major facility in the Southeast Region is defined as a facility which emits or has the potential to emit 25 tons per year or more of nitrogen oxides or volatile organic compounds. New Source Review requirements would probably apply to any new power plant, which in turn would require Emission Reduction Credits (ERC). These credits are supposed to be purchased from within the same air basin as the project with an offset of 1.3:1. In reviewing the most current ERC registry, there are sufficient credits in the the region, but most of them are set to expire in 2029 or 2030. Understanding the process for siting, permitting and building a new power plant, it is unlikely that any plant considered for the SE Region

would be able to secure the necessary ERCs prior to 2030. I am also unaware of any other major facility that would be closing within the region that would be able to retire enough credits to support a new power plant in the region.

Comment 2: Proximity to Limerick Nuclear Power Plant

Limerick Nuclear Power plant is located only 6 miles away from Cromby, which places it within the 10-mile Emergency Planning Zone. If a utility were to be placed at Cromby, the operations, workforce, and emergency shutdown procedures would need to be integrated into the emergency response procedures should an incident occur at Limerick.

There is also the shared grid infrastructure, which I believe is reviewed in this study. If Limerick runs continuously at 100% baseload, the transmission lines may only be able to handle a peaking plant or a battery storage facility. It is highly unlikely that the current transmission corridors in the region could be expanded, considering the current population density.

Lastly, I recall when 9/11 occurred and the response to it had the military deployed with anti-aircraft systems at Limerick. Would it be wise to have two utilities in such close proximity when smart missiles are targeting these types of systems to disrupt a nation's infrastructure. If my research is correct, the NRC would be considering this hazard.

Comment 3: The infrastructure and community surrounding Cromby may not be able to support a new utility.

The PATER Part A study considered the proximity to local highways and local population. Cromby was built in the 1950s along the Schuylkill river in East Pikeland Township, just outside Phoenixville Borough. At that time Phoenix Iron and Steel was still operational and was supporting the local economy. Much of the surrounding property around Cromby was agricultural. Once the steel mill closed in 1984, the area became depressed. It wasn't until the 2000s that downtown Phoenixville started to revitalize, which then spread to the adjacent municipality of East Pikeland. Since Cromby ceased operation in 2011, the surrounding community is no longer industrial, but has become more of a bedroom community, with Phoenixville being a location for shopping, dining and entertainment. Also since they ceased operation, approximately six (6) communities were built providing 935 residential units (single family, townhome, and rental apartments) within 3 miles of the site. Additionally, the Renaissance Academy Charter School is located at Cromby Road and Fillmore Street and serves approximately 1200 students. Also surrounding the site is the Hidden River Open Space Parcel, the Schuylkill River Trail, and Reservoir Park.

With the increasing population as well as the Charter School in the community, navigating the roads surrounding the site is becoming difficult without some serious infrastructure improvements to the roads.

While I cannot speak to how the folks in the community will view the reopening of a power plant in an area that is a Brownfield and is a utility zone, my experience with PADEP leads me to believe there could be strong opposition similar to what we saw with the opposition to Homer City. As Secretary Shirley indicated, reusing Brownfield sites is a win-win-win for communities, but more consideration into the right type of facility that will complement our growing community is more important than the metrics considered in this initial report. Thank you for your time.

Sincerely yours,

James Rebarchak