

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. M-2026-3059601

Re: Pennsylvania Accelerated Transmission and Energy Redevelopment (PATER) Study
— Part A

PUBLIC COMMENTS OPPOSING THE INCLUSION OF BARBADOES ISLAND AS A CANDIDATE FOR ENERGY REDEVELOPMENT

Submitted by: David Conway

Location: Bridgeport, Montgomery County, Pennsylvania

Date: October 13, 2026

I. Introduction and Request for Removal

I am submitting these comments to formally object to the continued consideration of Barbadoes Island, located in the Schuylkill River in Montgomery County, Pennsylvania, as a candidate for energy redevelopment under the Pennsylvania Accelerated Transmission and Energy Redevelopment (PATER) Study.

I respectfully but firmly request that the Pennsylvania Public Utility Commission remove Barbadoes Island from the list of candidate redevelopment sites and exclude it from further prioritization under Part B of the study.

My objection is based on several significant deficiencies identified within the PATER Part A report itself.

These include:

1. Apparent duplication of infrastructure data from an entirely different generating facility.
2. Material inconsistencies between the report's narrative and numerical findings.
3. The site's FEMA-designated floodway status and the absence of a demonstrated, site-specific analysis of the resulting development constraints.
4. Confirmed groundwater contamination and unresolved environmental remediation questions.
5. Substantial limitations on available acreage relative to the scale of redevelopment options being evaluated.
6. Reliance on theoretical generating-capacity estimates that do not establish actual construction feasibility.

7. Failure to demonstrate that Barbadoes Island offers meaningful redevelopment advantages over other candidate sites.

Individually, these issues warrant scrutiny. Collectively, they raise serious questions about the basis for Barbadoes Island's inclusion in a study intended to identify Pennsylvania's most promising energy redevelopment opportunities.

The Commonwealth should not commit additional planning resources to advancing a site merely because it formerly generated electricity and retains some associated infrastructure.

The purpose of this study is to identify locations where redevelopment is technically feasible, economically justified, environmentally responsible, and consistent with long-term infrastructure planning.

Based on the information currently presented, the report fails to establish that Barbadoes Island meets that standard.

II. Apparent Duplication of Infrastructure Data Raises Serious Questions About the Reliability of the Assessment

The most immediate and objectively verifiable concern is a significant apparent data duplication between two unrelated properties.

On page 36, Section 4.2, the report evaluates Armstrong Power Station in Armstrong County, Pennsylvania.

On page 37, Section 4.3, the report evaluates Barbadoes Island in Montgomery County.

Despite the substantial geographic separation between these facilities, **every infrastructure-distance measurement in Table 8 for Barbadoes Island is identical to the corresponding measurement in Table 7 for Armstrong Power Station.**

The following comparison illustrates the problem.

Table 1. Identical Infrastructure Measurements for Two Different Sites

Infrastructure attribute	Armstrong Power Station — Table 7, p. 36	Barbadoes Island — Table 8, p. 37
Distance to major road	4.39 miles	4.39 miles
Distance to rail network	0.07 miles	0.07 miles

Distance to major river	0.33 miles	0.33 miles
Distance to transmission line	0.00 miles	0.00 miles
Distance to substation	0.07 miles	0.07 miles
Distance to natural gas pipeline	3.01 miles	3.01 miles
Distance to broadband infrastructure	4.51 miles	4.51 miles
Distance to Marcellus Shale formation	0.00 miles	0.00 miles
Distance to wastewater treatment facility	6.11 miles	6.11 miles
Distance to nearest brownfield site	14.81 miles	14.81 miles

Sources: PATER Part A, page 36, Table 7, *Armstrong Power Station details*, and page 37, Table 8, *Barbadoes details*.

This is not a minor discrepancy involving one questionable measurement.

It is an exact duplication of ten separate geographic measurements, reported to two decimal places, for facilities located in different regions of Pennsylvania.

The values also align with Armstrong Power Station's narrative rather than Barbadoes Island's narrative.

For example, the Armstrong description states that the property is situated on the Marcellus Shale formation, with a natural gas pipeline approximately three miles away, broadband approximately 4.5 miles away, and the nearest brownfield approximately 15 miles away.

Those statements correspond to Table 7.

In contrast, the Barbadoes Island narrative reports substantially different conditions:

- The Marcellus Shale formation is approximately 50 miles away, yet Table 8 reports **0.00 miles**.
- The nearest wastewater treatment facility is approximately one mile away, yet Table 8 reports **6.11 miles**.
- The nearest brownfield is described as adjacent to the island, yet Table 8 reports **14.81 miles**.

- The island is described as having immediate access to natural gas and broadband infrastructure, yet Table 8 reports distances of **3.01 miles** and **4.51 miles**, respectively.

The natural gas and broadband differences could conceivably reflect distinctions between on-site connections and mapped regional infrastructure. That possibility does not explain why all ten reported distances are identical to Armstrong's values.

The evidence strongly suggests that infrastructure measurements associated with Armstrong Power Station may have been duplicated or incorrectly attributed to Barbadoes Island.

I am not suggesting that this duplication was intentional. However, the apparent error is substantial and should not be dismissed as a harmless formatting problem.

Infrastructure proximity is a central component of the PATER evaluation methodology. Incorrect measurements could materially affect the determination of a site's readiness, costs, development schedule, and suitability for particular technologies.

The Commission should require KeyLogic to explain how ten identical measurements appeared in two geographically distinct site assessments and whether incorrect Barbadoes Island measurements were used in subsequent modeling, redevelopment analysis, or preliminary site evaluations.

The Commission should also require verification of the source GIS data, rather than simply accepting revised figures without explanation.

The apparent duplication raises a broader question: if the published site-level infrastructure table was not independently verified, what assurance exists that the other attributes used to evaluate Barbadoes Island were correctly assigned?

Until that question is answered, the Barbadoes Island assessment cannot reasonably be treated as a sufficiently reliable basis for continued prioritization.

III. Barbadoes Island's Floodway Designation Is a Fundamental Development Constraint

The report acknowledges that Barbadoes Island is situated within the Schuylkill River and identifies its FEMA flood hazard classification as **Floodway**.

At the same time, Table 8 identifies its overall FEMA Natural Hazards Risk as **Very low**.

These classifications measure different things and are not necessarily inconsistent. However, the presentation risks understating the significance of the property's floodway designation.

Source: PATER Part A, page 37, Section 4.3 and Table 8.

A general natural-hazards risk classification should not be used to minimize the practical implications of constructing major energy infrastructure within a designated floodway.

The relevant question is not simply whether the surrounding area receives a low regional risk score.

The question is whether this particular island can safely and lawfully accommodate the substantial construction contemplated under the PATER initiative.

Potential redevelopment options include natural gas generation, battery energy storage, nuclear generation, and energy-intensive industrial facilities.

Depending on their design, such installations could require extensive site preparation, structural foundations, electrical equipment, access improvements, grading, stormwater infrastructure, and flood-related engineering.

Yet the Barbadoes Island assessment does not establish:

- The precise portions of the property within the regulatory floodway.
- The amount of land remaining suitable for new construction after applicable restrictions.
- Whether major changes in grading or installation of new structures would be permissible.
- Whether construction would affect flood elevations or conveyance.
- What flood-related engineering or mitigation would be required.
- The costs and permitting timelines associated with addressing those conditions.

Without that information, statements concerning the island's readiness for redevelopment are premature.

The site description characterizes the property as generally cleared and available for development. That characterization is particularly troubling when it appears alongside an acknowledged floodway designation without a corresponding explanation of development constraints.

Land that is cleared of buildings is not necessarily land that can be legally, safely, or economically redeveloped.

Floodway conditions should be a primary consideration in evaluating Barbadoes Island, not an issue deferred until after the site has advanced through another round of prioritization.

I request that the Commission give substantially greater weight to these concerns and exclude Barbadoes Island from further consideration unless a site-specific floodway feasibility assessment demonstrates otherwise.

IV. Confirmed Groundwater Contamination Undermines Claims of Redevelopment Readiness

The report identifies several environmental conditions that further undermine the site's apparent readiness.

Section 4.3 and Table 8 report:

Environmental characteristic	PATER finding
Groundwater contamination	Confirmed
On-site contamination	To be determined
Remediation status	Unknown
Brownfield designation	Not presumptive
FEMA flood hazard	Floodway
Overall FEMA natural-hazards risk	Very low

Source: PATER Part A, page 37, Section 4.3 and Table 8.

These findings should give the Commission considerable concern.

The study confirms groundwater contamination but provides no substantive site-specific explanation in Section 4.3 of the nature or extent of that contamination, its remediation requirements, or its implications for new construction.

The report also does not establish whether contamination remains present in areas that would be disturbed during redevelopment.

The classification of Barbadoes Island as *not presumptive brownfield* requires particular clarification.

In Section 2.3, the authors explain that their presumptive brownfield screening relies primarily on historical generating fuel type. Natural gas and oil-fired facilities are generally presumed to present lower contamination risks than former coal facilities.

However, **a fuel-type-based screening assumption is not a substitute for evaluating documented contamination at a specific property.**

The authors acknowledge that their environmental classifications are preliminary and require site-specific investigation.

Barbadoes Island illustrates precisely why such screening methods can be insufficient.

Regardless of its historical fuel source, the report itself identifies confirmed groundwater contamination.

It is therefore inappropriate to rely on a favorable preliminary brownfield classification as evidence of environmental readiness.

The Commission should require documentation of the contamination finding and a credible understanding of remediation requirements before assigning the island any favorable redevelopment status.

This concern becomes more substantial when considered alongside the property's floodway designation.

The combination of potentially contaminated land and a floodway location warrants careful environmental and engineering investigation before major redevelopment is contemplated.

The report does not provide that investigation, and its findings do not justify advancing Barbadoes Island as a priority redevelopment candidate.

V. The Site's Limited Acreage Is Inconsistent With Many of the Redevelopment Opportunities Being Considered

The report identifies approximately:

- **65.35 acres** comprising the primary parcel.
- **18.88 acres** of potentially available adjacent land.
- **84.23 acres** of combined potential acreage, assuming the additional land can be used.

These figures are reported in Section 4.3 and Table 8, page 37.

Even the combined 84.23-acre figure represents gross potential acreage, not verified developable land.

The report acknowledges that two apparent substations remain on the property.

Any additional land-use restrictions associated with retained infrastructure, access, contamination, or floodway conditions could further reduce the acreage realistically available for new development.

The limited size of this site should be evaluated against the much larger redevelopment opportunities elsewhere in the PATER portfolio.

Section 8.1 reports that nine of the 21 candidate sites have more than 100 acres of potentially available extended acreage.

The former Stanton generating station, for example, is identified as having more than 500 acres of potentially available land.

The study's own analysis of large-load redevelopment also demonstrates that Barbadoes Island does not possess the acreage characteristics of many larger development opportunities.

On page 80, the authors identify a limited group of sites with sufficient acreage for AI-optimized or large co-located data center development.

Barbadoes Island is not among those listed.

The report similarly identifies only AES Beaver Valley and Armstrong Power Station as having sufficient extended acreage to accommodate a hyperscale data center under its screening assumptions.

Source: PATER Part A, page 80, Section 6.1.

Table 32 reinforces these limitations, presenting the following typical site-acreage requirements:

Development type	Site acreage reported in PATER
Colocation data center	37–2,000 acres
Hyperscale data center	247–2,250 acres
AI-optimized data center	144 acres
Barbadoes Island, including potential adjacent land	84.23 acres

Source: PATER Part A, page 86, Table 32; Barbadoes acreage from page 37, Table 8.

These figures do not establish that every form of data center development is impossible on the island. Smaller facilities may require substantially less land.

They do establish that Barbadoes Island falls below the acreage requirements presented for several of the large-scale development types considered in the report.

The Commission should not conflate the theoretical ability to place some infrastructure on the island with meaningful suitability for the larger energy redevelopment opportunities that motivate this study.

Barbadoes Island offers a relatively small gross land area, uncertain developable acreage, existing electrical infrastructure occupying portions of the property, documented contamination, and floodway exposure.

The study provides no compelling site-specific justification for prioritizing such a constrained location over alternatives offering greater land availability and potentially fewer development obstacles.

VI. Theoretical Generating Capacity Is Being Presented Without Demonstrated Site Feasibility

The preliminary redevelopment capacity estimates for Barbadoes Island warrant particular scrutiny.

Table 28, page 78, presents the following figures:

Technology	Capacity estimated from primary parcel	Capacity estimated with additional acreage
Natural gas generation	327 MW	421 MW
Conventional nuclear generation	109 MW	140 MW
Battery energy storage	934 MW	1,203 MW
Solar generation	9 MW	12 MW

Source: PATER Part A, page 78, Table 28.

These estimates are striking when placed alongside the actual information provided about Barbadoes Island.

The report itself explains that these capacities are derived from simplified acreage assumptions.

Table 27 uses generalized land-intensity factors including:

- Natural gas generation: 0.2 acres per MW.
- Conventional nuclear generation: 0.6 acres per MW.
- Battery energy storage: 0.07 acres per MW.
- Solar photovoltaic generation: 7 acres per MW.

These factors are applied to approximate parcel acreage rather than a verified, site-specific development plan.

Source: PATER Part A, page 78, Tables 27 and 28.

The report acknowledges this limitation.

Nevertheless, the resulting figures could create a misleading impression of redevelopment potential if presented without sufficient qualification.

For example, the estimate of **1,203 MW of battery storage capacity** does not demonstrate that such a facility could actually be constructed on the property.

The figure does not establish the required storage duration, total stored energy, flood-related engineering, construction feasibility, environmental remediation requirements, or available site-specific electrical interconnection capability.

Similarly, presenting 140 MW of potential conventional nuclear generation does not establish that the site meets the environmental, safety, regulatory, and physical requirements for such a facility.

These are theoretical acreage-based calculations, not completed feasibility studies.

The distinction is especially consequential at a constrained island property with known environmental concerns.

The Commission should not permit theoretical capacity estimates to substitute for evidence that a proposed redevelopment is feasible.

If these estimates are used in evaluating or ranking Barbadoes Island, they should first be reduced or revised to reflect verified developable acreage and demonstrated site constraints.

Until that work is completed, the figures provide no adequate basis for advancing the island as a redevelopment priority.

VII. The Island's Former Generating Capacity Does Not Establish a Continuing Redevelopment Advantage

The Barbadoes generating station reportedly retired in **1990**, with a historical generating capacity of **248.1 MW**.

That retirement occurred decades before the present study.

The age of the retirement is important because the authors themselves recognize that long-idled facilities present additional uncertainty.

In Section 2.3, the report explains that sites retired more than 25 years ago generally received lower priority unless other factors suggested redevelopment readiness.

The authors note that infrastructure at facilities inactive for extended periods may have deteriorated, been removed, or require substantial replacement.

While Barbadoes Island appears to retain substations, the report does not demonstrate the extent to which historical generating infrastructure remains reusable for new development.

The presence of electrical infrastructure on the property should not automatically be equated with an available 248.1 MW interconnection opportunity.

Nor does the retired plant's historical capacity establish that a new generating facility could be constructed and interconnected under current system conditions without substantial modifications.

The report also explains that historical Capacity Interconnection Rights were not incorporated as a factor in the Part A evaluation and that their potential applicability to retired facilities remains subject to further examination.

Source: PATER Part A, page 24, Section 2.3.

This is a significant limitation.

The underlying rationale for considering retired generating stations is the possibility that their existing infrastructure can reduce the time and expense associated with new energy development.

That proposition must be demonstrated at the site level.

It cannot be presumed merely because a generating station once existed.

The Commission should require evidence of the condition, availability, ownership, and reuse potential of existing electrical infrastructure before assuming that Barbadoes Island offers a meaningful advantage.

VIII. Proximity to Existing Transmission Infrastructure Does Not Justify Selecting This Site

One of the apparent advantages of Barbadoes Island is its proximity to existing electrical infrastructure.

However, that characteristic is not unique.

The PATER report states that **20 of the 21 candidate sites** are located adjacent to or within approximately one mile of existing transmission lines and substations.

Source: PATER Part A, page 99, Section 8.1.

Consequently, proximity to transmission facilities cannot, by itself, justify prioritizing Barbadoes Island.

Other candidate locations also possess existing electrical infrastructure, and several offer substantially greater potential acreage.

Moreover, Chapter 5 explains that transmission hosting capacity must be evaluated at the system level.

The available capacity at any individual location can change based on generation availability, demand, grid conditions, and the development of other sites.

The authors expressly acknowledge that their system-wide hosting-capacity results should not be interpreted as the maximum capability of any individual location.

They further state that environmental conditions, permitting requirements, acreage, and redevelopment costs are not incorporated into the transmission hosting-capacity assessment itself.

Source: PATER Part A, page 62, Section 5.3.

The report's broader findings therefore do not establish that Barbadoes Island offers superior electrical or economic redevelopment potential.

The statewide transmission network may possess available capacity, but that does not answer whether a particular floodway-constrained island is an appropriate location for substantial new industrial infrastructure.

Electrical accessibility is one consideration. It is not a justification for overlooking significant limitations associated with geography, environmental conditions, and developable land.

IX. The PATER Study Should Prioritize Sites With Demonstrable Advantages, Not Unresolved Liabilities

The stated purpose of the PATER initiative is to identify high-value opportunities for redeveloping retired energy infrastructure.

The process is designed to narrow 21 candidate sites to approximately five to seven priority locations during Part B.

The report identifies redevelopment readiness, infrastructure availability, environmental risks, permitting constraints, costs, and economic development potential as important criteria.

Source: PATER Part A, pages 14–16, Table 1 and related discussion.

Barbadoes Island presents unresolved questions in several of those categories.

The available record does not establish:

1. The accuracy of the site's published infrastructure-distance measurements.
2. The extent of legally and physically developable land.
3. The implications of its FEMA floodway designation for major new construction.
4. The nature, extent, and remediation requirements associated with confirmed groundwater contamination.
5. The condition and reuse potential of its remaining electrical infrastructure.
6. The actual generation or load capacity that could be accommodated after accounting for site-specific constraints.
7. The cost of preparing the property for substantial redevelopment.
8. A compelling comparative advantage over other candidate sites.

These are not minor details to be resolved after a development concept is selected.

They are foundational questions that should inform whether the site is included in the candidate portfolio at all.

Part B should focus scarce analytical resources on locations with credible prospects for practical, timely, and economically beneficial redevelopment.

The continued inclusion of Barbadoes Island risks allocating attention and resources to a site whose development limitations have not been adequately established or incorporated into the analysis.

The Commonwealth has already identified numerous other retired generating facilities for consideration.

There is no demonstrated need to advance Barbadoes Island merely to preserve the possibility of redevelopment.

An effective screening process must be capable of eliminating sites whose documented constraints and unresolved uncertainties make them poor candidates for further prioritization.

X. Requested Action

For the reasons described above, I respectfully request that the Pennsylvania Public Utility Commission take the following actions.

First, remove Barbadoes Island from the active list of PATER redevelopment candidates and exclude it from selection as one of the five to seven priority sites under Part B.

The existing report does not demonstrate sufficient site suitability to justify further advancement.

Second, require KeyLogic to investigate and formally explain the apparent duplication of all ten infrastructure-distance measurements between Armstrong Power Station and Barbadoes Island.

This explanation should identify the correct source data and disclose whether inaccurate values were incorporated into subsequent analyses.

Third, require correction of all erroneous Barbadoes Island infrastructure data in the Part A report and any accompanying datasets.

The corrected information should be publicly available.

Fourth, ensure that theoretical acreage-based capacity estimates are not treated as demonstrated redevelopment feasibility.

Any future consideration of the island should be supported by verified developable acreage, environmental due diligence, floodway analysis, infrastructure assessments, and realistic cost estimates.

Fifth, evaluate whether similar data duplication or attribution errors appear elsewhere among the 21 candidate sites.

The exact repetition of ten separate infrastructure values raises concerns about quality-control procedures that extend beyond a single table.

The Commission should require appropriate verification before these datasets are relied upon for major planning decisions.

Finally, require that any future proposal to restore Barbadoes Island to consideration be supported by independently verifiable evidence demonstrating its suitability relative to alternative locations.

Such evidence should address the full range of environmental, infrastructure, regulatory, and economic constraints identified in this submission.

XI. Conclusion

The PATER study represents a substantial public effort to identify promising opportunities for energy redevelopment throughout Pennsylvania.

That objective deserves a rigorous, accurate, and credible evaluation process.

Barbadoes Island's inclusion in the current candidate portfolio raises significant concerns.

The report documents a site situated within the Schuylkill River, designated as a FEMA floodway, with confirmed groundwater contamination, unknown remediation status, and limited gross acreage.

It also presents theoretical redevelopment capacities without demonstrating that those capacities can be realized under the site's actual physical and regulatory conditions.

Most troubling, the published infrastructure-distance measurements appear to have been reproduced in their entirety from the assessment of a different power station located in another part of Pennsylvania.

This apparent data-quality failure substantially weakens confidence in the accuracy of the Barbadoes Island assessment.

The existence of a former generating station and nearby transmission infrastructure is not sufficient reason to pursue substantial redevelopment at a location with significant unresolved constraints.

The report identifies other candidate properties, many with substantially greater acreage and existing grid infrastructure.

The Commonwealth should concentrate its efforts on sites where redevelopment feasibility can be credibly demonstrated.

The Commission should not advance Barbadoes Island to Part B on the basis of incomplete environmental analysis, unverified site conditions, theoretical development capacity, and apparently duplicated infrastructure data.

For these reasons, **I request that Barbadoes Island be removed from further consideration as a PATER priority energy redevelopment candidate.**

Thank you for your consideration.

Respectfully submitted,

David Conway
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October 13, 2026