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JASON M. BOBST

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Public Comment – PUC PATER Study / Barbadoes Island

Good afternoon. My name is Jason Bobst, and I serve as Township Manager for West Norriton Township, Montgomery County.

On behalf of West Norriton Township, I appreciate the opportunity to provide comments regarding the Pennsylvania Public Utility Commission's Statewide Transmission and Energy Redevelopment Analysis, or PATER, and specifically the inclusion of the former Barbadoes generating station on Barbadoes Island in West Norriton Township as one of the 21 candidate redevelopment sites being evaluated.

West Norriton recognizes the Commonwealth's need to address energy reliability, transmission capacity, and economic development. However, the Township has significant concerns regarding the suitability of Barbadoes Island for intensive redevelopment, particularly a data center, large-load facility, new generation facility, battery energy storage facility, or a combination of these uses.

The PUC's own preliminary analysis identifies conditions at Barbadoes Island that we believe require substantially greater scrutiny before the site is advanced for further consideration.

Our foremost concern is flooding and the fundamental suitability of this location for critical infrastructure.

Barbadoes Island is located in the Schuylkill River, and the PATER report identifies the site as being within the FEMA floodway. Any proposal involving substantial new buildings, electrical infrastructure, generators, batteries, fuel systems, or other critical infrastructure must therefore be evaluated against the realities of flooding and the need for long-term resiliency.

There is an especially important fact that should be considered as part of this analysis: PECO is already undertaking a project to retire and relocate its existing Barbadoes Island Substation because of the substation's vulnerability to flooding.

PECO's project will move the substation off Barbadoes Island to a new location outside the FEMA floodway, between the Dartmouth Hills neighborhood in King of Prussia and the Schuylkill River, with completion expected by 2029. Published reporting concerning the project

• 1630 W. Marshall Street • West Norriton, PA 19403 •
Phone: (610) 631-0450 • Fax: (610) 630-0304

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explains that the existing equipment has experienced flooding and that the relocation is intended to improve the resiliency of this critical electrical infrastructure.

That raises an important and very basic question for the PUC's redevelopment analysis:

If existing critical electrical infrastructure is being removed from Barbadoes Island and relocated outside the floodway specifically because of flooding and extreme-weather concerns, why should the Commonwealth simultaneously identify Barbadoes Island as a priority candidate for new energy-intensive development or critical electrical infrastructure?

Before Barbadoes Island advances further in the PATER process, we believe that question must be thoroughly addressed.

The Township is concerned that promoting substantial redevelopment on the island could introduce new infrastructure—and potentially significantly more valuable and complex infrastructure—into the same flood-prone environment from which PECO is currently moving critical equipment.

This concern is particularly significant if the potential use is a data center, battery energy storage facility, natural-gas generating facility, or a co-located generation and large-load project. These facilities can involve extensive electrical equipment, backup generation, fuel supplies, battery systems and other infrastructure where resiliency and uninterrupted emergency access are critical.

Our second concern involves the environmental characteristics of Barbadoes Island.

The PATER report identifies confirmed groundwater contamination at the site. Before the Commonwealth encourages redevelopment, there should be a much more detailed understanding of existing environmental conditions and the consequences associated with disturbing the property.

The environmental analysis should extend beyond contamination. This is an island within the Schuylkill River. Any significant redevelopment should evaluate impacts on the river, floodplain and floodway, wetlands and riparian areas, wildlife habitat, stormwater runoff, water quality and the cumulative effects of construction and long-term operation.

The Township is also concerned about the potential effect of development on the movement and storage of floodwaters. Any proposal involving substantial buildings, fill, grading, road improvements or other improvements on the island should be evaluated not only for whether the development itself can withstand flooding, but also for whether it could worsen flooding elsewhere.

Our third major concern is access.

Barbadoes Island has inherent access limitations. The PATER study emphasizes proximity to transmission infrastructure, transportation and utilities as advantages of former generating sites.

However, proximity to infrastructure does not necessarily mean that a site can safely accommodate the intensity of development contemplated by this study.

A major data center, generating facility, battery-storage installation or similar development could require substantial construction traffic, heavy equipment, oversized deliveries, employees, contractors, maintenance vehicles and emergency apparatus.

The Commonwealth should determine whether the existing access to Barbadoes Island can safely and reliably accommodate those demands and, critically, whether adequate secondary emergency access exists.

The Township is particularly concerned about what happens during a significant flood or other emergency. If access to the island becomes limited or impossible during the very conditions most likely to create an emergency, firefighters, police, EMS personnel and utility crews could face serious obstacles responding to an electrical fire, battery event, natural-gas emergency, hazardous-material incident or medical emergency.

Again, PECO's decision to relocate its substation away from the island provides important real-world evidence that these resiliency concerns should not be treated as hypothetical.

The Township is also concerned that the PATER analysis may place substantial weight on the existence of the former generating station and legacy electrical infrastructure without giving equal consideration to whether the location itself remains appropriate for modern intensive development.

The former Barbadoes plant had approximately 248 MW of generating capacity, and the PATER study identifies approximately 65 acres on the primary parcel with additional nearby acreage. The study is considering redevelopment configurations involving generation, large electrical loads—including data centers—and co-located generation and load.

These could represent projects of an entirely different scale, intensity and technological character than the historic use of this property.

West Norriton Township therefore respectfully requests that the PUC not presume that the historic use of Barbadoes Island for electrical generation, or the presence of legacy transmission infrastructure, establishes that the island is an appropriate location for future intensive energy development.

In fact, the ongoing relocation of PECO's substation suggests that the opposite question deserves serious consideration: whether climate resiliency, flood risk and emergency-access considerations make Barbadoes Island less appropriate for critical infrastructure today than it may have been when the original generating facilities were constructed.

Before Barbadoes is considered for advancement into the 5–7 priority sites contemplated in Part B, West Norriton Township respectfully requests a detailed, site-specific evaluation of floodway and floodplain impacts, the history of flooding on Barbadoes Island, PECO's reasons for

relocating the existing substation, environmental and groundwater conditions, emergency and secondary access, bridge and roadway capacity, stormwater and river impacts, emergency-response capabilities, water and utility requirements, and the cumulative impacts of large-load or generation development on the surrounding West Norriton community.

We further request that West Norriton Township be recognized as a direct municipal stakeholder and included in all future discussions, site visits, technical evaluations and stakeholder meetings concerning Barbadoes Island. The PATER report states that Part B will incorporate stakeholder engagement as the 21 candidate locations are narrowed to approximately 5–7 priority sites. PUC Redevelopment Analysis

West Norriton Township is not opposed to responsible economic development, investment in Pennsylvania's electrical grid, or efforts to improve energy reliability. However, development must be appropriate for its location.

Barbadoes Island is not simply a vacant former industrial property. It is an island in the Schuylkill River, located within a FEMA-designated floodway, with documented groundwater contamination, constrained access, and an existing electrical substation that PECO itself has determined should be relocated away from the island because of flooding concerns.

Those facts deserve substantial weight in the PUC's evaluation.

The Township respectfully requests that the PUC fully evaluate these issues and consult directly with West Norriton Township before Barbadoes Island advances any further in the PATER redevelopment process.

Thank you for the opportunity to provide these comments.