



ENVIRONMENTAL
HEALTH PROJECT
DEFENDING PUBLIC HEALTH SINCE 2012



Pennsylvania Statewide Transmission and Energy Redevelopment
Analysis for the Commonwealth of Pennsylvania, PART A
Preliminary Assessment of Potential Opportunities (PATER)

Docket: M-2026-3059601

To Whom It May Concern:

The Pennsylvania Public Utility Commission (PUC) is evaluating redevelopment opportunities at former energy generation sites in the Pennsylvania Transmission and Energy Redevelopment (PATER) report - Part A¹. The report evaluates 21 sites using more than 60 attributes to identify promising redevelopment opportunities. However, environmental justice considerations were not included among the evaluation criteria, leaving a concerning gap in the assessment of these sites and their surrounding communities.

In addition to engaging community stakeholders, redevelopment planning should account for historical pollution burdens, potential health risks, socioeconomic conditions, and the needs of nearby residents. The Pennsylvania Department of Environmental Protection's PennEnviroScreen² tool provides a data-driven framework for assessing environmental burdens and pollution characteristics that can help identify communities facing disproportionate environmental and health impacts.

We assessed the 21 former power generation sites identified in PATER Part A utilizing PennEnviroScreen to better understand the environmental justice implications. Our analysis found:

¹ https://www.puc.pa.gov/media/4070/pater_preliminary_report-part_a_rev1_09302026.pdf

² <https://gis.dep.pa.gov/PennEnviroScreenPennEnviroScreen/>

- 11 of the 21, or 52%, of the sites under consideration are directly located in environmental justice communities, and
- 14 of 21, or 67%, of the sites under consideration have adjacent environmental justice communities
- **7 of the 21, or 33%, of the sites are in the 94th–98th percentile for pollution burden, pointing to exceptionally high pollution burdens relative to other Pennsylvania communities³**

These findings demonstrate why environmental justice must be incorporated into the PATER evaluation process. Although air pollution is a threat to everyone, some people and neighborhoods have been harmed more than others and experience elevated environmental burdens and health vulnerabilities. Exposure to air pollution is associated with serious health risks including heart disease, respiratory illnesses, and cancer. Environmental justice communities should be protected from additional pollution from future development.

The redevelopment of former energy generation sites presents an opportunity to address these inequities rather than perpetuate them. The PUC should explicitly incorporate environmental justice screening, cumulative pollution burdens, public health considerations, and meaningful community participation into its redevelopment recommendations. Communities already experiencing disproportionate environmental burdens should not face additional pollution from new polluting industrial development, including fossil fuel fired electricity sources that supply power to the grid or directly to data centers.

Pennsylvania should prioritize meeting future energy needs through energy efficiency, demand flexibility, advanced transmission technologies, virtual power plants, and distributed energy resources wherever feasible. Where new generation or storage is necessary, redevelopment plans should prioritize low-emission options, including battery energy storage, solar, and wind power. These clean options can help meet growing electricity demand without adding to the pollution burdens of

³ TABLE 1 – PATER Identified Redevelopment Sites Environmental Justice Concerns

already impacted communities, while providing affordable, reliable energy that can be deployed quickly.

Redevelopment decisions should not simply maximize a site's economic or energy development potential. They should also deliver tangible benefits to surrounding communities, reduce pollution burdens, and avoid creating new environmental and public health risks.

The health and wellbeing of Pennsylvania's families must be central to decisions about the Commonwealth's energy future. Every family deserves clean air to breathe, clean water to drink, and a healthy neighborhood to call home. The PATER report should help deliver that future, particularly for communities that have borne the greatest share of environmental burdens.

Sincerely,

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TABLE 1 – PATER Identified Redevelopment Sites Environmental Justice Concerns*Source: PATER report, p. 23*

Site	Address	Fuel	Retired capacity	EJ at site	PES score	Pollution burden at site	Adjacent EJ
1. AES Beaver Valley Partners	394 Frankfort Rd. Monaca, PA	Coal	149 MW	no	60th	94th	yes
2. Armstrong Power Station	108 Power Plant Rd, Adrian, PA	Bituminous coal	326.4 MW	no	53rd	25th	yes
3. Barbadoes Power Station	1 Haws Ave, Norristown, PA	Natural gas	248.1 MW	yes	86th	98th	yes
4. Cambria Cogeneration Facility	243 Rubisch Rd. Ebensburg, PA	Waste coal	98 MW	no	34th	14th	no
5. Cromby Generating Station	100 Cromby Rd. Phoenixville, PA	Bituminous coal	420.2 MW	no	48th	95th	yes
6. Elrama Power Plant	30 Duquesne Light Dr., Elrama, PA	coal	510 MW	yes	87th	98th	yes
7. Erie Mill	1540 East Lake Rd. Erie, PA	Bituminous coal	44.5 MW	yes	97th	98th	yes
8. F R Phillips	200 McGovern	Bituminous	410 MW	yes	80th	83rd	yes

	Blvd, Glenwillard, PA 15046	coal					
9. Hatsfield Ferry Power Station	2907 E Roy Furman Hwy, Carmichaels, PA 15320	Bituminous coal	1,728 MW	yes	89th	78th	yes
10. Jefferson Smurfit Corp JSC	5000 E Flat Rock Philadelphia, PA	Distillate fuel oil	12 MW	yes	49th	98th	no
11. Jenkins	41°16'56.6"N 75°48'59.2"W	Distillate fuel oil	32 MW	yes	86th	80th	yes
12. Lock Haven (PENNPOW)	41°07'08.0"N 77°28'15.7"W	Distillate fuel oil	18.5 MW	yes	83rd	71st	yes
13. Martins Creek LLC Harwood	40°56'07.0"N 76°01'42.4"W	Distillate fuel oil	32 MW	yes	86th	60th	yes
14. Milesburg	285 Commercial St, Milesburg, PA	Distillate fuel oil	46 MW	no	10th	4th	SCHOOL
15. Mitchell Power Station	50 Electric Way, New Eagle, PA	Bituminous coal	448.6 MW	yes	91st	98th	yes
16. North East Cogeneration Plant	10915 Ackerman Ln, North East, PA	Natural gas	157.8 MW	no	26th	16th	no
17. Piney Creek	336 Power Ln, Clarion, PA	Waste coal	36.2 MW	yes	84th	63rd	yes
18. Stanton	1733 PA-92, Harding, PA	Coal	140 MW	no	15th	11th	yes
19. Wayne	3590 Franklin Pike,	Distillate fuel oil	53 MW	no	44th	23rd	no

	Cochranton, PA						
20. West Shore	1421 Arcona Rd, Mechanicsburg, PA	Distillate fuel oil	37 MW	no	19th	51st	yes
21. Williamsburg	774 Juniata River Rd, Williamsburg, PA	Bituminous coal	43.3 MW	no	9th	51st	no