



Greater Norristown Area

October 12, 2026

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Public Comments on PATER Preliminary Phase 1 Report — Docket M-2026-3059601

Dear Secretary Homsher and Commissioners:

The NAACP Greater Norristown Area Unit 2277-B respectfully submits these comments concerning the Pennsylvania Accelerated Transmission and Energy Redevelopment (PATER) Study. We recognize the importance of assessing Pennsylvania's future energy and infrastructure needs. Our Unit does not presently endorse or oppose any individual redevelopment project. We do, however, ask that environmental justice, public health, and worker safety be central, transparent considerations before any candidate site advances.

As the preliminary list of 21 former power-generation sites is narrowed, we request a consistent, publicly documented assessment of all candidate locations, including the following:

- **Environmental legacy and resiliency:** Known or suspected contamination, coal ash or other legacy wastes where present, surface-water and groundwater risks, floodplain exposure, emergency access, and the feasibility and responsibility for remediation.
- **Equity and cumulative community impacts:** Comparable site-area demographic and socioeconomic indicators; existing pollution burdens; and the potential for additional air emissions, water demands, noise, traffic, or other impacts under reasonably foreseeable future uses.
- **Worker protection:** A preliminary screen for hazards to demolition, construction, excavation, remediation, maintenance, and future operations personnel, together with requirements for detailed, site-specific occupational exposure assessments and safety plans before work begins, including applicable OSHA standards.
- **Objective selection and public participation:** Published screening criteria, how criteria are weighted, the evidence supporting each site's evaluation, meaningful engagement with nearby residents and workers, and opportunities to comment before the priority-site list is finalized.

Barbadoes Island in West Norriton Township warrants particular attention. The Township's October 13 agenda identifies a FEMA-designated floodway, confirmed groundwater contamination, and PECO's planned relocation of its substation outside the floodway for resiliency reasons. We request a clear explanation of how these conditions will affect the site's screening and how similar warning signs at other candidate sites will be evaluated under the same standards.

We respectfully request that the Commission make site-by-site screening results and the rationale for advancement publicly available; identify additional studies required before any redevelopment decisions; provide an opportunity for informed community participation; and issue a written response describing how environmental justice and worker safety will be incorporated. Please include this submission in the official record for Docket M-2026-3059601.

Thank you for your consideration.

Sincerely,

Terri-Ann Sidberry
President
NAACP Greater Norristown Area Unit 2277-B

cc: The Honorable Josh Shapiro, Governor of Pennsylvania