

DANIELLE FRIEL OTTEN, MEMBER
155TH LEGISLATIVE DISTRICT

34 EAST WING
P.O. BOX 202155
HARRISBURG, PENNSYLVANIA 17120-2155
(717) 783-5009
FAX: (717) 772-2943

631 POTTSTOWN PIKE
EXTON, PENNSYLVANIA 19341
(484) 200-8259
TOLL-FREE: (833) 787-3176
FAX: (484) 200-8269



House of Representatives
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

COMMITTEES

EDUCATION
ENVIRONMENTAL & NATURAL RESOURCE PROTECTION
GOVERNMENT OVERSIGHT
HEALTH
HUMAN SERVICES
LIQUOR CONTROL

October 14, 2026

Mr. Stephen M. DeFrank, Chairman
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Docket Number [M-2026-3059601](#)

Dear Chair DeFrank,

Thank you for the opportunity to comment on Phase 1 of the Pennsylvania Accelerated Transmission and Energy Redevelopment (PATER) Study.

Pennsylvania's urgent electric reliability challenges and ongoing market volatility require a multi-pronged approach at the state and regional level, ranging from PJM reform to residential ratepayer protections to siting reform and additional generating capacity.

As such, I respect the Public Utility Commission's work to identify locations of decommissioned power plants for possible redevelopment. The PATER Part A report does recognize that public health, community acceptance, and environmental conditions can affect whether a site can be redeveloped (Section 8.3: Key Risks). But the report treats those factors only as risks to project viability and explicitly excludes the environmental impacts of future end uses, such as air emissions, water use, and wastewater generation, from its scope. The report asks how these factors might hinder redevelopment, but not how redevelopment might affect the communities around these sites.

As PATER moves into Part B, I urge the commission to incorporate the principles of my House Bill 2184, which passed the House with a bipartisan 150-53 vote on Sept. 29, 2026, as scoring criteria in the site rankings. This bill would require the commission to consider factors such as affordability, reliability, resilience, public health, environmental and economic impacts, energy efficiency, transparency, and equitable treatment of customers to determine whether a decision is in the public interest.

It is imperative that the public interest be considered as the process to identify five to seven likely redevelopment targets moves forward. In this proceeding, the commission has the

discretion to incorporate these factors into its deliberations without waiting for legislative action. Taking the initiative would both ensure a better result and increase public confidence in the process.

Additionally, the commission must ensure that any brownfields redevelopment gives the needs of ratepayers at least equal consideration with the needs of large-load customers. For instance, if part of a plant's output is dedicated to a power purchase agreement, excess output must be offered into the EDC's default service procurement at terms no less favorable than the PPA. Large-load customers should not secure price certainty from a redeveloped site while residential and small business customers absorb market volatility.

Part B should also identify who pays for the transmission upgrades needed at each priority site. When upgrade costs flow through PJM's Regional Transmission Expansion Plan, residential customers carry a share of the bill. The study should estimate the ratepayer share for each site. Upgrade costs triggered by large-load customers should be assigned to those customers, consistent with the principles of House Bill 1834.

Several of the 21 sites previously burned coal, coal waste or fuel oil. Reactivating these sites would affect air quality well beyond the property line. The study should evaluate cumulative air emissions at each priority site and flag sites in or near environmental justice areas using DEP's PennEnviroScreen tool.

Existing interconnection and transmission access hold value regardless of fuel source. For each priority site, the study should evaluate clean repowering options, including battery storage, solar paired with storage, and lower-emitting generation, alongside transition to natural gas.

The study should also account for water availability at each site, including withdrawal limits set by DEP and the applicable river basin commissions, especially where data center co-location is proposed.

Communities near these sites deserve a voice before decisions are made. I urge the commission to notify host municipalities and counties before any site advances to the priority list, hold public input sessions in the regions where priority sites are located, and publish the scoring methodology and weights used to rank sites.

I look forward to continued engagement with the commission and stakeholders as the study continues.

Sincerely,

A handwritten signature in black ink, reading "Danielle Friel Otten". The signature is fluid and cursive, with the first name "Danielle" being the most prominent part.

Danielle Friel Otten
State Representative
155th Legislative District