



October 14, 2026

Docket # M-2026-3059601

Pennsylvania Accelerated Transmission and Energy Redevelopment (PATER) Study

Dear Pennsylvania Public Utility Commissioners:

I urge you to take the PATER study and recycle it, because you get the wrong answers when you ask the wrong questions.

1) Do we need more electricity and why?

As the study points out on page 8, Pennsylvania is the nation's #1 exporter of electricity, exporting nearly 89 million MWh in 2025. This has been the case for many years. We export about twice as much electricity as the second largest electricity exporter (Alabama).

Similar to Pennsylvania's status as the nation's largest importer of trash to be buried and burned in our landfills and incinerators, Pennsylvania gets the environmental harm and other states get the benefits. This abusive relationship needs to end.

Virginia is the nation's largest importer of electricity. Except for West Virginia, which is also a net exporter, all of our neighboring states are not meeting their own electricity needs, either. Pennsylvania has no obligation to increase its already excessive electricity generation when this excess generation already is sufficient to meet the expected demand growth in our state. PPL, one of the largest electric utilities in PA, expects to see its summer peak load demand jump more than 60% by 2030.¹ The electricity we export is already enough to meet this demand, and Pennsylvania can choose to let nearby states pull their weight so that we can use our Pennsylvania generation for our own needs.

Are the *needs*, though? It seems the main driver of this "need" is the mad rush to build over 100 new data centers, many of the hyperscale AI variety. This is a speculative bubble that is extremely unpopular and also unnecessary. Pennsylvanians across the political spectrum do not want to

¹ Inside Climate News, "Data centers drive higher forecasts for electric demand in Pa., sparking climate worries – The projected increase, part of a nationwide trend, could mean more use of fossil fuels," March 3, 2025. <https://penncapital-star.com/uncategorized/data-centers-drive-higher-forecasts-for-electric-demand-in-pa-sparking-climate-worries/>

see their power prices keep rising, their water used up, their fields paved over, and their peace disturbed with noise in order to serve billionaires and their tech companies as they use the data centers to spy on us, arrest our neighbors, and murder children in Gaza and Iran. Even if there weren't a significant existential risk from the AI architecture being developed, the political disruption, the devastation of most people's jobs, and the many other social implications of unregulated AI are enough reason to halt this undemocratic development.

The Public Utility Commission should not be obliged to serve wanton energy-hogging data center (or crypto mining) development. In fact, the PUC has an obligation under Article 1 § 27 of the Pennsylvania Constitution to protect the people's right to clean air and pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. The PA Supreme Court has made it clear that all levels of our government from state to local, share in this obligation to conserve and maintain Pennsylvania's public natural resources for the benefit of all the people. Anything that flies in the face of this is literally unconstitutional.

2) How can we best meet our electricity needs?

There is a Clean Energy Hierarchy. Just as there is a Zero Waste Hierarchy that expands on the well-known "Reduce, Reuse, Recycle" framework (I'd know... I developed it... see www.zwia.org/zwh), there is a Clean Energy Hierarchy that resembles it. Instead of reduce, reuse, recycle, compost as the main components, it starts with conservation (like reduce), efficiency (like reuse), then solar, wind and energy storage. Do an adequate job at these steps and no combustion-based or nuclear generation is necessary. For the sake of our environmental rights, climate and environmental justice, and even our economy, it's imperative that we move beyond nuclear power and all forms of combustion to meet our energy needs, starting with the electricity sector, since the transportation and heating sectors will need to be electrified to end their use of combustible fuels.

The PUC could, instead of scoping out communities to rebuild power plants, be developing the public policies needed for the quick and most effective just transition to the Clean Energy Hierarchy. This means deep demand reductions by prioritizing conservation and efficiency before new generation, so that the electrification of the transportation and heating sectors can take place without having to massively increase electricity generation in our Commonwealth.

The PATER study talks about the 4.8 GW of retired capacity in the state, but doesn't discuss the huge amount of solar and storage sitting in the PJM queue to be developed in Pennsylvania. A February 2026 Reuters [article](#) discusses how "solar accounted for 7.2 GW of the 14.7 GW of power projects in Pennsylvania's grid queue in May 2025 that were active or had a connection agreement with network operator PJM, followed by 3.1 GW of energy storage."

The PATER study makes the mistake of pretending the future looks like more centralized power generation. How many of us use landlines and pay phones anymore? Technology has decentralized and we're all now attached to cell phones. Centralized power generation is the old world. Instead of a handful of major power generation sites, we need to open the floodgates to

allow the decentralized solar and storage to flood into our state – not so we can empower data centers or meet other states’ needs, but to back down the remaining 7% of our generation that still comes from coal, the whopping 30% that still comes from nuclear power, and eventually also eliminate the 59% that is coming from the destruction of our communities with fracking for gas.

3) Dirty energy unacceptable and unaffordable

Combustion-based power (coal, waste coal, oil, gas, biomass and trash burning) and nuclear power are all very dirty forms of energy. I could write a book backing up these assertions, but if you haven’t learned the truth of this statement yet, you’re not a person who should be in charge of our energy future. If you’re familiar with the price trends over time, you’ll also understand the truth that trash and biomass burning and nuclear power are among the most expensive forms of energy we have, and that fossil fuels are getting more costly over time. Add in the externalized costs, and there’s no question that we need to be backing away from anything with a fuel to be extracted, consumed, and disposed of.

Small modular reactors (SMRs) are probably the most egregious false solution mentioned in the PATER study. These fictional reactors make more waste and cost more than conventional nuclear reactors, which are already the most expensive and damaging form of power that we have, not to mention the most racist (if you follow where the uranium comes from and where the waste goes). It’s also quite slow to develop. For anyone reading this who is unclear about SMRs, please start reading up on it. Here are a few of many starting points:

<https://www.ewg.org/news-insights/news/why-small-modular-nuclear-reactors-wont-help-counter-climate-crisis>

<https://www.nirs.org/small-modular-reactors-not-safe-not-the-answer/>

<https://beyondnuclear.org/new-talking-points-smrs/>

<https://www.linkedin.com/posts/joe-romm-1053841-please-repost-the-dumb-money-is-doing-nuclear-share-7388282994215628800-JJmo/>

4) Siting, environmental justice and energy democracy

Many of the power plants at the sites discussed in the study have already been demolished. Getting the permits to build new nuclear or combustion-based centralized power plants at these sites will be welcomed by protracted legal battles and community resistance.

Some of these sites are environmental justice communities, and are inappropriate to target with new polluting facilities of any sort (as if anywhere is appropriate... it’s not, but especially not EJ communities!).

These communities could be welcomed into the decision-making process – one that is bottom-up, not top-down. Rather than imposing the state’s will on communities that don’t want polluting power plants returning as neighbors, let them start with whether there is a need, who that need is for, and if there’s agreement on the need, engage the community on how to best meet that

need, and whether it must be centralized, whether it must be in Pennsylvania, whether it can be met with demand reduction instead of new generation, and if new generation is necessary, how to best apply the Clean Energy Hierarchy and what role their community might want to play in that sort of economy.

Energy democracy isn't how the PUC historically operates, but it's never too late to rethink and redesign how things are done in our state. Because no one is going to put up with this awful plan any more than Pennsylvanians welcome data centers or misguided policies like [House Bill 502](#) which was designed to enable these power plants to be crammed down our throats by taking away local governing powers.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Ewall', with a stylized, flowing script.

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