



PENNSYLVANIA STATE ASSOCIATION OF TOWNSHIP SUPERVISORS

October 14, 2026

Pennsylvania Public Utility Commission  
Keystone Building  
400 North Street Keystone Bldg.  
Harrisburg, PA 17120

**RE: Doc. No. M-2026-3059601**

Thank you for the opportunity to submit comments on the Pennsylvania Accelerated Transmission and Energy Redevelopment (PATER) Part A preliminary report. The Pennsylvania State Association of Township Supervisors (PSATS) represents Pennsylvania's 1,453 townships of the second class and is committed to preserving and strengthening township government and securing greater visibility and involvement for townships in the state and federal political arenas. Townships of the second class cover 95% of Pennsylvania's land mass and represent more residents — 5.7 million Pennsylvanians — than any other type of municipality in the commonwealth.

PSATS recognizes the potential benefits of redeveloping former generation facilities, utilizing existing transmission infrastructure, and supporting Pennsylvania's growing energy needs. However, as the study advances, we implore the Commission to ensure that municipal land-use authority and local infrastructure considerations remain integral to the redevelopment process.

As Part B narrows the 21 candidate sites to approximately five to seven priority locations, we encourage direct engagement with affected townships before final site selections are made. Township officials possess valuable knowledge of local infrastructure limitations, land-use conditions, and community concerns that may not be fully captured through technical assessments. Municipal participation should be incorporated into the evaluation process rather than occurring only after redevelopment priorities have been established

Additionally, the report acknowledges that additional transmission upgrades may be necessary to accommodate proposed generation or large electrical loads. These improvements may extend beyond the municipalities hosting the redevelopment sites. Transmission line upgrades, substation expansions, or related infrastructure could affect neighboring townships through construction activity, impacts on municipal roads, and land-use considerations. PSATS encourages the Commission to identify potentially affected municipalities during Part B and facilitate early coordination with local officials.

Further, the identification of a site as technically suitable for energy redevelopment should not be interpreted as a determination that any proposed use is necessarily compatible with existing municipal zoning ordinances or surrounding land uses. Former generation facilities may present opportunities for redevelopment into substantially different uses, including data centers.

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The report acknowledges that potential environmental impacts associated with specific redevelopment uses were outside the scope of Part A. As the study progresses, PSATS encourages the commission to ensure that redevelopment priorities do not supersede applicable municipal zoning and land-development requirements, and that affected townships retain a meaningful role in evaluating the compatibility of proposed uses with their communities.

Thank you for the opportunity to submit comments on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "David M. Sanko". The signature is fluid and cursive, with the first name "David" being more prominent.

David M. Sanko  
Executive Director