



October 14, 2026

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

To the Pennsylvania Public Utility Commission Chairman and Commissioners,

Please accept these comments on behalf of PennFuture and its members who receive their electricity from public utilities and have a direct stake in the PA Public Utility Commission's assessment of the state's existing grid infrastructure, generation and capacity, and the potential redevelopment of decommissioned fossil fuel power plant sites. PennFuture is a statewide environmental organization that advocates for an equitable, job-creating state economy by advancing clean air, pure water, and climate change solutions through legal advocacy, policy engagement, and empowering all Pennsylvanians. This comment is in response to the PATER Study at **Docket No. M-2026-3059601**.

This long overdue assessment comes at a time when Pennsylvanians are facing dual crises—that of affordability and energy—and the state's economic development entities are focused on attracting energy intensive industries such as data centers to Pennsylvania. The expressed purpose of the entire PATER project is to deliver insights “in a form that supports action by the Commonwealth and the PJM Interconnection (PJM)”¹ regarding “three critical factors: 1) where infrastructure enables or constrains growth, 2) which sites offer the highest redevelopment value, and 3) which investments best balance reliability, cost, and economic impact.”² It is unclear for whom “the highest redevelopment value” is prioritized or how “economic impact” is defined, but given the report's repetitious mention of energy-intensive industries, it is likely safe to assume that everyday Pennsylvanians are not the party being prioritized.

In June of 2025, PennFuture submitted comments in response to the PUC En Banc Hearing on Interconnection and Tariffs for Large Load Customers at **Docket No. M-2025-3054271**. In those comments, we argued, “The Commission must resist this false sense of urgency that will lead utilities to shift their focus away from serving the needs of everyday Pennsylvanians to that of serving a select few wealthy, energy-hungry companies. Such a shift—if unmitigated—would

¹ Key Logic Systems, LLC and EPRI, [“Statewide Energy and Transmission Redevelopment Analysis for the Commonwealth of Pennsylvania PART A—Preliminary Assessment of Potential Opportunities”](#), September 2026, 8.

² Key Logic Systems, LLC and EPRI, [“Statewide Energy and Transmission Redevelopment Analysis for the Commonwealth of Pennsylvania PART A—Preliminary Assessment of Potential Opportunities”](#), September 2026, 8.

directly result in ballooning prices for existing ratepayers, as well as increasing challenges to reforming inefficient utility practices and extraneous infrastructure investments.”

In those same comments, we also warned against the potential economic impacts that would fall to everyday Pennsylvanians if PJM did not develop a robust large load tariff.

“The current rate structure is not prepared to balance costs of the large load demand of data center facilities and the economic realities of existing ratepayers, who will carry the costs associated with the additional distribution and transmission infrastructure required for these facilities... Instead of existing ratepayers’ bills being determined by the average cost of providing electricity to similar ratepayers, these large load customers could pay reduced, individualized rates that are customized for their consumption and business, leaving everyday Pennsylvanians to fill in the gap.”

FERC’s recent rejection of PJM’s large load interconnection plan highlights the heightened economic risk to ratepayers of building massive, energy-intensive projects like data centers in light of the jurisdictional uncertainty between these two entities. We caution the Commonwealth, for its part, to maintain focus on the reliability, resiliency, and efficiency of transmission infrastructure and optimizing the development of renewables and battery storage when proceeding to Part B of this study.

The decisions made as a result of the PATER Study will have sweeping impacts on the state’s grid, energy mix, and economy. The overlapping energy and affordability crises raises the stakes for the findings of the PATER Study, as a whole, and therefore, we advise that the Commonwealth proceed with caution and an eye towards protecting the economic and environmental interests of Pennsylvanians.

Accordingly, PennFuture raises the following concerns regarding Part A’s public comment process, claim of technological and fuel neutrality (this report is not meant to be “prescriptive”), site assessment, environmental issues, and potential economic impacts.

1. The Public Comment Process Was Too Truncated To Be Meaningful.
 - a. The comment period, itself, is an issue of concern. While the period technically began when the report was published on September 28, 2026 the notice was not published until October 3. Additionally, the meeting in which the presentation took place did not occur until October 7.
 - i. It is unreasonable to expect that the public would be able to process a lengthy, technical report and a lengthy presentation by experts in order to effectively draft meaningful comments by October 14.
2. The Study’s Claim of Technological and Fuel Neutrality is Not Credible, and the Report is Biased Towards Fossil Fuel-Based Generation as a Result.
 - a. The assessment’s focus on generation per acre effectively excludes solar and wind from consideration as future redevelopment options. Land adjacent to the site which may be available for redevelopment, as well, is not considered within the

scope of this assessment,³ which further reduces the likelihood of renewables being perceived as a viable option.

- b. While expanding the third assessment to include fossil fuel generation that PJM expects to enter service by 2030, the study did not similarly consider solar and storage projects in the PJM queue.⁴
- c. Gas plants tend to be unreliable during extreme weather events. It takes at least 5 years to build a gas power plant. Gas turbines are on backorder for 5 years or more. Gas-fired power plants are only getting more expensive to build. Meanwhile, the cost of solar panels is decreasing; a solar array can be built within twelve months, and the renewable energy industry is growing. Despite these known limitations with gas-fired generation and these known benefits of the renewable energy industry, proximity to gas infrastructure and the Marcellus Shale formation were primary considerations throughout the assessment.
 - i. The relatively inexpensive nature of renewables can contribute to cost suppression, but that is never explicitly named in the report.
- d. The Commonwealth's engagement with the PA Energy Horizons Cross-Sector Collaborative throughout this process is concerning and does not instill trust in claims that this assessment is not meant to be "prescriptive" in the determination of site use.
 - i. While [PA Energy Horizons Cross-Sector Collaborative](#)⁵ claims to work towards decarbonization of the energy grid, their primary focus is on hydrogen production and CCUS, and their website highlights the enormous amount of gas that lies within the Marcellus Shale formation.
 - ii. Neither hydrogen nor CCUS technology has been proven at-scale. Consequently, it does not instill confidence that an organization focused on promoting these unproven and gas-based technologies had so much influence over a study of this type, scale, and import.
 - 1. One example of our reason for concern can be found on page 58: "The analysis considers both generation hosting capacity and load hosting capacity, recognizing that future redevelopment could involve new generation resources, large industrial loads, data centers, **hydrogen production facilities**, or hybrid configurations

³ Key Logic Systems, LLC and EPRI, ["Statewide Energy and Transmission Redevelopment Analysis for the Commonwealth of Pennsylvania PART A—Preliminary Assessment of Potential Opportunities"](#), September 2026, 80.

⁴ Key Logic Systems, LLC and EPRI, ["Statewide Energy and Transmission Redevelopment Analysis for the Commonwealth of Pennsylvania PART A—Preliminary Assessment of Potential Opportunities"](#), September 2026, 66.

⁵ PA Energy Horizons Cross-Sector Collaborative, <https://pennsylvaniaenergyhorizons.org/>, last accessed October 13, 2026.

that combine multiple uses.”⁶ The Commonwealth does not have significant hydrogen production and it is our understanding that there is not significant hydrogen production planned. It is absurd to include this nonexistent industry as a factor in this analysis.

3. The Site Selection Process Was Biased Towards Data Center Development and Did Not Include Sufficient Consideration of Zoning and Flood Risks.

- a. While FEMA considers many of these sites to have a “low” flood risk, many of them are located within floodplains. The assessment must take that as a serious risk to certain kinds of redevelopment.
- b. Some sites are “not zoned” or the zoning is “not listed.”
 - i. What’s the difference between these two labels?
 - ii. The assessment needs to give serious weight to the consequences of potentially building an energy generating facility on a site that is not zoned because the local municipality will not have the authority to place appropriate limitations or restrictions on that development.
 - iii. There is at least one site that is “zoned residential.”
 1. This zoning is simply inappropriate for the development of a gas plant or nuclear power plant, and the local municipality and/or county should be contacted and informed.
- c. The assessment specifically identifies which sites are large enough to accommodate hyperscale AI data centers.
 - i. This calls into question the stated purpose of this study, which is to optimize energy generation and modernize transmission infrastructure.

4. The Study Did Not Appropriately Take Environmental Issues Into Consideration.

- a. PennFuture disagrees with the argument that the study “focuses on redevelopment viability rather than specific redevelopment pathways, potential environmental impacts associated with future end uses, such as air emissions, water use, wastewater generation, and other permitting considerations, were outside the scope of this assessment.” Waiting to evaluate these environmental impacts “as part of project-specific planning and environmental review processes,”⁷ is too late. These considerations must be considered as part of the process of determining the viability of each site. Otherwise, potentially already over-burdened environmental justice communities will be forced to advocate for

⁶ Key Logic Systems, LLC and EPRI, [“Statewide Energy and Transmission Redevelopment Analysis for the Commonwealth of Pennsylvania PART A—Preliminary Assessment of Potential Opportunities”](#), September 2026, 58.

⁷ Key Logic Systems, LLC and EPRI, [“Statewide Energy and Transmission Redevelopment Analysis for the Commonwealth of Pennsylvania PART A—Preliminary Assessment of Potential Opportunities”](#), September 2026, 102.

themselves across the table from developers during the environmental review, permitting, and land use processes.

- i. For example, the Cromby site is in a region of the Commonwealth that is designated as non-attainment for ozone pollution.
 - b. Additionally, it is worth noting that the study assesses local workforce numbers and skills for each site. Impacts to local air and water quality must be taken into consideration when addressing the local workforce and economic impacts as negative health outcomes have the potential to cancel out any economic gains made by workers through employment.
5. The Economic Analysis in the Study is Neither Fuel-Neutral Nor Evidence-Based.
 - a. The study's depiction of the economic benefits of developing solar to support the grid is incomplete. While the report mentions that solar "may provide cost advantages,"⁸ it omits the fact that its low-cost and fast-to-deploy nature contribute to overall wholesale price suppression, which is a vital economic factor when assessing which form of generation to build in order to add capacity to the grid.
 - b. This study uses broad, undefined generalities as it begins the process of assessing "which sites offer the highest redevelopment value, and 3) which investments best balance reliability, cost, and economic impact."⁹
 - i. Several terms need to be more clearly defined in the interest of transparency: "highest redevelopment value," "cost," and "economic impact."
 - ii. For example, the reduction of greenhouse gas emissions in the Commonwealth should be considered part of the "highest redevelopment value" when assessing sites and potential new uses.
 - iii. Furthermore, the amount of cost savings created by investments in transmission infrastructure and developing renewable energy and battery systems should be considered and clearly outlined. It's vital that the receiver of those cost savings is highlighted—whether it is the developer, utility, power plant operator, business, or resident.
 - c. Similarly, the PATER Study is described as working "to produce prioritized, investable recommendations." The authors must define what they consider to be "investable." What characteristics must these sites or projects display in order to achieve this status?

⁸ Key Logic Systems, LLC and EPRI, ["Statewide Energy and Transmission Redevelopment Analysis for the Commonwealth of Pennsylvania PART A—Preliminary Assessment of Potential Opportunities"](#), September 2026, 84.

⁹ Key Logic Systems, LLC and EPRI, ["Statewide Energy and Transmission Redevelopment Analysis for the Commonwealth of Pennsylvania PART A—Preliminary Assessment of Potential Opportunities"](#), September 2026, 8.

- i. Specifically, what economic impacts for local workers and communities contribute to that label?
- d. It needs to be made clear that that economic assessment within this study is not technology or fuel neutral. Specifically, for the authors to say that Pennsylvania “is well-poised to pursue a balanced strategy that expands regional power supply while enabling local growth in energy-intensive industries,”¹⁰ belies the influence of DCED, Team PA, and PA Energy Horizons Cross-Sector Collaborative.
 - i. The DCED’s Energy Program is clear in its purpose to attract energy-intensive industry to the state. Recently, Team PA has released and promoted its “[Energy, Data Center, and Artificial Intelligence Roadmap](#),”¹¹ which lays out instructions for how to make data centers and AI the new foundation of Pennsylvania’s economy—all fueled by fracked gas. And, as stated earlier in these comments, PA Energy Horizons Cross-Sector Collaborative is focused on leveraging unproven CCUS and hydrogen technology to support the gas industry. It’s been well-documented that Pennsylvania counties that host fracking projects have been losing population, jobs, and wages for years¹², it is not in the state’s best interest to trust these entities to further push their gas agenda.
- e. The local workforce analysis needs to be more clearly outlined as to which industries and skills were assessed.
 - i. Occupations commonly associated with the construction and operation of the redevelopment options evaluated in this study were “identified and grouped into technology-specific workforce categories, including power generation facilities, data centers, and manufacturing redevelopments.”¹³ However, it is unclear as to whether or not the workforce associated with renewable energy generation or battery storage were considered. This is especially concerning given that “County-level workforce availability was then estimated by aggregating annual employment figures for the

¹⁰ Key Logic Systems, LLC and EPRI, “[Statewide Energy and Transmission Redevelopment Analysis for the Commonwealth of Pennsylvania PART A—Preliminary Assessment of Potential Opportunities](#)”, September 2026, 13.

¹¹ “Energy, Data Center, and Artificial Intelligence Roadmap”, Team PA, <https://teampa.com/energy/edcai-roadmap/>, last accessed October 13, 2026.

¹² O’Leary, Sean. “[Shale Gas in Pennsylvania: 2026](#),” Ohio River Valley Institute, August 5, 2026.

¹³ Key Logic Systems, LLC and EPRI, “[Statewide Energy and Transmission Redevelopment Analysis for the Commonwealth of Pennsylvania PART A—Preliminary Assessment of Potential Opportunities](#)”, September 2026, 21.

occupations included within each category.”¹⁴ Because these sites were formerly fossil fuel power plants, it is highly likely that the local workforce has skillsets appropriate for that industry. Consequently, it is less likely that the local workforce has the skills associated with renewable energy or battery storage projects. Presenting the appropriateness of a project based upon the existing skillsets of a workforce that may be historically tied to the fossil fuel industry will likely result in a gas plant being determined as the best use for these sites.

- ii. Similarly, the renewable industry is one of the fastest growing in the nation, so why not leverage this growing sector to ensure at least some of these redevelopment projects contribute to the transition towards clean energy?
- f. How are workforce limitations and material limitations taken into consideration when assessing “optimization”?
 - i. We know that there is a deficit of workers needed to build data centers across the country, and consequently, workers from other industries—like nuclear energy—are being sought after in order to fill the gaps.¹⁵
 - ii. Similarly, data center developers are experiencing a delay in receiving the materials and components needed to build data centers, like transformers. Does the competition for components of energy infrastructure, like transformers, pit the viability of grid infrastructure development against the development of gas-fired power plants or SMRs co-located with data centers?
- g. The study needs to explain how shortages in the construction and trades workforce could impact the redevelopment of these sites into thermal energy generating facilities, like gas-fired power plants or nuclear reactors. To optimize the economic benefits of jobs and wages for local and regional communities, it is vital for the labor to come from within the Commonwealth’s boundaries and not be recruited across state lines.

In the face of the overlapping energy and affordability crises, it is vital that the recommendations of the PATER Study results in redevelopment opportunities that benefit the local host communities and ratepayers across the state. PennFuture is concerned that this valuable opportunity to jumpstart the modernization and decarbonization of Pennsylvania’s grid will be cast aside in favor of

¹⁴ Key Logic Systems, LLC and EPRI, [“Statewide Energy and Transmission Redevelopment Analysis for the Commonwealth of Pennsylvania PART A—Preliminary Assessment of Potential Opportunities”](#), September 2026, 21.

¹⁵ Noone, Greg. [“Construction worker shortages could hamper the US data center buildout,”](#) Data Center Dynamics, May 19, 2026.

building expensive and polluting fossil fuel generation to serve the capital-intensive, low-employment data center buildout that is currently sweeping across the state.

Economic stability and prosperity are not the result of a massive influx of capital leveraged to build giant, controversial projects. Instead, stability and prosperity are the result of a diverse and sustainable economy that circulates money locally and reduces energy costs and pollution for Pennsylvanians.

Respectfully submitted,

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