



October 14, 2026

Matthew Homsher, Secretary
Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

**RE: Pennsylvania Accelerated Transmission and Energy Redevelopment (PATER) Study
Docket No. M-2026-3059601**

Dear Secretary Homsher,

The Keystone Energy Efficiency Alliance (KEEA) appreciates the opportunity to submit comments to the Pennsylvania Public Utility Commission (PUC) regarding the Phase 1 Pennsylvania Accelerated Transmission and Energy Redevelopment (PATER) Study.

KEEA is Pennsylvania's trade association for the energy efficiency industry. With our sister program the Energy Efficiency Alliance of New Jersey, we represent close to 80 business members across Pennsylvania and New Jersey. Our mission is to champion energy efficiency as the foundation for a clean, just, and resilient energy economy.

KEEA applauds the thorough report released by the Commission in this matter. We particularly support the notion of prioritizing retired generation and similar brownfield sites as targets for redevelopment. Many of the sites referenced in the report were once centers of economic activity in the communities they supported, and their loss has often coincided with economic downturns in those communities. To further support sustainable economic growth in Pennsylvania, KEEA offers the following suggestions.

1. Prioritize Advanced Transmission Technologies and Grid Enhancing Technologies Over New Transmission Construction

KEEA recommends that, to the extent feasible, advanced transmission technologies (ATT's) should be prioritized over new transmission construction. ATT's allow energy to flow throughout the existing grid infrastructure more efficiently and effectively. More effectively utilizing the grid that we have rather than building entirely new infrastructure would allow projects to come

online more quickly, lowering overall project costs for developers. Additionally, ATT's would decrease potential costs to ratepayers associated with new transmission buildout.

2. Prioritize Industrial Manufacturing Over Hyperscale Data Centers

KEEA recommends prioritizing redevelopment targeted at new industrial manufacturing over large computational loads. As was noted during the October 7 presentation, a potential battery gigafactory, for example, would add more than 2,000 jobs and contribute more than \$313 million to Pennsylvania's gross domestic product. A typical data center, on the other hand, will employ roughly 100-200 people long-term once the facility is constructed, and the concrete contributions to gross domestic product are uncertain at best.¹ Additionally, particularly in the case of battery production, such a facility would contribute significantly to helping Pennsylvania lead the nation in building out clean energy infrastructure.

In addition to the potential economic benefits, prioritizing manufacturing over data centers brings the added benefit of incentivizing more easily interruptible loads. As noted above, resource adequacy concerns may necessitate load shedding events to ensure the stability of the grid. The unique load profile of data centers presents challenges to them being able to take themselves off the grid without impacting their services. Manufacturing facilities, on the other hand, are not subject to the same constraints.

3. Prioritize Demand Reduction Over New Generation, and New Clean Generation Over New Load

KEEA appreciates the strategy underlying this report to prioritize re-using existing industrial sites and brownfields. However, given the current resource adequacy challenges noted in the recent PUC report, it should be essential that any efforts undertaken strive to reduce overall energy demand in Pennsylvania. This could be accomplished by, *inter alia*, requiring any projects contemplated by this study to incorporate demand response capabilities or meeting stringent building efficiency standards.

KEEA further recommends that new generation should be prioritized over new load buildout when determining which projects to move forward with. As the Public Utility Commission noted in a recent report, Pennsylvania does not currently have the generation capacity to meet PJM's resource adequacy criteria due to large load growth.² According to the report, Pennsylvania could

¹ Dany Bahar and Greg Wright. "New evidence on data center employment effects." *Brookings Institution*, Aug. 10, 2026.

<https://www.brookings.edu/articles/new-evidence-on-data-center-employment-effects/>

² Pat Knight et al., *Assessing Electricity Resource Adequacy in Pennsylvania and PJM* (Sep. 14, 2026).

begin to see reliability impacts caused by new load as soon as next year. Given this imminent concern with resource adequacy, it is incumbent that new generation should take priority over new load when identifying sites to redevelop.

4. Ensure Community Buy-In Before Commitments are Made

Finally, KEEA recommends that any redevelopment contemplated by this project, whether it be new generation or new loads, have the buy-in of the communities that they will impact. Public outreach, including stakeholder meetings and public town halls, should be held to solicit feedback on the social, economic, and environmental impacts of any proposed redevelopment.

We again thank the Commission for the opportunity to submit comments in this matter, and we look forward to continuing to engage on these matters going forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin L. Carpenter".

Justin L. Carpenter, Esq.

Policy Counsel

Keystone Energy Efficiency Alliance