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December 16, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: Joint Letter of Notification Filing of Mid-Atlantic Interstate Transmission, LLC and FirstEnergy Pennsylvania Electric Company for the Geneva–Morgan Street 115 kV GMO Transmission Line Tap Project in Greenwood Township, Crawford County, Pennsylvania


Docket No. A-2024-3052306

Dear Secretary Chiavetta:

Enclosed please find Mid-Atlantic Interstate Transmission, LLC's ("MAIT") and FirstEnergy Pennsylvania Electric Company's ("FE PA") responses to certain data requests issued by the Bureau of Technical Utility Services via the Secretary's letter, received on December 4, 2024, in the above-referenced matter.

Should you have any questions or concerns regarding this information, please feel free to contact me.

Very truly yours,



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JTC/mlr

cc: jvanorder@pa.gov, Bureau of Technical Utility Services (via electronic mail)

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QUESTION A-1

Reference the Application, Paragraph 7. Please explain whether MAIT or FE PA will be providing transmission service to the customer and provide a detailed description of each entity’s role.

Response:

To further clarify the intent of Paragraph 7, please refer to Exhibit 2 of the Letter of Notification for illustrative purposes. Mid-Atlantic Interstate Transmission, LLC (“MAIT”), as the Transmission Owner, will provide transmission service to a Point of Interconnection (“POI”) with FirstEnergy Pennsylvania Electric Company (“FE PA”), which is MAIT’s wholesale customer (see demarcation POI #1). FE PA, in turn, as the regional operating company, will extend that 115 kV service to its retail customer—the End Customer, Vitro Meadville Flat Glass, LLC (see POI #2).

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QUESTION A-2

Reference the Letter of Notification, Paragraph 8. Please provide the approximate height of existing nearby transmission structures.

Response:

The existing nearby transmission structures are approximately 75 feet in height.

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QUESTION A-3

Reference the Letter of Notification, Paragraph 12. Please explain whether Vitro Meadville Flat Glass, LLC currently takes electric transmission or distribution from FirstEnergy and, if so, please provide a detailed explanation as to why the current level of service is not adequate.

Response:

Vitro Meadville Flat Glass, LLC’s (“Vitro Glass”) current load of 6 MW is served from FE PA’s distribution system. This system is not currently designed to provide adequate service for the additional load (31 MVA) requested by this customer. To accommodate the load requested at a distribution voltage, the existing Geneva Substation would need to be rebuilt and distribution equipment dedicated solely to Vitro Glass. A rebuild would necessarily impact other customers served by this substation as outages would be required during construction. A direct connection to the transmission system, as proposed in the Letter of Notification, was therefore deemed the best solution to serve Vitro Glass.

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QUESTION A-4

Reference the Letter of Notification, Paragraph 17. Please provide documentation that the anticipated impacts to the described wetlands are acceptable.

Response:

The work as described in Paragraph 17 of the Letter of Notification is covered under Waiver 3 of Title 25, Chapter 105 of the Pa. Code (see 25 Pa. Code § 105.12), as outlined in the attached email correspondence between representatives of FirstEnergy and the Department of Environmental Protection, Bureau of Waterways Engineering & Wetlands regarding the interpretation of such use of the Waiver. See Attachment to DR A-4.

Specifically, the single pole switch structures, the aerial stream, and wetland crossings that are not listed as wild or scenic nor located within a Federal Wilderness area, and the temporary access via temporary matting, are all covered under the Waiver 3 considerations.

Moreover, a NPDES application has been submitted, and MAIT will adhere to any conditions and by all E&S requirements associated with the project construction work.

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QUESTION A-5

Reference the Letter of Notification, Paragraph 22. Please provide a detailed explanation as to why the customer is not paying for the entirety of the proposed project. Additionally, please provide any relevant tariff references.

Response:

MAIT is a signatory to the PJM Open Access Transmission Tariff (“PJM OATT”)¹. Projects such as this one for new customer service fall under the Attachment M-3 process as a Supplemental Project (see PJM OATT, Attachment M-3)². It is MAIT’s business practice to assume cost responsibility for upgrades, new connection or installation of equipment along the networked path of its transmission system and located on the transmission side of the delivery point to the extent the facilities support the transmission network and are anticipated to benefit all customers connected to the network (“Network Costs”). For this Project, Network Costs include the modifications to the existing Geneva-Morgan Street 115 kV Transmission Line. MAIT will seek recovery of these Network Costs in Network Transmission Rates in accordance with its formula rate (see PJM OATT Attachment H-28).

The remaining project costs are considered non-network, and the line extension charges to the End Customer, Vitro Meadville Flat Glass, LLC, were determined in accordance with FE PA’s Electric Service Tariff, under the “Extension of Company Facilities: System Upgrades” provision (beginning at page 34). These components consist of the radial tap line and 115 kV switch extending from the proposed Structure #5A to the final dead-end structure outside the End Customer’s Vitro Glass Substation at POI #1 (i.e., the radial line extension); the “last span” from POI #1 into the End Customer’s substation (POI #2); and the integration of the End Customer’s protection and controls to the transmission system.

¹ MAIT does not have a separate, Pennsylvania-specific tariff that governs this Project.

² <https://agreements.pjm.com/oatt/31552> (last visited December 13, 2024).

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**JOINT LETTER OF NOTIFICATION :
FILING OF MID-ATLANTIC :
INTERSTATE TRANSMISSION, LLC :
AND FIRSTENERGY PENNSYLVANIA :
ELECTRIC COMPANY FOR THE :
GENEVA-MORGAN STREET 115 KV : Docket No. A-2024-3052306
GMO TRANSMISSION LINE TAP :
PROJECT IN GREENWOOD TOWNSHIP, :
CRAWFORD COUNTY, PENNSYLVANIA :
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VERIFICATION

I, Michael DeSarro, state that I am a Transmission Specialist for FirstEnergy Service Company; that I am authorized to make this Verification on behalf of Mid-Atlantic Interstate Transmission, LLC and FirstEnergy Pennsylvania Electric Company; and that the facts set forth are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: December 16, 2024



Michael DeSarro