

INDEX TO EXHIBITS

Docket Nos. A-2024-3051167, A-2024-3051213

P-2024-3051163,

Hearing Date: February 11, 2025

<u>LETTER</u>	<u>FOR IDENTIFICATION</u>	<u>IN EVIDENCE</u>
Hankins Exhibit A	59	--
Packet		
Collins Exhibit A	68	--
Letters		
Miller Exhibit A	73	--
Letter		
Krick Exhibit A	81	--
Maps		
Krick Exhibit B	83	--
Maps		
Krick Exhibit C	84	--
Article		

Testimony of Patti Hankins
229 St. Mary's Road
Pylesville, MD 21132
Patti.hankins@gmail.com

February 11, 2025 Public Input Hearing
PPL Chanceford to Doubs
PA PUC Docket A-2024-3051167

1. Purpose of PPL Chanceford to Doubs – PJM TEAC 10-3-23 Reliability needs due to data center growth
 - Dominion Zone – 5.5 GWs PJM 2023 Forecast Dominion Zone load growth 4.2 – 5% next 10-15 years from data centers
 - APS – MD Frederick County – 2 GWs for Quantum Frederick, 1st client Rowan Digital 300 MWs Fall 2025
2. Conflict Transource IEC 9A and Chanceford to Doubs
 - Transource 9A settlement, CPCN approved by MD PSC 6-3-2020 uses same ROW as Chanceford to Doubs
 - Transource 9A rejected by PA PUC and waiting decision from Third Circuit
 - PJM has 9A in suspended status with BOM expected to approve suspended status at next meeting, February 24-26, 2025
 - How can 2 projects utilize same ROW corridor?
3. PJM transmission only solutions are not sustainable
 - 2-4-25 TEAC presented 2030 increased load forecasts of 16 GWs primarily due to data center growth
 - PJM 1-2025 summer forecast for PPL – 10-year increase of 5.9%, 15-year increase of 4.1% and 20-year increase of 3.2%
 - On 2-5-25 PJM issued action to support critical grid reliability needs citing a potential of capacity shortages by 2026-2027 delivery year
 - Maryland and Virginia have laws restricting thermal, fossil fuel generation yet still need evermore electricity for data centers
 - PA landowners and ratepayers have increased burden because of MD & VA lack of responsibility
4. MPRP – Maryland Piedmont Reliability Project Update – connects to Chanceford to Doubs project in MD
 - MPRP connects to Chanceford to Doubs
 - MD PSC Case No. 9773 filed 12-31-2024 by PSEG
 - Petitions to intervene due 2-17-2025
 - MD Public Utilities Code § 7-207 (e) *“The Commission shall take final action on an application for a certificate of public convenience and necessity only after due consideration of:*
 - (1) *The recommendation of the governing body of each county or municipal corporation in which any portion of the construction of the generating station, overhead transmission line, or qualified generator leader line is proposed to be located;”*
 - As of noon, on 2-10-25 the following have petitioned to intervene:
 - a. Carroll County, MD
 - b. Frederick County, MD

- c. Baltimore County announced on 2-10-25 intent to intervene
- d. MD Delegate Nino Mangione, District 42A
- e. StopMPRP, Inc. announced intent to intervene – they represent 1,200+ landowners and the communities in 3 MD counties (Baltimore, Carroll and Frederick)
- f. The Sierra Club of MD announced their intent to intervene
- g. 25 landowners/businesses in the 3 counties have filed petitions to intervene
- h. 5 landowners/community planning councils have filed as interested persons

5. Fox45 Baltimore Town Hall on MPRP Project 1-2-2025

- YouTube: <https://www.youtube.com/watch?v=UK3CNLUKimo>
- MD PSC Chairman Hoover shares insights to CPCN Case No. 9773

Continuing to prop up Maryland and Virginia electricity needs shouldn't continue. Data center electricity use puts an undue burden on ratepayers. Data centers should have to shoulder more of the costs for their electricity needs. The PPL Chanceford to Doubs project does not benefit Pennsylvania landowners and electricity consumers. Please deny the CPCN for this project.

• **Purpose:**

- Address reliability needs in the Dominion and APS zones primarily 2GW's associated with Data Center Load forecasts (up to 7,500 MWs by 2027-28) *→ 5.5 GW's*
- Seeking robust and flexible solutions to address the reliability needs in those specific areas *→ First Energy area*

Quantum Leap 2GW's

• **Window Opened; February 24th 2023 / Closed May 31st 2023**

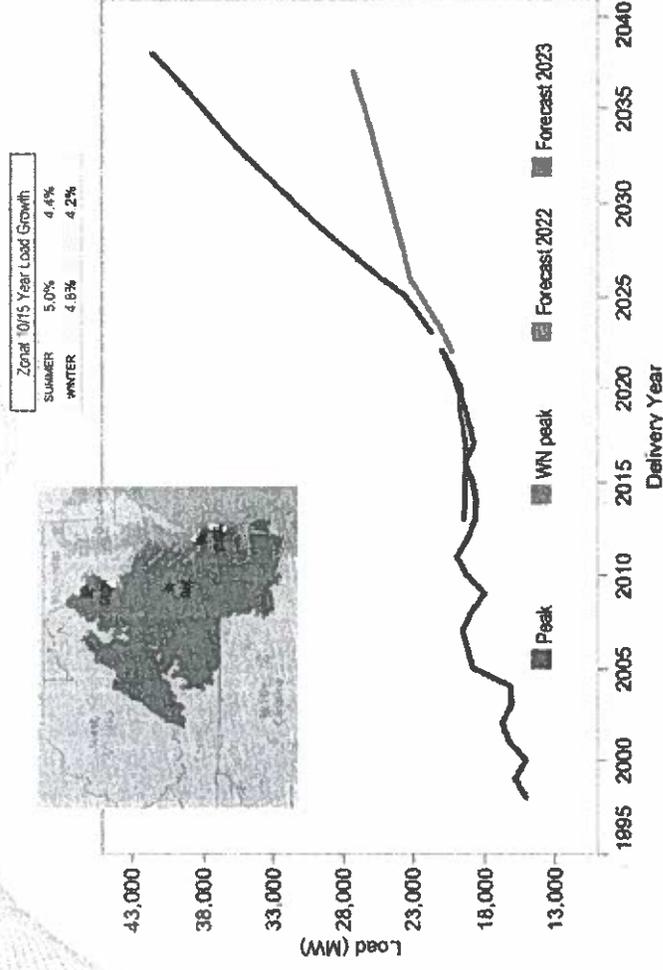
- PJM posted preliminary planning basecases on January 31st 2023
- 90 Day Window – Extended from April 25th to May 31st 2023



TEAC 10/3/2023

Load Forecast and Planning Approach

- PJM began receiving near and long term forecast input from Dominion, First Energy and NOVEC for Data Center load growth projections up to and including 2038 (15 year planning horizon).
- The PJM 2023 Forecast calls for approximately between 4.2% to 5.0% annual load growth in the Dominion area over the next 10-15 year timeframe.
- The Load Forecast information was refined and developed down to a bus/substation level for the 2028 and 2030 study years.
- PJM reassessed the transmission development needs in the area based on the refined forecast information and localized allocation of load.



<https://pjm.com/-/media/library/reports-notices/load-forecast/2022-load-forecast-report.ashx>

Need Number: APS-2023-029 (s3150.1, s3150.2)

Process Stage: Re-Present Solutions Meeting – 01/07/2025

Previously Presented: Solution Meeting – 02/06/2024

Need Meeting – 7/11/2023

Project Driver(s):
Customer Service

Specific Assumption Reference(s)

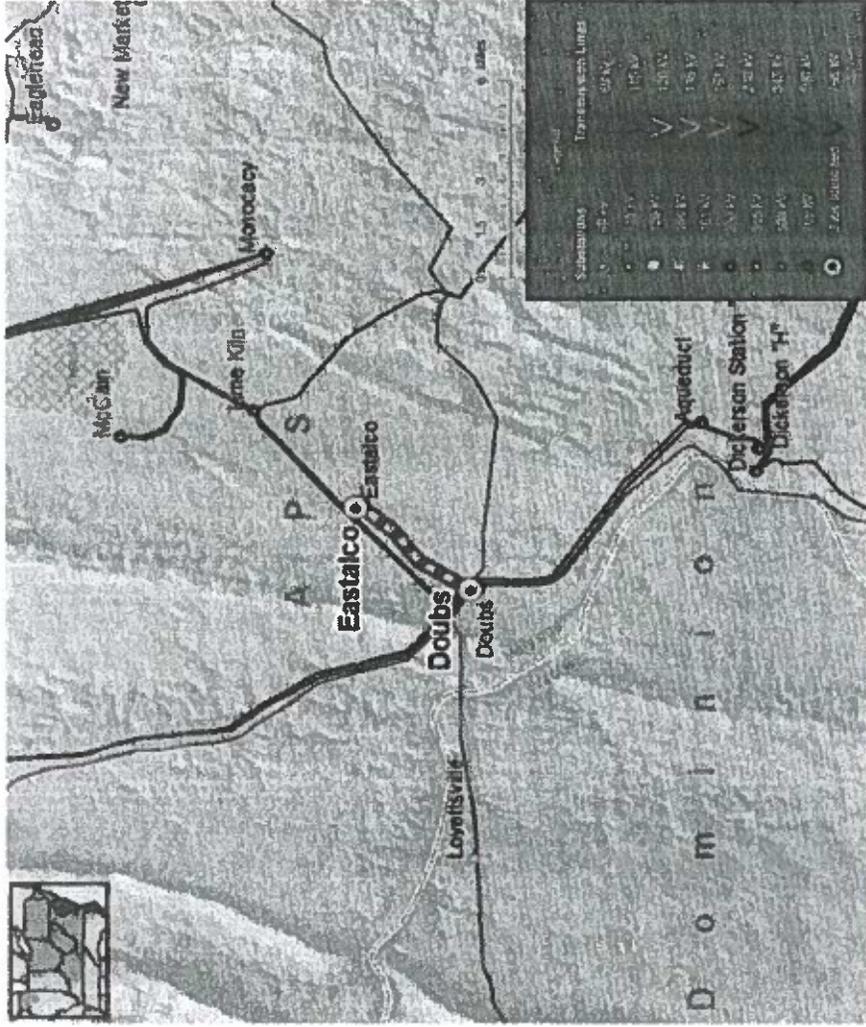
New customer connection request will be evaluated per FirstEnergy's "Requirements for Transmission Connected Facilities" document and "Transmission Planning Criteria" document.

*Fall '25 completion of
Review @ Quantum
Digital 300MW*

Problem Statement

New Customer Connection- A customer has requested 230 kV transmission service for approximately 300 MW of load near the Doubs-Sage #206 230 kV Line.

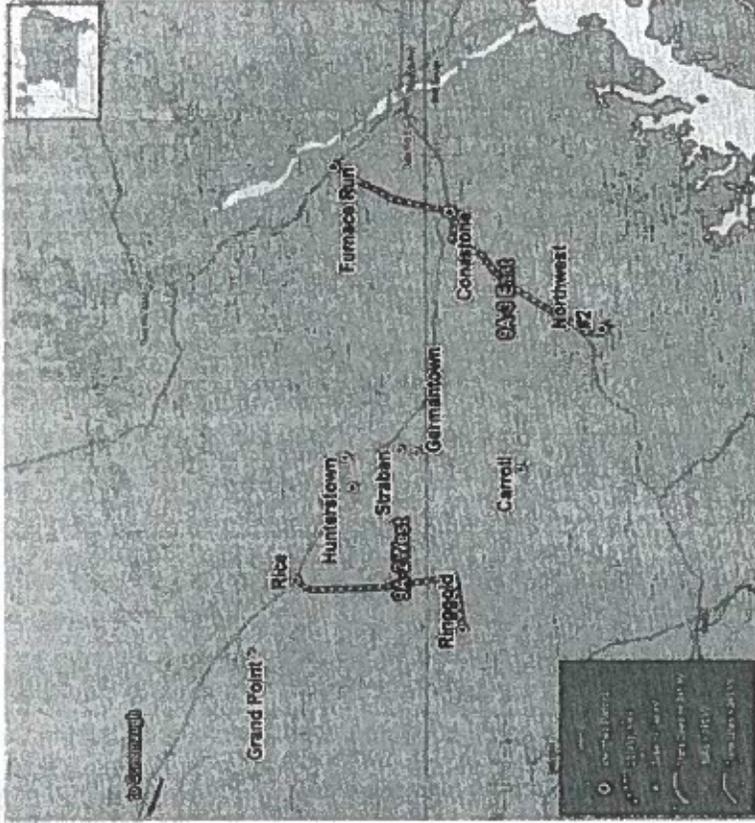
Requested In-Service Date: May 15, 2025





Project 9A (Without Capacitors)

- Tap the Conemaugh - Hunterstown 500 kV line and build new 230 kV double circuit line between Rice and Ringgold.
- Build new 230 kV double circuit line between Furnace Run and Conastone.
- Rebuild of the Conastone - Northwest 230 kV line.
- Replace the Ringgold #3 and #4 transformers with 230/138 kV auto transformers
- Ringgold bus reconfiguration
- Reconnector of Ringgold-Catoctin 138 kV.
- Cost (\$M)~ \$340.6
- IS Date: 2020
- Recommendation to be made at August PJM Board*.



*See Appendix A for cost allocation and designated entities

APL Chancelord - Doubts conflicts with PJM Project 9A - both use same transmission corridor. How can the PA PUC consider another project for the same corridor?

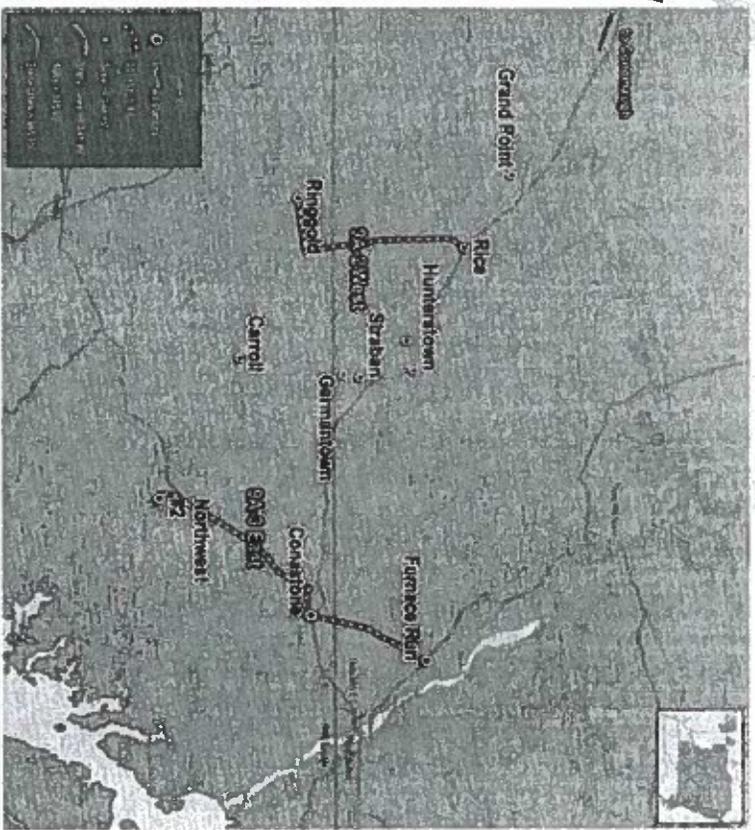
MDPSC Case No. 9471 CPCN approved
 Commission Order 89571-6/3/2020
 approved Transource settlement which moved IEC East to exstrie
 BGE transmission lines:
 ① Graceton to MD/PA border
 ② Conastone to a hr Crak @ MD/PA border



2

Project 9A (Without Capacitors)

- Tap the Conemaugh - Hunterstown 500 kV line and build new 230 kV double circuit line between Rice and Ringgold.
- Build new 230 kV double circuit line between Furnace Run and Conastone.
- Rebuild of the Conastone - Northwest 230 kV line.
- Replace the Ringgold #3 and #4 transformers with 230/138 kV autotransformers
- Ringgold bus reconfiguration
- Reconductor of Ringgold-Catoctin 138 kV.
- Cost (\$M)~ \$340.6
- IS Date: 2020
- Recommendation to be made at August PJM Board*.



*See Appendix A for cost allocation and designated entities

PJM TEAC 07/14/2016

APL Chancelord - Ducks conflicts with Psm Project 9A - both use same transmission corridor. How can the PA Pac consider another project for the same corridor?

*MDPSC Case No. 9471 COCN approved Commission Order 89571-6/3/2020 approved Transource settlement which moved IEC East to ex-his BGE transmission lines:
 ① Graceton to MD/PA border
 ② Conastone to 6th Crk @ MD/PA border*

- Transource IEC (9A) Project has been suspended since September 21, 2021 due to siting risks and therefore not included in the models pending any future developments in the regulatory process.
- PJM is required by Schedule 6 of the Operating Agreement (OA) to “annually review the cost and benefits” of Board-approved market efficiency projects that meet certain criteria to assure that a project continues to be cost beneficial.
- On Nov. 26, 2024, PJM filed with FERC a request for a waiver of the timing requirement associated with the 2024 Re-evaluation because the model was infeasible and additional time is needed to include RTEP projects that are expected to be approved in first quarter of 2025.
 - FERC did not issue an order by December 31, 2024 and therefore PJM completed the 2024 Re-evaluation Analysis using the only feasible market efficiency model presently available, which is the same model used in the 2023 Re-evaluation presented at the June 2024 TEAC.

- The results of the **2024 Re-evaluation Analysis** are the same as the results from the 2023 Re-evaluation Analysis because the model used in the 2023 Re-evaluation is the latest available feasible model despite known changed system conditions.
 - **B/C Ratio of 0.81** (B/C ratio = 1.09 when sunk costs are excluded).
 - Significant impacts may be presently and temporarily masked by reliability and other issues which are being addressed by RTEP projects that are expected to be approved in first quarter of 2025.

- PJM recommends retention of the Transource IEC (9A) Project in a suspended state in the RTEP for reasons including:
 - changed system conditions including substantially increased load forecasts and generation deactivations;
 - newly approved transmission system enhancements and not-yet-addressed needs identified in the planning process;
 - the uncertainty facing approved transmission projects due to ongoing regulatory proceedings that may impact the development and timing of a number of proposed PJM transmission projects;
 - Transource’s investment in the Project;
 - one state’s (Maryland) approval of the Project; and
 - a finding by a federal court that another state (Pennsylvania) violated the United States Constitution in denying approval of the Project.
- Updated Re-evaluation for 2025 will be performed after a feasible model is available that includes RTEP projects anticipated to be approved in 2025.

- 2025 RTEP Window 1 will utilize the 2025 PJM Load Forecast (Jan 2025);

<https://www.pjm.com/-/media/DotCom/Library/reports-notices/load-forecast/2025-load-report.pdf>

- 2030 Load Forecast to increase by 16 GWs approximately (compared to 2024 Load Forecast)
- PJM is currently working on finalizing the initial RTEP Baseline models
 - Planned for completion by end of February
- Resource balancing to serve forecasted load is expected be tight;
 - PJM will share more information related to Resource Assumptions and Sensitivity Scenarios (beyond baseline) in March 2025.



Energy Information Administration & Vendor Data

The Energy Information Administration (EIA) did not publish an Annual Energy Outlook (AEO) update in 2024 as they revamp models and make improvements to capture emerging technologies. Therefore, the 2023 update of Itron's end-use data provides the basis for appliance saturation rates, efficiency, and intensity and is consistent with the EIA's 2023 AEO. PJM obtained additional information from certain zones on Residential saturation rates based on their own load research. Details on zones providing information are presented in the supplement.

Consultant forecasts for behind the meter solar/battery and electric vehicles including light, medium & heavy duty were provided by S&P Global.

- The behind the meter solar/battery values were derived by PJM from a forecast obtained from SPGCI
- The electric vehicle values were derived by PJM from a forecast obtained from SPGCI

Load Adjustments

The forecasts of the following zones have been adjusted to account for large, unanticipated load changes, market adjustments, and peak shaving adjustments (see **Tables B-9 and B-9b** and the supplement for details available on the [PJM Website](#)):

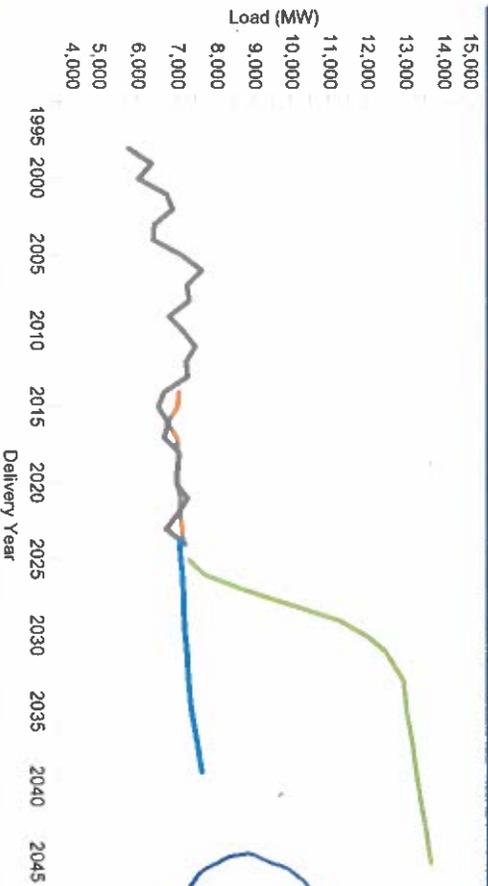
Zones	Adjusted to account for:
AEP	growth in data center load and a chip processing plant
APS, ATSI, BGE, DAYTON, PECCO, and PL	growth in data center load
COMED	growth in data center load and an electric vehicle battery plant
DEOK	adjusted to account for growth in a steel facility
DOM	growth in data center load and a voltage optimization program
PS	growth in data center load and port electrification
EKPC	a peak shaving program that commenced in the 2023 DY
ATSI and DOM	Non-Retail Behind-the-Meter Generation (NRBTMG) transitioning to participation as Demand Response in the Reliability Pricing Model

Compared to the 2024 Load Report, the 2025 PJM RTO summer peak forecast shows the following changes for three years of interest:

Next Year:		
Delivery	RPM Auction	RTEP Study
2025	2026	2030
+651 MW (0.4%)	+2,134 MW (1.4%)	+16,010MW (9.5%)

PPL Electric Utilities (PL)

Summer Peak



Weather - Annual Average 1993-2023

Avg Summer Daily Temp	72.4
Avg Summer Max Temp	94.2
Avg Winter Daily Temp	31.7
Avg Winter Min Temp	2.9

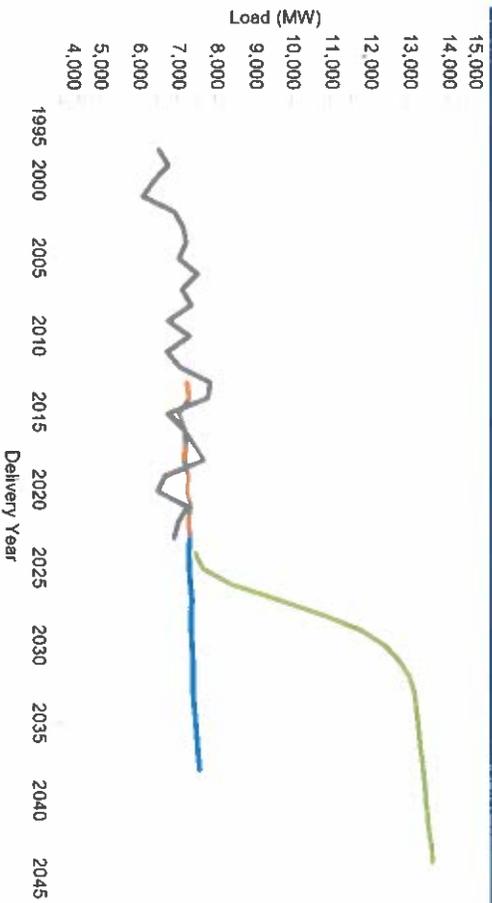


Zonal 10/15/20 Year Load Growth		
SUMMER	5.9%	4.1%
WINTER	5.8%	4.0%

LDAS

CENTRAL MID-ATLANTIC PJM MID-ATLANTIC PJM RTO
PLGRP WESTERN MID-ATLANTIC

Winter Peak



Metropolitan Statistical Areas and Weather Stations




JUSTIA[Go to Previous Versions of this Section](#) ▾

2024 Maryland Statutes

Public Utilities

Division I - Public Services and Utilities

Title 7 - Gas, Electric, and Water Companies

Subtitle 2 - Electric Generation Facility Planning

Section 7-207 - Generating Stations or Transmission Lines -- General Certification Procedure

Universal Citation:

MD Public Utilities Code § 7-207 (2024) ○

[◀ Previous](#)[Next ▶](#)

(a) (1) In this section the following words have the meanings indicated.

(2) "Brownfields site" means:

- (i) a former industrial or commercial site identified by federal or State laws or regulation as contaminated or polluted;
- (ii) a closed landfill regulated by the Department of the Environment; or
- (iii) mined land.

(3) (i) "Construction" means:

- 1. any physical change at a site, including fabrication, erection, installation, or demolition; or
- 2. the entry into a binding agreement or contractual obligation to purchase equipment exclusively for use in construction in the State or to undertake a program of actual construction in the State which cannot be canceled or modified without substantial loss to the owner or operator of the proposed generating station.

(ii) "Construction" does not include a change that is needed for the temporary use of a site or route for nonutility purposes or for use in securing geological data, including any boring that is necessary to ascertain foundation conditions.

(4) "Generating station" does not include:

- (i) a generating unit or facility that:
 - 1. is used for the production of electricity;

2. has the capacity to produce not more than 2 megawatts of alternating current; and

3. is installed with equipment that prevents the flow of electricity to the electric grid during time periods when the electric grid is out of service; or

(ii) a combination of two or more generating units or facilities that:

1. are used for the production of electricity from a solar photovoltaic system or an eligible customer-generator that is subject to the provisions of § 7-306 of this title;

2. are located on the same property or adjacent properties;

3. have the capacity to produce, when calculated cumulatively for all generating units or facilities on the property or adjacent property, more than 2 megawatts but not more than 14 megawatts of alternating current; and

4. for each individual generating unit or facility:

A. has the capacity to produce not more than 2 megawatts of alternating current;

B. is separately metered by the electric company; and

C. does not export electricity for sale on the wholesale market under an agreement with PJM Interconnection, LLC.

(5) (i) "Mined land" means the surface or subsurface of an area in which surface mining operations will be, are being, or have been conducted.

(ii) "Mined land" includes:

1. private ways and roads used for mining appurtenant to any surface mining area;

2. land excavations;

3. workings; and

4. overburden.

(6) "Qualified generator lead line" means an overhead transmission line that is designed to carry a voltage in excess of 69,000 volts and would allow an out-of-state Tier 1 or Tier 2 renewable source to interconnect with a portion of the electric system in Maryland that is owned by an electric company.

(b) (1) (i) Unless a certificate of public convenience and necessity for the construction is first obtained from the Commission, a person may not begin construction in the State of:

1. a generating station; or

2. a qualified generator lead line.

(ii) If a person obtains Commission approval for construction under § 7-207.1 of this subtitle, the Commission shall exempt a person from the requirement to obtain a certificate of public convenience and necessity under this section.

(iii) Notwithstanding subparagraph (i) of this paragraph, a person may not apply to obtain a certificate of public convenience and necessity for construction of a qualified generator lead line unless:

1. at least 90 days before the filing of an application for a certificate of public convenience and necessity, the person had in good faith offered the electric company that owns that portion of the electric grid in Maryland to which the qualified generator lead line would interconnect a full and fair opportunity for the electric company to construct the

qualified generator lead line; and

2. at any time at least 10 days before the filing of an application for a certificate of public convenience and necessity, the electric company:

A. did not accept from the person a proposal or a negotiated version of the proposal under which the electric company would construct the qualified generator lead line; or

B. stated in writing that the electric company did not intend to construct the qualified generator lead line.

(2) Unless a certificate of public convenience and necessity for the construction is first obtained from the Commission, and the Commission has found that the capacity is necessary to ensure a sufficient supply of electricity to customers in the State, a person may not exercise a right of condemnation in connection with the construction of a generating station.

(3) (i) Except as provided in paragraph (4) of this subsection, unless a certificate of public convenience and necessity for the construction is first obtained from the Commission, a person may not begin construction of an overhead transmission line that is designed to carry a voltage in excess of 69,000 volts or exercise a right of condemnation with the construction.

(ii) For construction related to an existing overhead transmission line, the Commission may waive the requirement in subparagraph (i) of this paragraph for good cause.

(iii) Notwithstanding subparagraph (i) of this paragraph and subject to subparagraph (iv) of this paragraph, the Commission may issue a certificate of public convenience and necessity for the construction of an overhead transmission line only if the applicant for the certificate of public convenience and necessity:

1. is an electric company; or

2. is or, on the start of commercial operation of the overhead transmission line, will be subject to regulation as a public utility by an officer or an agency of the United States.

(iv) The Commission may not issue a certificate of public convenience and necessity for the construction of an overhead transmission line in the electric distribution service territory of an electric company to an applicant other than an electric company if:

1. the overhead transmission line is to be located solely within the electric distribution service territory of that electric company; and

2. the cost of the overhead transmission line is to be paid solely by that electric company and its ratepayers.

(v) 1. This subparagraph applies to the construction of an overhead transmission line for which a certificate of public convenience and necessity is required under this section.

2. On issuance of a certificate of public convenience and necessity for the construction of an overhead transmission line, a person may acquire by condemnation, in accordance with Title 12 of the Real Property Article, any property or right necessary for the construction or maintenance of the transmission line.

(4) (i) Except as provided in subparagraph (ii) of this paragraph, for construction related to an existing overhead transmission line designed to carry a voltage in excess of 69,000 volts, the Commission shall waive the requirement to obtain a certificate of public convenience and necessity if the Commission finds that the construction does not:

1. require the person to obtain new real property or additional rights-of-way through eminent domain; or

2. require larger or higher structures to accommodate:

A. increased voltage; or

B. larger conductors.

(ii) 1. For construction related to an existing overhead transmission line, including repairs, that is necessary to avoid an imminent safety hazard or reliability risk, a person may undertake the necessary construction.

2. Within 30 days after construction is completed under subparagraph 1 of this subparagraph, a person shall file a report with the Commission describing the work that was completed.

(c) (1) On receipt of an application for a certificate of public convenience and necessity under this section, the Commission shall provide notice immediately or require the applicant to provide notice immediately of the application to:

(i) the Department of Planning;

(ii) the governing body, and if applicable the executive, of each county or municipal corporation in which any portion of the generating station, overhead transmission line, or qualified generator lead line is proposed to be constructed;

(iii) the governing body, and if applicable the executive, of each county or municipal corporation within 1 mile of the proposed location of the generating station, overhead transmission line, or qualified generator lead line;

(iv) each member of the General Assembly representing any part of a county in which any portion of the generating station, overhead transmission line, or qualified generator lead line is proposed to be constructed;

(v) each member of the General Assembly representing any part of each county within 1 mile of the proposed location of the generating station, overhead transmission line, or qualified generator lead line;

(vi) for a proposed overhead transmission line, each owner of land and each owner of adjacent land; and

(vii) all other interested persons.

(2) The Commission, when sending the notice required under paragraph (1) of this subsection, shall forward a copy of the application to:

(i) each appropriate State unit and unit of local government for review, evaluation, and comment regarding the significance of the proposal to State, area-wide, and local plans or programs; and

(ii) each member of the General Assembly included under paragraph (1)(iv) and (v) of this subsection who requests a copy of the application.

(3) On receipt of an application for a certificate of public convenience and necessity under this section, the Commission shall provide notice of the application on the Commission's social media platforms and website.

(d) (1) (i) The Commission shall provide an opportunity for public comment and hold a public hearing on the application for a certificate of public convenience and necessity in each county and municipal corporation in which any portion of the construction of a generating station, an overhead transmission line designed to carry a voltage in excess of 69,000 volts, or a qualified generator lead line is proposed to be located.

(ii) The Commission may hold the public hearing virtually rather than in person if the Commission provides a comparable opportunity for public comment and participation in the hearing.

(2) The Commission shall hold the public hearing jointly with the governing body of the county or municipal corporation in which any portion of the construction of the generating station, overhead transmission line, or qualified generator lead line is proposed to be located, unless the governing body declines to participate in the hearing.

(3) (i) Once in each of the 4 successive weeks immediately before the hearing date, the Commission shall provide weekly notice of the public hearing and an opportunity for public comment:

1. by advertisement in a newspaper of general circulation in the county or municipal corporation affected by the application;
2. on two types of social media; and
3. on the Commission's website.

(ii) Before a public hearing, the Commission shall coordinate with the governing body of the county or municipal corporation in which any portion of the construction of the generating station, overhead transmission line, or qualified generator lead line is proposed to be located to identify additional options for providing, in an efficient and cost-effective manner, notice of the public hearing through other types of media that are familiar to the residents of the county or municipal corporation.

(4) (i) On the day of a public hearing, an informational sign shall be posted prominently at or near each public entrance of the building in which the public hearing will be held.

(ii) The informational sign required under subparagraph (i) of this paragraph shall:

1. state the time, room number, and subject of the public hearing; and
2. be at least 17 by 22 inches in size.

(iii) If the public hearing is conducted virtually rather than in person, the Commission shall provide information on the hearing prominently on the Commission's website.

(5) (i) The Commission shall ensure presentation and recommendations from each interested State unit, and shall allow representatives of each State unit to sit during hearing of all parties.

(ii) The Commission shall allow each State unit 15 days after the conclusion of the hearing to modify the State unit's initial recommendations.

(c) The Commission shall take final action on an application for a certificate of public convenience and necessity only after due consideration of:

(1) the recommendation of the governing body of each county or municipal corporation in which any portion of the construction of the generating station, overhead transmission line, or qualified generator lead line is proposed to be located;

(2) the effect of the generating station, overhead transmission line, or qualified generator lead line on:

- (i) the stability and reliability of the electric system;
- (ii) economics;
- (iii) esthetics;
- (iv) historic sites;

(v) aviation safety as determined by the Maryland Aviation Administration and the administrator of the Federal Aviation Administration;

(vi) when applicable, air quality and water pollution; and

(vii) the availability of means for the required timely disposal of wastes produced by any generating station;

COMMISSIONERS

FREDERICK H. HOOVER, JR.
CHAIR

MICHAEL T. RICHARD
KUMAR P. BARVE
BONNIE A. SUCHMAN

STATE OF MARYLAND



PUBLIC SERVICE COMMISSION

January 10, 2025

PSEG Renewable Transmission LLC's *
Application for a Certificate of Public *
Convenience and Necessity to Construct a *
New 500 kV Transmission Line in Portions *
of Baltimore, Carroll and Frederick Counties *
* * * * *

Case No. 9773

As of noon on 2/10/25
Motions to Intervene:
Carroll County, MD
Frederick County, MD
MD Delegate Nino Mangione,
District 42A
Baltimore County announces
intent to Intervene
Stop MPRP, Inc attorney
announced intent
to Intervene
The Sierra Club of MD
25 Landowners/Businesses
Filed to Intervene
5 Interested parties
filed

**NOTICE OF INTERVENTION DEADLINE AND
REQUESTED COMPLETENESS DETERMINATION**

On December 31, 2024, PSEG Renewable Transmission LLC (“PSEG Renewable Transmission” or “Applicant”) filed an application for a Certificate of Public Convenience and Necessity (“CPCN”) for authority to construct the Maryland Piedmont Reliability Project (“MPRP” or “the Maryland Piedmont Reliability Project”).¹ As proposed, the MPRP is an approximately 67-mile, 500 kV alternating current (“AC”) single circuit overhead transmission line that traverses portions of Baltimore, Carroll and Frederick Counties, in Maryland.

Petitions to intervene in the matter must be filed with the Commission's Executive Secretary, Andrew S. Johnston, William Donald Schaefer Tower, 6 St. Paul Street, 16th Floor, Baltimore, Maryland 21202, by Monday, February 17, 2025, and must reference “Case No. 9773”.² Interventions are governed by *Annotated Code of Maryland*, Public Utilities Article

¹ Maillog No. 314555.

² Petitions to intervene may be mailed or e-filed. Details of the e-File system can be found on the Commission's website. www.psc.state.md.us.

WILLIAM DONALD SCHAEFER TOWER 6 ST. PAUL STREET BALTIMORE, MARYLAND 21202-6806

410-767-8000

Toll Free: 1-800-492-0474

FAX: 410-333-6495

MDRS: 1-800-735-2258 (TTY/Voice)

Website: www.psc.state.md.us

(“PUA”) § 3-106. Information regarding the CPCN process and intervention can be viewed on the Commission’s website at:

- <https://www.psc.state.md.us/electricity/cpcn-information/>

The Applicant is directed to cause a display advertisement to be published in a newspaper in general circulation within Baltimore, Carroll, and Frederick Counties at least twice, in successive weeks, prior to **February 10, 2025**, to also advise persons who seek to intervene in this proceeding that petitions to intervene shall be filed with the Commission's Executive Secretary by close of business on **February 17, 2025**.

Additionally, the Applicant is encouraged to use any social media or other communication methods to advise residents/businesses of Baltimore, Carroll, and Frederick Counties of the date by which petitions to intervene must be submitted. The Applicant is directed to file a certificate of publication and postings with the Commission on or before the date of the intervention deadline. Further, if the Applicant has not done so at the time of the filing of its application with the Commission, the Applicant is directed to comply with all notice and service of copy requirements established under COMAR and the PUA, and file a certificate of compliance with the notice and service of copy requirements on or before **February 10, 2025**.

Additionally, the Commission hereby requests that the Maryland Department of Natural Resources, Power Plant Research Program (“PPRP”) report by **March 26, 2025** as to whether PPRP considers the application to be administratively complete in accordance with COMAR 20.79.01.06.

Case No. 9773
Notice of Intervention Deadline and
Requested Completeness Determination
January 10, 2025
Page 3 of 3

Upon receipt of the completeness recommendation, the Commission will further consider the procedural schedule in this matter.

By Direction of the Commission,

/s/ Andrew S. Johnston

Andrew S. Johnston
Executive Secretary

February 6, 2025

Via Electronic Filing
Mr. Andrew Johnston
Executive Secretary
Maryland Public Service Commission
6 St. Paul Street, 16th Floor
Baltimore, Maryland 21202

Re: Entry of Appearance – PSEG Renewable Transmission, LLC’s
Application for a Certificate of Public Convenience and Necessity
Case No. 9773

Dear Mr. Johnston:

Please enter the appearance of Timothy F. Maloney, Esq.
(tmaloney@jgllaw.com), Alyse L. Prawde (aprawde@jgllaw.com), and the law
firm of Joseph, Greenwald & Laake, P.A. as co-counsel for Carroll County,
Maryland in the above referenced case.

Very truly yours,

JOSEPH, GREENWALD & LAAKE, P.A.



By: Timothy F. Maloney

TFM/mh

Timothy C. Burke
County Attorney
tburke@carrollcountymd.gov
410-386-2030, 1-888-302-8978
FAX 410-840-8931
MD Relay Service 7-1-1/800-735-2258



Department of the County Attorney
Carroll County Government
225 North Center Street
Westminster, Maryland 21157

February 3, 2025

VIA ELECTRONIC FILING

Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul Street, 16th Floor
Baltimore, Maryland 21202

RE: Case No. 9773- PSEG Renewable Transmission, LLC's application for a Certificate of Public Convenience and Necessity to construct a 500 kV Transmission Line in Portions of Baltimore, Carroll, and Frederick Counties in Maryland

Dear Sir or Madam:

Enclosed for filing in the above referenced matter is the Petition to Intervene and Notice of Appearance of Carroll County, Maryland regarding the above-referenced proceeding. In accordance with the Commission's July 12, 2021 Notice of Continued Waiver of Paper Filing Requirements, Carroll County is not providing paper copies of this filing. Please feel free to contact me if you have any questions regarding this matter.

Respectfully Submitted,



Timothy C. Burke
County Attorney

cc: Case No. 9773 Service List (via email)

BEFORE THE PUBLIC SERVICE COMMISSION OF MARYLAND

PSEG RENEWABLE TRANSMISSION, LCC's *
APPLICATION FOR A CERTIFICATE OF *
PUBLIC CONVENIENCE AND NECESSITY * Case No. 9773
TO CONSTRUCT A NEW 500 kV *
TRANSMISSION LINE IN PORTIONS OF *
BALTIMORE, CARROLL, AND FREDERICK, *
MARYLAND COUNTIES *

PETITION TO INTERVENE AND NOTICE OF APPEARANCE OF
THE COUNTY COMMISSIONERS OF CARROLL COUNTY, MARYLAND

Pursuant to the Public Service Commission's Notice of Intervention Deadline and Requested Completeness Determination, issued on January 10, 2025, the County Commissioners of Carroll County, Maryland ("the County") hereby files this petition to intervene as a party in the above-captioned proceeding. In support of its petition, the County states as follows:

1. This proceeding involves the December 31, 2024 application, filed by PSEG Renewable Transmission, LLC, for a Certificate of Public Convenience and Necessity to construct a 500 kV Transmission Line traversing large portions of Carroll County, Maryland.
2. As the governing body, the County has a unique and substantial interest in this matter. No other party can adequately represent the County's interests.
3. The County requests that the following individual be included on the service list in this proceeding, to receive service of all orders, pleadings, and other documents:

Timothy C. Burke, Carroll County Attorney
225 North Center Street, Suite 300
Westminster, Maryland 21157
410-386-2032
tburke@carrollcountymd.gov

WHEREFORE, the County respectfully requests that its petition to intervene as a party in the above-captioned case be Granted.

THE COUNTY COMMISSIONERS OF CARROLL COUNTY
BY: Timothy C. Burke, County Attorney

NOTICE OF APPEARANCE

Please enter the appearance of the following attorney in the above-referenced case on behalf of Carroll County, Maryland:

Timothy C. Burke
tburke@carrollcountymd.gov

Respectfully Submitted,



Timothy C. Burke
Carroll County Attorney
225 North Center Street, Suite 300
Westminster, Maryland 21157
410-386-2032
tburke@carrollcountymd.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of February 2025, a copy of this Petition to Intervene and Notice of Appearance of Carroll County, Maryland was sent via email to the parties on the Service List in this proceeding.



Timothy C. Burke
County Attorney



FREDERICK COUNTY GOVERNMENT

Jessica Fitzwater
County Executive

OFFICE OF THE COUNTY ATTORNEY

Bryon C. Black, County Attorney
Jennifer M. Keefer, Deputy County Attorney
Kathy L. Mitchell, Senior Assistant County Attorney
Andrew J. Ford, Senior Assistant County Attorney

Joshua S. Brewster, Senior Assistant County Attorney
Kendall A. Desaulniers, Senior Assistant County Attorney
Catherine S. Keller, Senior Assistant County Attorney
Thomas P. Sinton, Assistant County Attorney

February 6, 2025

Andrew S. Johnston, Executive Secretary
Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul Street, 16th Floor
Baltimore, MD 21202

Re: PSC Case No. 9773 - In the Matter of the Application of PSEG Renewable Transmission LLC for a Certificate of Public Convenience and Necessity to Construct a New 500 kV Transmission Line in Portions of Baltimore, Carroll and Frederick Counties

Dear Mr. Johnston:

Attached for filing in the above referenced proceeding a Petition to Intervene prepared on behalf of Frederick County, Maryland.

Thank you for your assistance.

Sincerely,

Bryon C. Black, County Attorney
Client Protection Fund No. 9112170068
Bblack@frederickcountymd.gov
Joshua S. Brewster, Senior Asst. Co. Attorney
Client Protection Fund No. 1306240002
JBrewster@frederickcountymd.gov
Wendy S. Kearney, Counsel for Frederick County
Client Protection Fund No. 8512010316
WKearney.law@gmail.com
Attorneys for Frederick County, Maryland

**BEFORE THE
PUBLIC SERVICE COMMISSION OF MARYLAND**

IN THE MATTER OF THE APPLICATION *
OF PSEG RENEWABLE TRANSMISSION, LLC *
FOR A CERTIFICATE OF PUBLIC *
CONVENIENCE AND NECESSITY TO CASE NO. 9773
CONSTRUCT A NEW 500 kV TRANSMISSION *
LINE IN PORTIONS OF BALTIMORE, *
CARROLL, AND FREDERICK COUNTES *

* * * * *

**PETITION TO INTERVENE
FILED BY FREDERICK COUNTY, MARYLAND**

Frederick County, Maryland, a body corporate and politic of the State of Maryland ("Frederick County") by its undersigned attorneys files this Petition, pursuant to *Annotated Code of Maryland*, Public Utilities Article, §3-106, to intervene and become a party in the above-captioned matter.

The application filed by PSEG Renewable Transmission LLC, seeks a Certificate of Public Convenience and Necessity (CPCN) to construct the Maryland Piedmont Reliability Project, an approximately 67-mile, 500 kV alternating current single circuit overhead transmission line that traverses portions of Baltimore, Carroll, and Frederick Counties.

As the governing body, Frederick County, Maryland, has unique interests in this application as the proposed project, if granted a CPCN, will affect the health, safety, and welfare of the citizens of Frederick County, and Frederick County's interests will not be adequately represented by any other party to these proceedings.

Frederick County Petitions to Intervene for the purpose of representing Frederick County's interests during the proceedings on this application.

CONCLUSION

Frederick County, Maryland, respectfully requests its Petition to Intervene be granted. Approving the County's Petition to Intervene will best enable the Commission to give due consideration to the recommendation of Frederick County's governing body.

Respectfully submitted,



Bryon C. Black, County Attorney
Client Protection Fund No. 9112170068
Bblack@frederickcountymd.gov
Joshua S. Brewster, Senior Asst. County Attorney
Client Protection Fund No. 1306240002
JBrewster@frederickcountymd.gov
Wendy S. Kearney, Counsel for Frederick County
Client Protection Fund No. 8512010316
wkearney.law@gmail.com

Office of the County Attorney
12 East Church Street, Winchester Hall
Frederick, MD 21701
O: (301) 600-2913
F: (301) 600-1161
Attorneys for Frederick County, Maryland

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of February 2025, a copy of the foregoing Petition to Intervene filed by Frederick County, Maryland was sent via electronic service to all members of the Service List in Case No. 9773 dated February 6, 2025.



Bryon C. Black, County Attorney

Petition to Intervene in Maryland PSC Case 9773

Delegate Nino Mangione

Low House of Delegates 6 Bladen St. Room

Annapolis, MD 21401

Phone: 410-841-3258

Email: nino.mangione@house.state.md.us

Date: January 29, 2025

To:

Andrew S. Johnston
Executive Secretary
Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul Street, 16th Floor
Baltimore, MD 21202

Subject: Petition to Intervene in Maryland PSC Case No. 9773

Dear Mr. Johnston,

I, Del. Nino Mangione respectfully petition to intervene in the above-referenced proceeding pursuant to Maryland Public Utilities Code §3-106 and the Maryland Public Service Commission's (PSC) rules.

Given the substantial and adverse impacts of the proposed project on my

Legislative District, District 42A

no other party to the proceeding can adequately represent my interests.

Interest in the Case

I am the elected representative for District 42A to the Maryland House of Delegates. Much of District 42A is impacted by Maryland PSC Case No. 9773.

As the elected representative to the Maryland House of Delegates I feel I can offer relevant testimony in this case as to the opposition, impact, and impact if the PSC approves the application in case 9773.

I have been directly involved with numerous citizens who have communicated their concerns and have personally witnessed the potential impact of this project.

I feel I have relevant information for the PSC in case No. 9773.

Grounds for Intervention

1. The proposed project would have a significant impact on

The citizens residing in Maryland Legislative District 42A which I am elected to represent.

2. My unique circumstances provide valuable insights for the Commission's evaluation of the potential impacts of the project.
3. Participation in this case allows me to ensure that my concerns and those of my community are addressed.

I reserve the right to be represented by counsel during these proceedings.

Request for Relief

For the reasons stated, I respectfully request that the Commission GRANT my Petition to Intervene.

Certification

I certify that this Petition to Intervene has been served on all parties of record in Case No. 9773 via the Maryland PSC E-file system, as required by Commission regulations.

Thank you for considering this Petition. Please contact me at the information provided below if further details are required.

Respectfully submitted,

Delegate Nino Mangione

Low House of Delegates 6 Bladen St. Room 320

Annapolis, MD 21401

Phone: 410-841-3258

Email: nino.mangione@house.state.md.us

COUNTY EXECUTIVE KLAUSMEIER ANNOUNCES BALTIMORE COUNTY INTERVENTION IN TRANSMISSION LINE PROJECT

February 10, 2025

TOWSON – County Executive Kathy Klausmeier today announced that Baltimore County will petition to intervene in the Maryland Public Service Commission’s consideration of PSEG Renewable Transmission’s application for authority to construct the Maryland Piedmont Reliability Project.

“Protecting the best interests of our residents and agricultural community while maintaining the County’s conservation easements and preserved land are our top priorities,” said Baltimore County Executive Kat Klausmeier. *“While Baltimore County does not have the legal authority to stop the project, we will continue to work with our state and Council partners to share serious concerns about its impacts and protect our County’s agricultural legacy and land preservation interests.”*

Baltimore County’s concerns about this proposed project have been well documented over several months. This intervention announcement follows:

- County Executive Klausmeier’s January 22, 2025 letter to the Public Service Enterprise Group (PSEG) requesting the group perform an analysis to identify potential impacts to
- County-owned easements. On January 31, PSEG responded with a summary of the group’s findings, which indicated a significant impact on easements – including those issued under the Baltimore County Agricultural Land Preservation Program – as well as forest buffer and conservation easements.
- Baltimore County Council’s unanimous passage of Resolution 45-24 on October 21, 2024 opposing the MPRP and encouraging the Maryland Public Service Commission to reject the project.

- Former Baltimore County Executive Johnny Olszewski and the Board of Carroll County Commissioners' September 30, 2024 letter to Governor Moore requesting collaborative support to address and amplify unanswered questions about MPRP.

Then Maryland State Senator Kathy Klausmeier's – along with 17 additional state legislators – August 27, 2024 letter to regional transmission organization PJM expressing concerns about the project and offering alternative approaches.

Former Baltimore County Executive Olszewski's July 31, 2024 letter to PSEG expressing serious concerns about the project, opposing the use of eminent domain and requesting a comprehensive justification regarding the necessity for the transmission line project.

"There are still far too many questions about the Maryland Piedmont Reliability Project's potential environmental impacts – as well as impacts on Baltimore County residents and farmers – to move forward," said County Council Chairman Mike Ertel. *"The Council took a stand this past October with our unanimous passage of Resolution 45-24, and fully support Baltimore County's intervention in this matter."*

"I fully support County Executive Klausmeier and Baltimore County Government's decision to file as an intervener before the Public Service Commission regarding the proposed MPRP power-line project," said Baltimore County Councilman Wade Kach. *"This project threatens to cut across northern Baltimore County, threatening our agricultural industry, and the property rights of many County residents. It also undermines the County's preservation efforts, which have successfully protected over 70,000 acres of prime and productive land. The proposed route, dangerously close to the Prettyboy Reservoir, poses a significant concern to our environment and water quality. We must stand firm in protecting these vital resources for both current and future generations."*

PSEG filed an application for a Certificate of Public Convenience and Necessity – case number 9773 –with the Maryland Public Service Commission on December 31, 2024. While Baltimore County Government has no legal authority in the approval or disapproval of this project, all efforts from residents and stakeholders to amplify concerns about the project are encouraged.



Feedback

FOR INFORMATION



7315 Wisconsin Avenue, Bethesda Maryland 20814 | 202-297-6100
Carolyn@carolynelefant.com | LawOfficesofCarolynElefant.com | licensed in MD, DC, NY

January 29, 2025

Andrew S. Johnston
Executive Secretary
Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul Street, 18th Floor
Baltimore, Maryland 21202

**Re: PSEG Maryland Piedmont Reliability Project, Case No. 9773
Stop MPRP Request for Clarification or Waiver of Counsel
Representation Rule, COMAR 20.07.01.04**

Dear Secretary Johnston,

My law firm represents Stop MPRP, Inc., an organization formed to protect and preserve the natural beauty and private lands in Maryland. Stop MPRP intends to intervene in the above-captioned proceeding but at this juncture, seeks guidance for its members and the broader public on the necessity of representation by counsel for farms, businesses, and other property owners organized as limited liability companies (LLC's) to intervene.

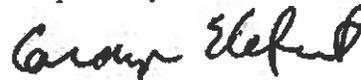
By way of background, many farms, small businesses and property owners in, or in close proximity to the proposed MPRP route are organized as LLCs – primarily single-member or closely family-held LLCs. Typically, these LLCs were formed to shield individual owners from personal exposure for business liabilities, but otherwise, these LLCs are effectively indistinguishable from the individual owners.

COMAR 20.07.01.04(A) requires that all parties, except individuals appearing on their own behalf, be represented by attorneys admitted to practice before the Maryland Court of Appeals. Although the regulation permits individuals to represent themselves, it does not explicitly address scenarios where the LLC and individual owners are essentially one and the same. Traditionally,

the rationale for requiring attorney representation in business entities stems from the need to protect the interests of multiple stakeholders. In single-member or closely-held family LLCs, this concern is not present as there are no other stakeholders whose interests require protection.

Clarification or alternatively, waiver of COMAR 20.07.01.04 is necessary to relieve such LLCs of the significant financial burden of retaining counsel to intervene in a CPCN proceeding for a project that these owners did not ask for and that would substantially negatively affect their properties in significant respects. In fact, many of these individual LLC owners simply cannot afford to hire an attorney – so unless they are permitted to proceed *pro se*, they will effectively be deprived of their due process rights to protect their businesses and properties. Accordingly, guidance is requested as soon as possible to allow sufficient time for these LLCs to intervene by the February 17, 2025 deadline. Respectfully, we would request a response by no later than Monday, February 3rd.

Respectfully submitted,



Carolyn Elefant
Counsel for MPRP

cc: Service List

MARYLAND PUBLIC SERVICE COMMISSION

**PSEG Renewable Transmission LLC's
Application for a Certificate of Public
Convenience and Necessity to Construct a
New 500 kV Transmission Line in Portions
of Baltimore, Carroll and Frederick
Counties**

Case No. 9773

**MOTION FOR SPECIAL ADMISSION OF NONRESIDENT ATTORNEY IN
MARYLAND PUBLIC SERVICE COMMISSION CASE NO. 9773**

Sierra Club respectfully requests that the Maryland Public Service Commission admit Jill E. Grant to appear on behalf of Sierra Club in Maryland Public Service Commission Case No. 9773 ("PSEG Renewable Transmission LLC's Application for a Certificate of Public Convenience and Necessity to Construct a New 500 kV Transmission Line in Portions of Baltimore, Carroll, and Frederick Counties"), pursuant to the Code of Maryland Regulations ("COMAR") § 20.07.01.04. Sierra Club of Maryland plans to petition to intervene in this proceeding and such petition will be filed if this Motion for Special Admission is granted.

In support of this Motion for Special Admission of a Nonresident Attorney, movant represents that:

1. COMAR § 20.07.01.04(B) provides:

A nonresident attorney may not be allowed to enter his appearance in a case before the [Public Service] Commission except upon motion, which will not ordinarily be granted unless some attorney with a full-time office in this State is associated with him or her in the matter.

2. Jill E. Grant is a member in good standing of the District of Columbia Bar and New Mexico State Bar, and is the founding and principal member of Jill Grant & Associates, LLC.

Ms. Grant's contact information is as follows:

Jill Grant & Associates, LLC
1319 F St NW
Suite 300
Washington, DC 20004
Tel: (202) 821-1950
jgrant@jillgrantlaw.com

2. Attorney Sari Amiel of the Sierra Club, which has a full-time office in this state, is a Maryland-barred attorney and will be associated with Jill Grant by reviewing documents prior to their being filed with this Commission and by being available by phone during any proceedings in this case where Jill E. Grant is required to appear.

Wherefore, for the reasons stated above, Sierra Club respectfully requests that the Maryland Public Service Commission enter an order admitting Ms. Grant to represent Sierra Club in Maryland Public Service Commission Case No. 9773 pursuant to COMAR 20.07.01.04(B).

Respectfully Submitted,

/s/ Sari Amiel
Sari Amiel (MD Bar # 2407151002)
Sierra Club
50 F St. NW, Eighth Floor
Washington, DC 20001
(202) 675-6275
sari.amiel@sierraclub.org

Jill E. Grant (DCB #358306)
JILL GRANT & ASSOCIATES, LLC
1319 F Street, NW
Washington, D.C. 20004
Telephone: (202) 821-1950
Facsimile: (202) 459-9558
jgrant@jillgrantlaw.com

Dated: February 6, 2025

<https://foxbaltimore.com/news/local/elected-leaders-and-energy-experts-discuss-the-mprp-transmission-line-on-a-fox45-town-hall>

Elected leaders and energy experts discuss the MPRP transmission line on a FOX45 Town Hall

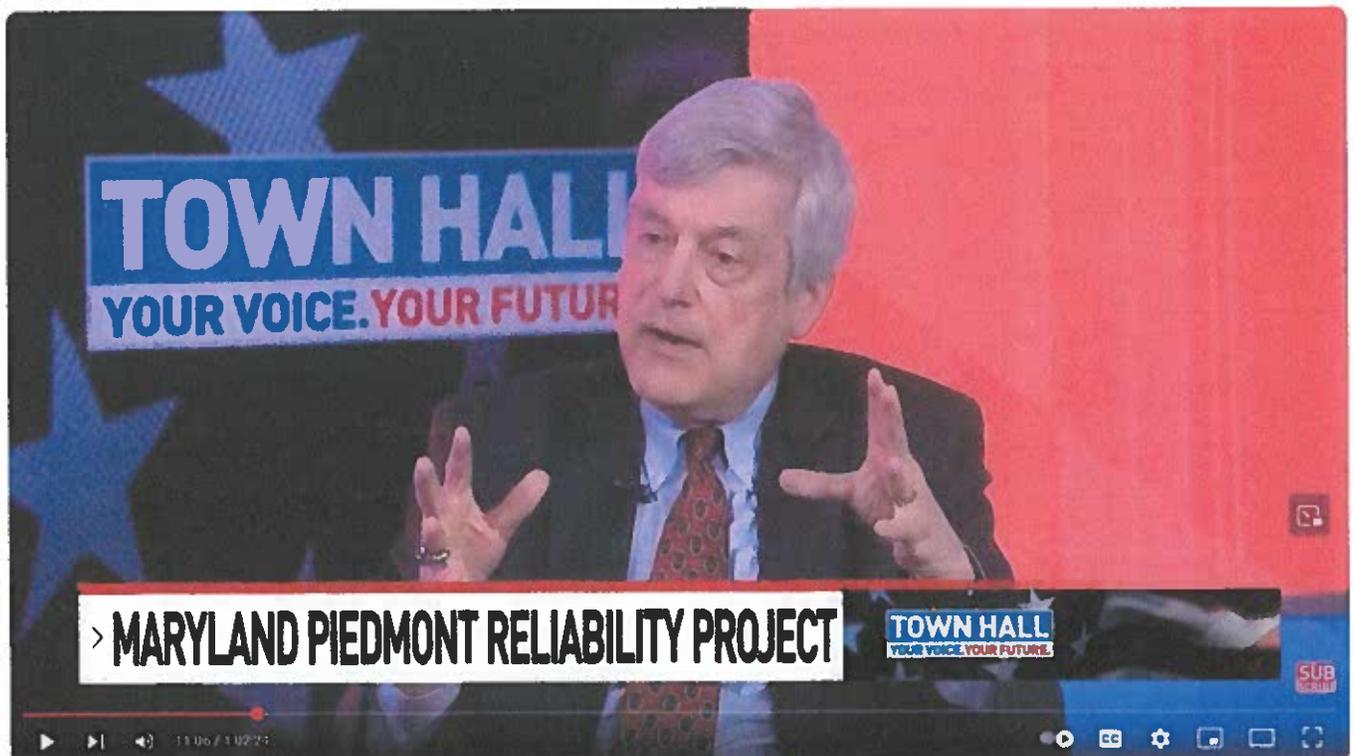
by DANNY TOW & ELLIE BUCKHEIT | FOX45 NEWS | Thu, January 2nd 2025 at 10:03 PM
Updated Thu, January 2nd 2025 at 10:55 PM

(WBFF) — In a Town Hall discussion on the controversial Maryland Piedmont Reliability Project (MPRP), lawmakers, energy experts, and policy makers spoke about the various issues posed by the proposed transmission line as well as Maryland's energy-generating capabilities.

The MPRP's need and development was central to the hour-long discussion hosted by FOX45's Mikenzie Frost. Frederick Hoover, chair of Maryland's Public Service Commission (PSC), said that while he couldn't comment on specifics of their proposals, groups behind the project still need to convince members of the PSC, himself, and the general public of its necessity.

"While the company is contending that this project is needed for that, they have the burden of proof to convince the Public Service Commission that that's true," he said. "I can't really comment on the validity of their arguments."

<https://www.youtube.com/watch?v=UK3CNLUKimo>



Town Hall on the PSEG Transmission Line, hosted by Mikenzie Frost

The MPRP - proposed as a solution to a burgeoning energy crisis, according to PSEG, the company behind it - has drawn criticism from [residents](#) and [lawmakers alike](#) for allegedly not providing power to Maryland despite being built through the state as well as failing to consider routes that use primarily undeveloped land, as opposed to the currently proposed route that builds a sizable portion of the transmission line on occupied land.

To that point, State Sen. Chris West echoed a common concern of the majority of panelists, arguing that the "project provides absolutely no benefit to the state of Maryland."

"It is a long extension cord that goes from the Pennsylvania line down to Point of Rocks," Sen. West said. "What there is is a transmission line there that takes it directly to Loudoun County, Virginia. Every single electron coming through this proposed line is going down to Virginia. It's not going to be used in Maryland."

West said he plans to introduce legislation during the upcoming General Assembly to get a better understanding of Maryland's energy problem.

"Maryland needs a single energy policy with everyone on the same page," he said, as contrasted with what he currently sees as a multitude of ideas across the aisle. West pushed for "a top-level task force for 2025" studying Maryland's current energy situation and projections for years down the road if different plans are followed.

Senate Minority Leader Steve Hershey was more pointed with his ideas and laid blame to Democrats in Annapolis who control both chambers of the General Assembly.

"There's a capacity and generation issue, and this is a bad position we're in because of Democrat policies," he said.

Hershey also claimed Maryland imports 40% of its energy from other states, and thus is "reliant on other states to be able to provide us enough generation, but in order to do so, that has to come through transmission lines."

Governor Wes Moore's name was invoked multiple times throughout the discussion. From a disclaimer that the governor declined an invitation to participate to criticisms of his handling of the MPRP proposal, Moore's leadership was brought into question.

"He's completely absent, and without that leadership, we're going to have a hard time getting a good plan together to tackle these bigger, long-term issues in the future," State Del. Ryan Nawrocki said.

While several of the Town Hall's guests focused on the big picture, Mark Aitken, Senior Vice President of Advanced Technology for Sinclair Broadcast Group, said the time is now to look at the future of energy needs in Maryland.

"Our energy demands are now, we need to take advantage of what we have now, but we also need to plan for the future," he said.

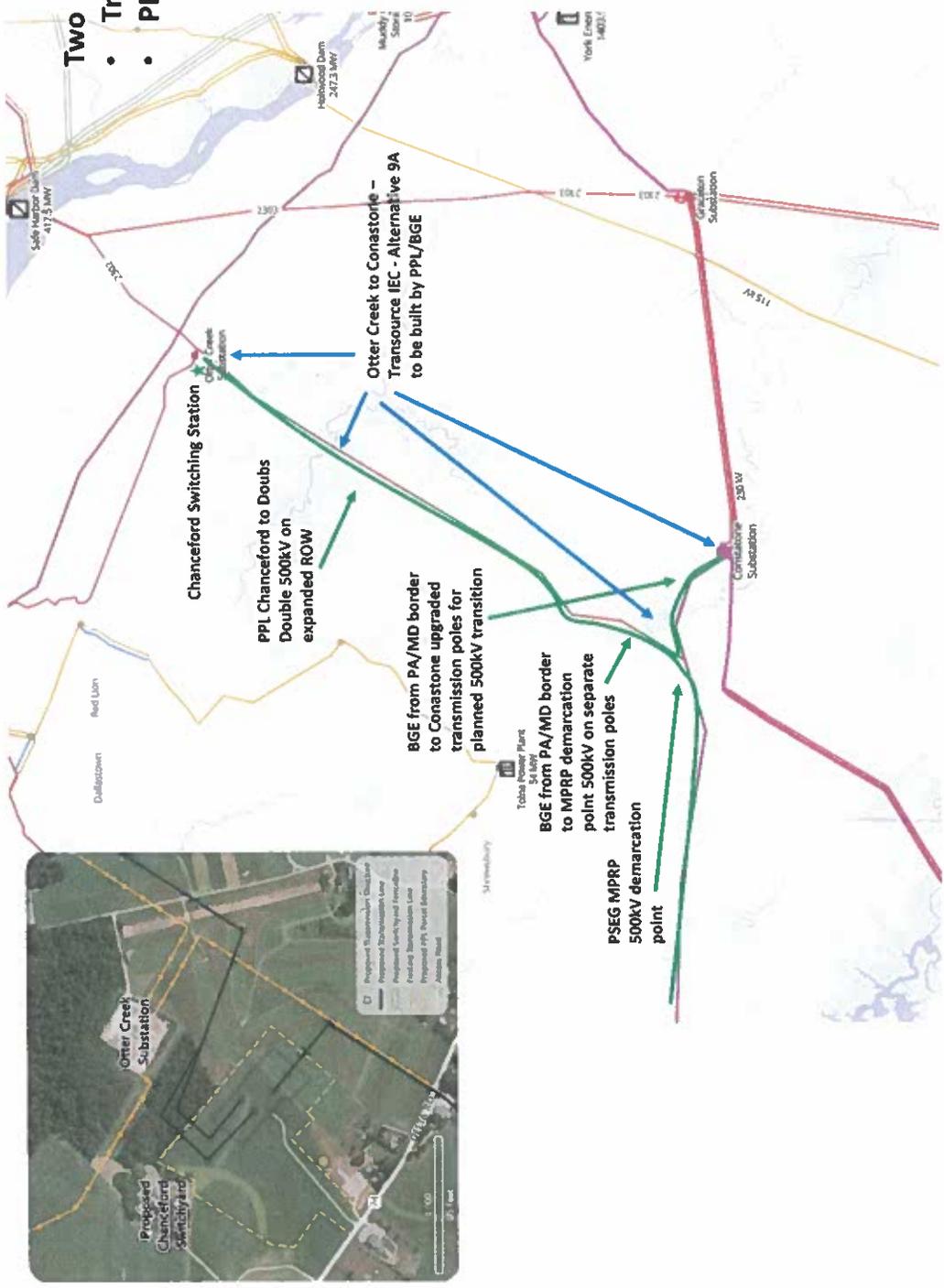
Hoover pointed out that while PJM has a proposed 2027 end date for the building of the transmission line, that is in no way feasible in his eyes, despite [predictions from the managing company behind the regional power grid](#) that Maryland's electrical grid may experience widespread issues that same year if problems aren't addressed.

Joanne Frederick, head of the "Stop MPRP" group, was blunt in her assessment. "The bottom line is this project is unacceptable. There is no amount of explanation that makes it acceptable to take 70 miles of preserved land, farms, et cetera," she said.

PSC will review the [project application](#) and determine if it will move forward. There will be public hearings scheduled in the counties impacted by the proposed route. The schedule for those hearings have yet to be determined.

Two PJM projects in the same corridor?

- Transource 9A –Otter Creek to Conastone
- PPL Chanceford to Doubts



Maryland Piedmont Reliability Project - Proposed Route

- Two PJM projects in the same corridor?**
- Transource 9A – Otter Creek to Conastone
 - PPL to Changeford to Doubs

BGE from PA/MD border to MPRP demarcation point 500kV on separate transmission poles

Otter Creek to Conastone – Transource IEC - Alternative 9A to be built by PPL/BGE approved by MD PSC 6-2020

BGE from PA/MD border to Conastone upgraded transmission poles for planned 500kV transition



<https://delawarevalleyjournal.com/pa-senate-again-votes-to-repeal-rggi/>



PA Senate (Again) Votes to Repeal RGGI

Posted to Energy February 10, 2025 by Linda Stein

The state Senate on Thursday voted 31-18 Thursday to repeal Pennsylvania's membership in the Regional Greenhouse Gas Initiative (RGGI), which Senate Republicans call a tax on electricity for Keystone State ratepayers.

"It is time for Pennsylvania to take charge of its own energy future," said Sen. Gene Yaw (R-Bradford), chair of the Environmental Resources and Energy Committee. "We must close this chapter and move forward with responsible policy that strengthens grid reliability, incentivizes development, creates jobs and protects consumers from higher costs."

RGGI is a cooperative effort among 11 U.S. states to reduce greenhouse gas (GHG) emissions from the power sector. Launched in 2009, RGGI is the first mandatory market-based cap-and-trade program in the United States to address climate change.

RGGI requires fossil fuel power plants with capacity greater than 25 megawatts to obtain an allowance for each ton of carbon dioxide they emit annually. Power plants within the region may comply by purchasing allowances from quarterly auctions, other generators within the region, or offset projects. The costs of those allowances are passed on to ratepayers.

Rather than taking the RGGI proposal through the legislative process, then Gov. Tom Wolf (D) forced Pennsylvania into the compact via executive order in 2019.

Seeking to nail its coffin shut, the Senate passed a bill repealing it for the second time. Entering the compact was a top priority for Wolf, who vetoed a bill that would have required the state's legislature to approve entering the RGGI.

However, Pennsylvania's status in RGGI remains tied up in the courts, with a case pending in the state Supreme Court.

RGGI would "increase electricity rates for consumers, cut energy and has placed a halt on expansion of numerous manufacturing jobs," the state Senate GOP said in a statement. "No new investments in baseload generation have come to Pennsylvania in the six years since the Wolf Administration attempted to enter the state into RGGI."

At what point does PA say NO?

If PA isn't building new thermal generation, then why are we giving our electricity away to MD & VA? What about our manufacturing and data center industries?

They noted that, if adopted, it must be by the legislature, not executive fiat, which is the crux of their court case. Shapiro had appealed a Commonwealth Court decision to the Supreme Court.

"For nearly six years, we have been taking actions to stop the RGGI Electricity Tax," Senate Majority Leader Joe Pittman (R-Armstrong) said. "Even though the Commonwealth Court has ruled RGGI is unconstitutional, Gov. Shapiro has continued his push with the Supreme Court. If the RGGI electricity tax would go into effect, it would mean hundreds of millions of dollars of increases on electric bills, impacting every electricity consumer in this commonwealth. We must help families feeling the strain of inflation – not put more pressure on their household budgets."

The Senate passed a bill to repeal RGGI last year. It died without being adopted by the Democrat-controlled House.

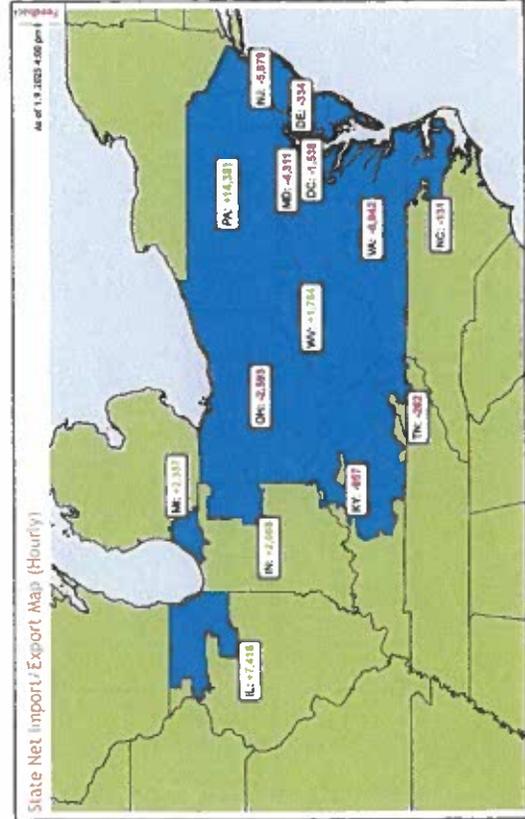
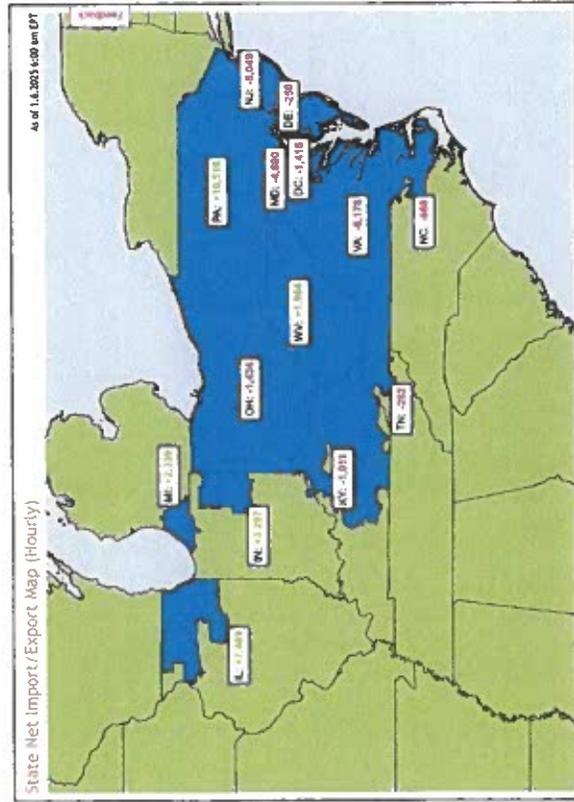
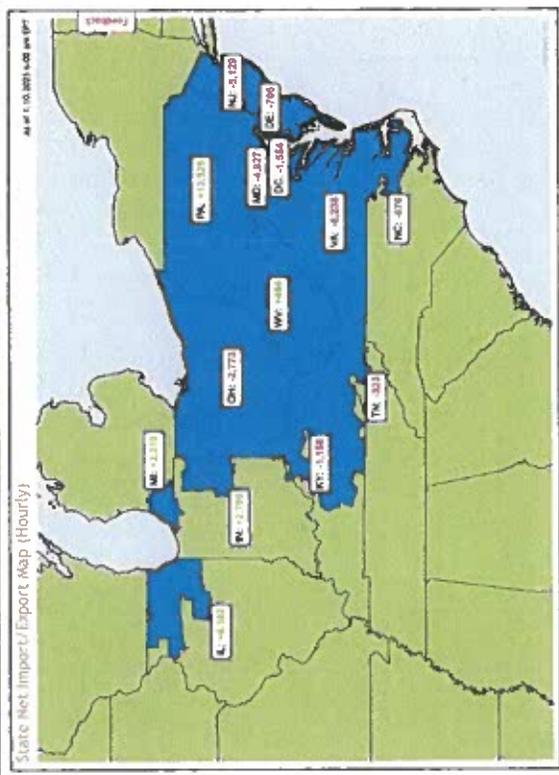
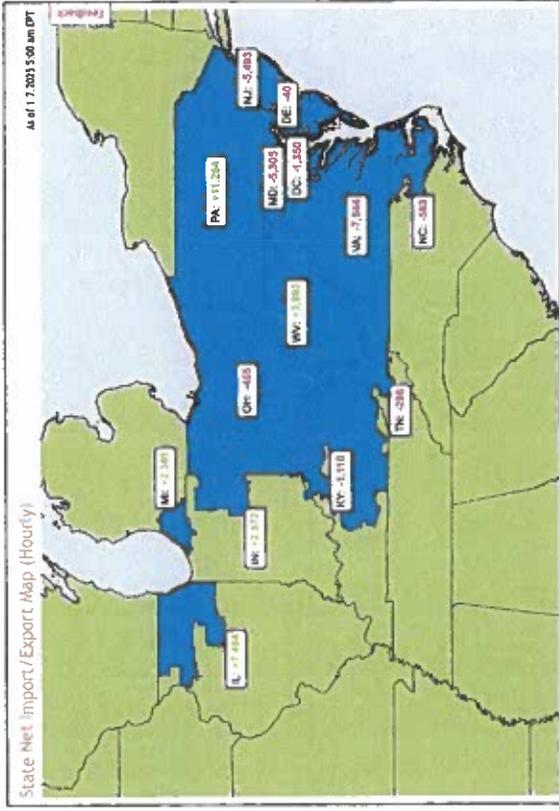
The bill will now go to the House, which is currently tied 101-101 until a special election is held in March.

Shapiro recently put forward an energy proposal that he called the "Lightning Plan."

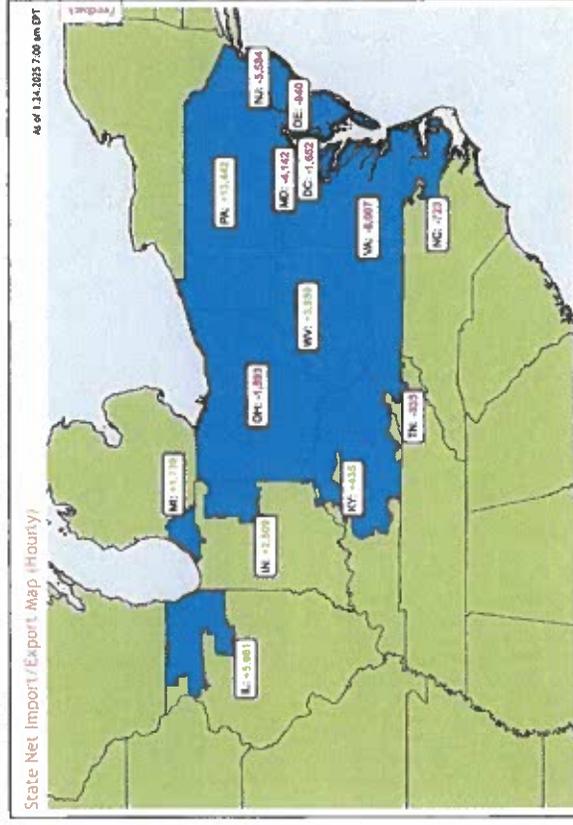
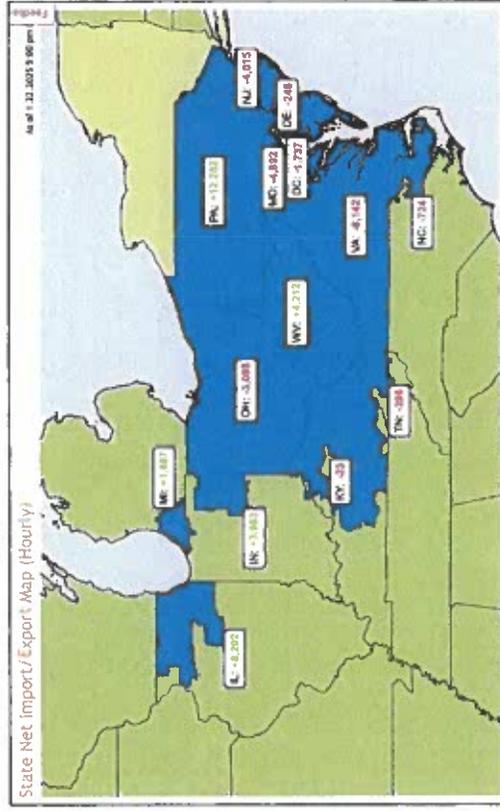
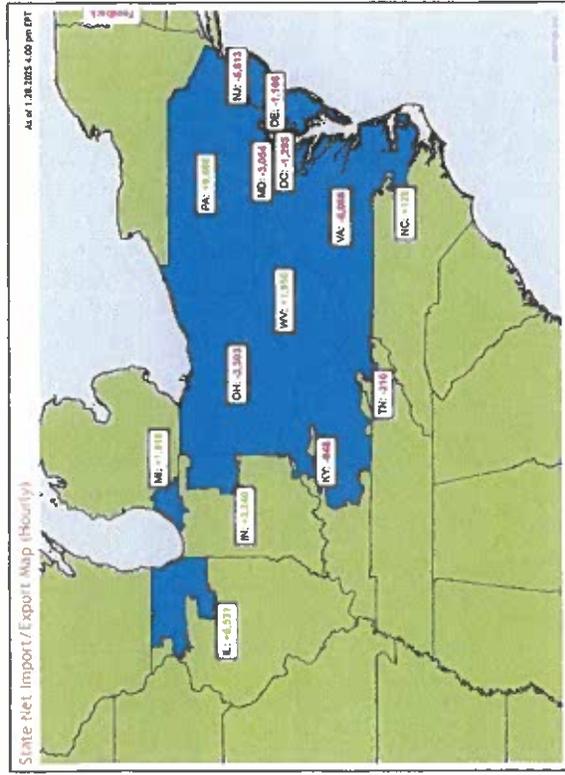
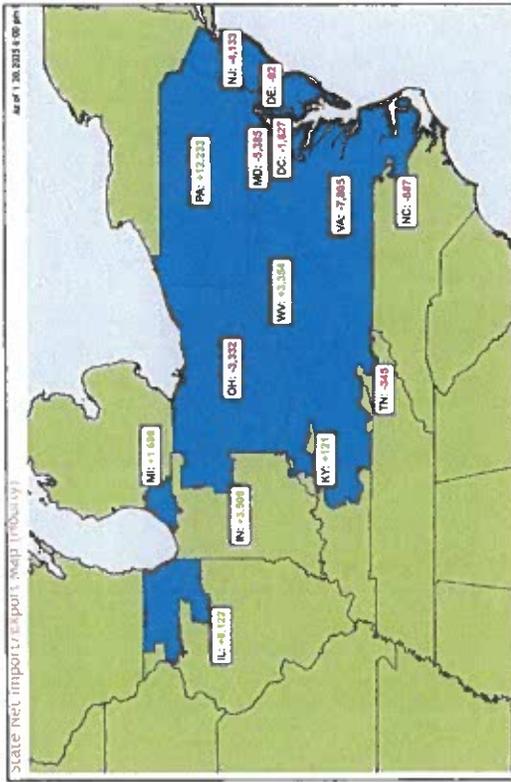
It includes manufacturing tax credits, rebates for energy efficient appliances, a board to approve energy projects, a tax credit program, an investment credit, and regional hydrogen tax credits.

House Speaker Joanna McClinton did not respond to a request for comment, nor did Shapiro.

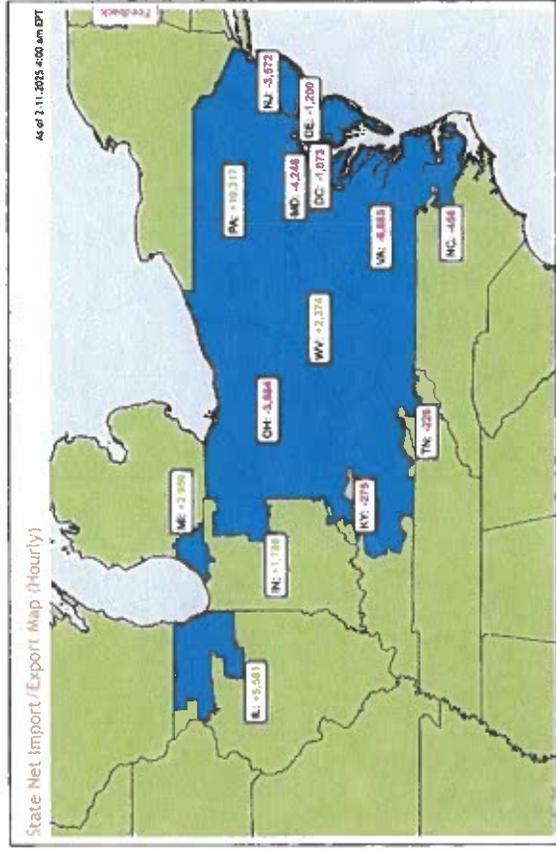
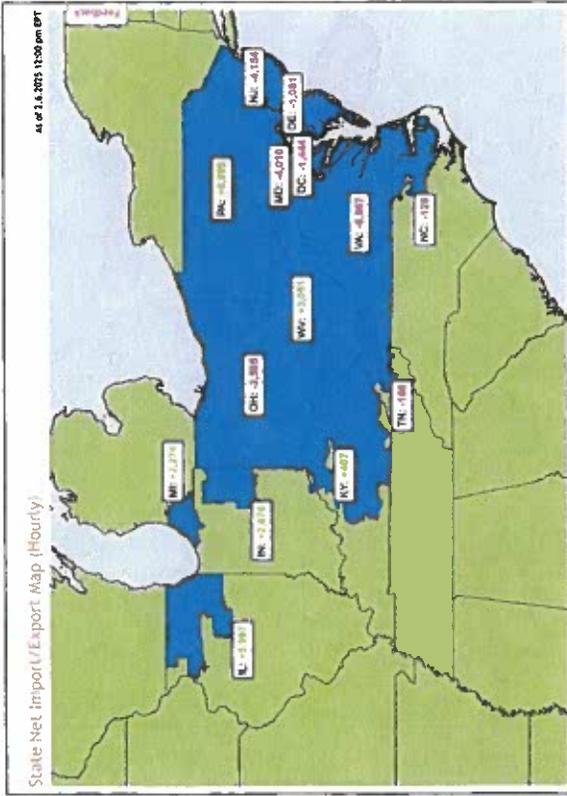
MD & VA hourly imports per PJM State Net Import/Export Maps



MD & VA hourly imports per PJM State Net Import/Export Maps



MD & VA hourly imports per PJM State Net Import/Export Maps



Donnie Collins
Exhibit A

Jeffrey R Eberwein
Senior Right Of Way Specialist

PPL Electric Utilities
827 Hausman Road
Allentown, PA 18104
Tel. 610.774.5458



November 12, 2024

Alvin R & Joyce A Measley
10107 Blue Ball Rd
Stewartstown, PA 17363

Parcel ID: 25000CL0051A0

Re: Final Offer

Dear Alvin R & Joyce A Measley,

As communicated in the initial 15-Day Packet that was delivered to you on February 2, 2024 & July 8, 2024, PPL Electric Utilities Corporation is in the process of widening a Right of Way corridor in your area. A portion of this corridor is located on property you own as indicated above. A Right of Way Agent has been in contact with you throughout the acquisition phase in an attempt to negotiate an Amendment of Public Utility Easement.

PPL is making this final attempt to acquire the agreement with you. The agreement PPL is seeking to acquire will include a survey exhibit that will also be recorded at the York County Office for Recording of Deeds. The total offer of compensation for the easement agreement is \$19,740.00, and this offer to execute an agreement will expire 11/22/2024.

I look forward to hearing from you at your earliest convenience regarding this time-sensitive matter. If you have any questions after reviewing this packet, please reach out either to your Right of Way Agent or to me as we are both available to explain any outstanding concerns.

Please see all of these documents attached:

- Amendment of Public Utility Easement Agreement
- Additional Consideration Agreement
- Survey Exhibit of Easement Area
- For more information concerning this project, please visit <https://www.chancefordproject.com/>.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey R Eberwein". The signature is written in a cursive, flowing style.

Jeffrey R Eberwein
Senior Right Of Way Specialist
PPL Electric Utilities

Jeffrey R Eberwein
Senior Right of Way Specialist

PPL Electric Utilities
827 Hausman Road
Allentown, PA 18104
Tel. 610.774.5458



December 10, 2024

Alvin R & Joyce A Measley
10107 Blue Ball Rd
Stewartstown, PA 17363

Re: PPL Amendment of Public Utility Easement
Parcel ID: 25000CL0051A0

Dear Alvin R & Joyce A Measley,

A Right of Way Agent has previously contacted you concerning PPL's plans to rebuild its existing Otter Creek – Conastone 230kV Transmission Line for double circuit 500kV capacity beginning in 2025 in order to help balance the electric grid and maintain reliability. PPL has attempted to negotiate with you to amend the grant of public utility easement that currently exists on the property you own. Unfortunately, as of today's date we have been unable to reach an agreement regarding the proposed amended easement.

This correspondence serves as official notice that as of the date of this letter, PPL will cease negotiations with you and is no longer seeking new or additional easements across the parcel listed above. In the absence of an agreement to amend the existing easements, PPL will rebuild its facilities in accordance with the rights granted in the existing public utility easement(s). PPL does not plan to utilize eminent domain for any additional rights. We appreciate the time and consideration you have given our offer.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey R Eberwein". The signature is written in a cursive, flowing style.

Jeffrey R Eberwein
Senior Right of Way Specialist
PPL Electric Utilities

Feb. 12, 2025

To whom ever wants to take
advantage of Chanceford Township.

Our role in Chanceford Township
is to produce food, necessary
for living.

Our role is not to provide
for electrical needs outside
of this township.

We do not need your plan to
interfere with our plans.

Sincerely protecting
our land,

Ralene M. Miller

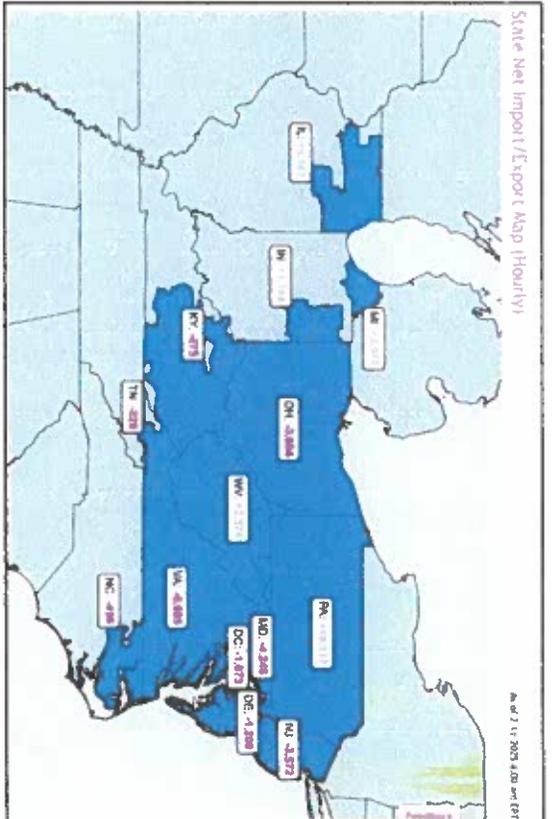
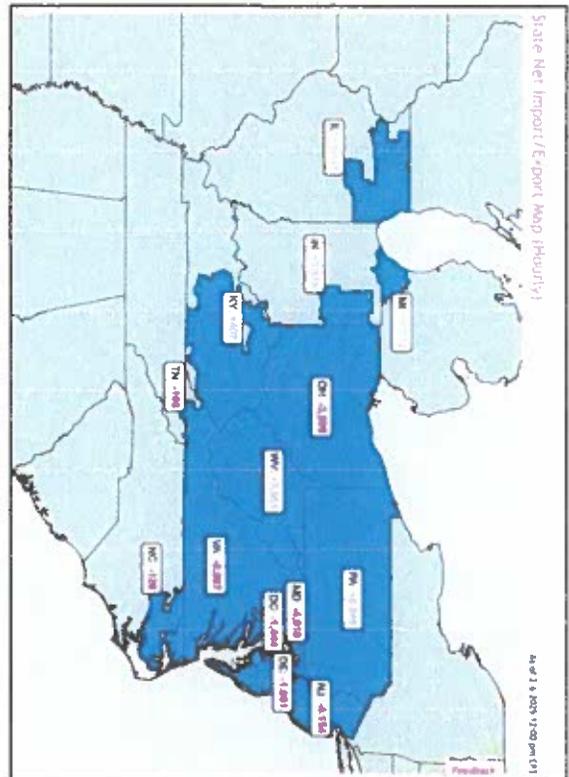
James M. Miller

478 Muddy Creek

Fort ~~B~~ Rd.

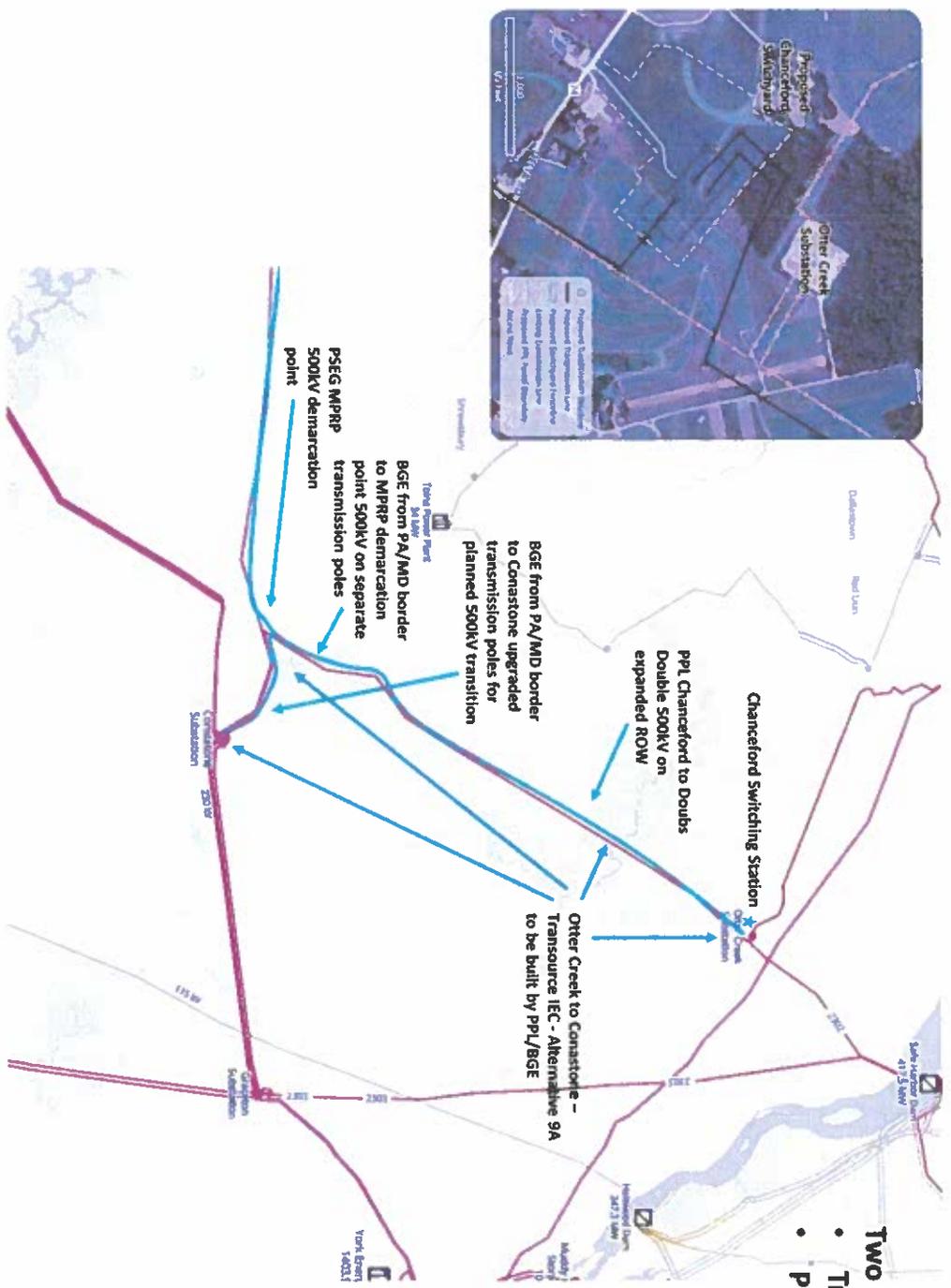
Broque PA 17309

MD & VA hourly imports per PJM State Net Import/Export Maps



Dolan, Kenneth Sr B.

- Two PJM projects in the same corridor?
- Transource 9A --Otter Creek to Conastone
- PPL Chanceford to Doubts



Maryland Piedmont Reliability Project - Proposed Route



- Two PJM projects in the same corridor?
- Transource 9A—Otter Creek to Conastone
- PJM/Chanceford to Doubs

Deloni Kurish Esq. C

<https://delawarevalleyjournal.com/pa-senate-again-votes-to-repeal-rggi/>



PA Senate (Again) Votes to Repeal RGGI

Posted to *Energy* February 10, 2025 by *Linda Skala*

The state Senate on Thursday voted 31-18 Thursday to repeal

Pennsylvania's membership in the Regional Greenhouse Gas Initiative

(RGGI), which Senate Republicans call a tax on electricity for Keystone State ratepayers.

"It is time for Pennsylvania to take charge of its own energy future," said Sen. Gene Yaw (R-Bradford), chair of the Environmental Resources and Energy Committee. "We must close this chapter and move forward with responsible policy that strengthens grid reliability, incentivizes development, creates jobs and protects consumers from higher costs."

RGGI is a cooperative effort among 11 U.S. states to reduce greenhouse gas (GHG) emissions from the power sector. Launched in 2009, RGGI is the first mandatory market-based cap-and-trade program in the United States to address climate change.

RGGI requires fossil fuel power plants with capacity greater than 25 megawatts to obtain an allowance for each ton of carbon dioxide they emit annually. Power plants within the region may comply by purchasing allowances from quarterly auctions, other generators within the region, or offset projects. The costs of those allowances are passed on to ratepayers.

Rather than taking the RGGI proposal through the legislative process, then-Gov. Tom Wolf (D) forced Pennsylvania into the compact via executive order in 2019.

Seeking to nail its coffin shut, the Senate passed a bill repealing it for the second time. Entering the compact was a top priority for Wolf, who vetoed a bill that would have required the state's legislature to approve entering the RGGI.

However, Pennsylvania's status in RGGI remains tied up in the courts, with a case pending in the state Supreme Court.

RGGI would "increase electricity rates for consumers, cut energy and has placed a halt on expansion of numerous manufacturing jobs," the state Senate GOP said in a statement. "The new investments in base-load generation have come to Pennsylvania in the six years since the Wolf Administration attempted to enter the state into RGGI."

**At what point does PA say NO?
If PA isn't building new thermal generation, then why
are we giving our electricity away to MD & VA? What
about our manufacturing and data center industries?**

They noted that, if adopted, it must be by the legislature, not executive fiat, which is the crux of their court case. Shapiro had appealed a Commonwealth Court decision to the Supreme Court.

"For nearly six years, we have been taking actions to stop the RGGI Electricity Tax," Senate Majority Leader Joe Pittman (R-Armstrong) said. "Even though the Commonwealth Court has ruled RGGI is unconstitutional, Gov. Shapiro has continued his push with the Supreme Court. If the RGGI electricity tax would go into effect, it would mean hundreds of millions of dollars of increases on electric bills, impacting every electricity consumer in this commonwealth. We must help families feeling the strain of inflation - not put more pressure on their household budgets."

The Senate passed a bill to repeal RGGI last year. It died without being adopted by the Democrat-controlled House.

The bill will now go to the House, which is currently tied 101-101 until a special election is held in March. Shapiro recently put forward an energy proposal that he called the "Lightning Plan."

It includes manufacturing tax credits, rebates for energy efficient appliances, a board to approve energy projects, a tax credit program, an investment credit, and regional hydrogen tax credits.

House Speaker Joanna McClintock did not respond to a request for comment, nor did Shapiro.