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File #: 212097

September 8, 2025

VIA ELECTRONIC FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Letter Of Notification Of Mid-Atlantic Interstate Transmission LLC For Approval To Rebuild Approximately 2.0 Miles Of The Existing Single-Circuit Lincoln-Orrtanna 115 Kilovolt Transmission Line Located In Straban Township, Adams County, Pennsylvania
Docket No. A-2025-3057017**

Dear Secretary Homsher:

Enclosed please find the responses of Mid-Atlantic Interstate Transmission, LLC (“MAIT”) to the first set of data requests served by the Commission’s Bureau of Technical Utility Services (“TUS”) via Secretarial Letter on August 29, 2025, in the above-referenced matter.

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

Respectfully submitted,


Garrett P. Lent

GPL/dmc
Attachment

cc: Jordan Van Order (*via email; w/attachment*)
Certificate of Service

Letter of Notification of Mid-Atlantic Interstate Transmission, LLC for Approval to Rebuild a Section of the Lincoln – Orrtanna 115 kV Transmission Line in Adams County, Pennsylvania.

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QUESTION A-1

Reference the Letter of Notification, Paragraph 8. Please describe the condition and anticipated service life of the existing transmission structures to be replaced.

Response:

Thirteen (13) of the existing structures that will be replaced under the scope of this Project have maintenance related conditions that require replacement, the majority being shell rot or wind shake found during a 2021 wood pole inspection. There are also another thirteen (13) records for closed historical maintenance conditions on this section of line. The average install date of these poles is 1965, making the structures approximately 60 years old.

While the overall maintenance condition of this line is not the driver for the rebuild, MAIT uses FirstEnergy's EtF Methodology which involves review and assessment of existing transmission facilities for equipment characteristics that are near or beyond their existing service life, contain components that are obsolete, or pose reliability risk to the system. To determine whether lines should be rehabbed, rebuilt, or replaced based on their age, performance, system criticality, risk and condition-based assessment, the following global characteristics may be considered:

- Customer/Contingency Risk.
- Negative impact on equipment health and/or system reliability.
- Customer outage frequency and/or durations.
- Increasing negative trend in maintenance findings and/or costs.
- Failure risk, to the extent caused by asset design characteristics, or historical industry/company performance data.
- Operation, design, or installation limitations.
- Age/condition of wood pole transmission line structures typically replacement is considered beginning at 40 years of average age for a line segment.
- Must pass a hammer sound test.
- Age/condition of steel tower or steel pole transmission line structures typically replacement is considered beginning at 60 years of average age for a line segment.
- Age/condition of transmission line conductors and hardware typically replacement is considered beginning at 40 years of average age for a line segment.

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- System characteristics including lightning and grounding performance, galloping overlap, insulation coordination, structural capacity needs, and future needs (e.g., fiber path).
- Current design criteria, applicable codes, and industry best practices.
- Environmental Factors.
- Lack of resiliency or system-hardening attributes.

When evaluating the replacement of in-service transmission line assets, the review may also consider maintenance operating experience, manufacturer and accepted industry practices, and current engineering design standards.

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QUESTION A-2

Reference the Letter of Notification, Paragraph 15. Please explain whether load growth in the area has led to any change in circumstances as it relates to the need for the subject project. If so, please quantify these load growth impacts.

Response:

Load growth in portions of the PJM Region has contributed to the need for the Lincoln-Orrtanna 115 kV Transmission Line Rebuild Project. PJM has observed a significant increase in electric load growth in the PJM Region after a decade or more of flat load growth. Throughout 2022, projected load growth continued to increase rapidly and beyond what was originally anticipated as part of the 2022 PJM Load Forecast published in January 2022. PJM created a 2022 Modified Load Forecast for 2027 for the Maryland (APS) and DOM (Virginia) zones that considered approximately 1,200 MW and 2,700 MW of additional load, respectively. The increased load growth combined with the generation deactivations required both new transmission facilities and transmission upgrades to address the extensive, severe and widespread reliability criteria violations.

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QUESTION A-3

Reference the Letter of Notification, Paragraph 15. Please provide the specific NERC or other regulatory standard criteria which is driving the subject project.

Response:

NERC’s Transmission Planning (“TPL”) Standard TPL-001-5.1¹, is driving the need for the Lincoln – Orrtanna Rebuild Project. The analysis indicated a planning criteria violation, i.e., thermal overload violation on the Lincoln – Orrtanna 115 kV Transmission Line upon loss of the Hunterstown–Lincoln 115 kV Transmission Line for a single contingency event. Upon loss of the Hunterstown–Lincoln 115 kV Transmission Line, the Lincoln–Orrtanna 115 kV Transmission Line overloads to 140% of the existing summer emergency rating of 160 MVA.

¹ <https://www.nerc.com/pa/Stand/Reliability%20Standards/TPL-001-5.pdf>
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QUESTION A-4

Reference the Letter of Notification, Paragraph 15. Please explain why the NERC, or other regulatory standard, is now an issue where it wasn't previously.

Response:

Prior to 2022, load growth was moderate, gradual, and geographically dispersed. Incremental infrastructure upgrades based on conservative forecasts would address the identified reliability criteria violations. However, clustering of large loads after 2022 created localized system stress that was not previously modeled. This resulted in thermal overloads, voltage collapse risks, and insufficient transfer margins, directly triggering reliability concerns and requiring holistic and large-scale solutions.

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QUESTION A-5

Reference the Letter of Notification, Paragraph 15. Please explain whether the increase in data centers in the northern Virginia area has contributed to the need for the subject project.

Response:

Regional load increases, including those from data centers in Maryland and northern Virginia, have driven the need for transmission upgrades, including the Lincoln–Orrtanna 115 kV Transmission Line Rebuild Project. The increased load growth combined with the generation deactivations resulted in extensive, severe, and widespread thermal and voltage reliability criteria violations spanning throughout the study area.

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QUESTION A-6

Reference the Letter of Notification, Paragraph 15. Please explain whether the announced retirement of the Brandon Shores Generating Station Unit 1 and Unit 2 has contributed to the need for the subject project.

Response:

The announced retirement of Brandon Shores Generating Station Units 1 and 2 (approximately 1,300 MW) has contributed to the need for the Lincoln–Orrtanna 115 kV Transmission Line Rebuild Project. The retirement of the Brandon Shores Generating units will reduce the available generation capacity, increasing the need for reliable transmission infrastructure with additional capacity, which is one of the benefits of the proposed Project.

