
Megan E. Rulli

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File #: 212097

November 12, 2025

VIA ELECTRONIC FILING

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

Re: Application of Mid-Atlantic Interstate Transmission, LLC Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the Carroll-Hunterstown 230 Kilovolt Transmission Line Located in Straban, Mount Pleasant, Mount Joy, and Germany Townships, Adams County, Pennsylvania. Docket No. A-2025-3056951

Dear Secretary Homsher:

Attached for filing is the Prehearing Conference Memorandum of Mid-Atlantic Interstate Transmission, LLC ("MAIT") in the above-referenced proceeding.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/dmc
Attachment

cc: The Honorable Steven K. Haas (*via email; w/attachment*)
The Honorable Charece Z. Collins (*via email; w/attachment*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST-CLASS MAIL

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400 Market St., 9th Floor
Harrisburg, PA 17105
CC: Secretary to PADEP Chief Counsel

PA Department of Environmental Protection
ATTN: Bureau of Waterways Engineering
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Office of Consumer Advocate
555 Walnut Street
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Date: November 12, 2025


Megan E. Rulli

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**APPLICATION OF MID-ATLANTIC :
INTERSTATE TRANSMISSION, LLC :
FILED PURSUANT TO 52 PA. CODE : Docket No. A-2025-3056951
CHAPTER 57, SUBCHAPTER G, FOR :
APPROVAL OF THE SITING AND :
CONSTRUCTION OF THE CARROLL- :
HUNTERSTOWN 230 KILOVOLT :
TRANSMISSION LINE LOCATED IN :
STRABAN, MOUNT PLEASANT, :
MOUNT JOY, AND GERMANY :
TOWNSHIPS, ADAMS COUNTY, :
PENNSYLVANIA :**

**PREHEARING CONFERENCE MEMORANDUM
OF MID-ATLANTIC INTERSTATE TRANSMISSION, LLC**

Pursuant to the Prehearing Conference Order of Administrative Law Judges Steven K. Haas and Charece Z. Collins (the “ALJs”), dated September 30, 2025, and 52 Pa.Code §§ 5.221 - .224, Mid-Atlantic Interstate Transmission, LLC (“MAIT”) hereby submits its Prehearing Conference Memorandum.

I. SERVICE ON MAIT

1. MAIT will be represented in this case by the counsel named below. Copies of all documents should be served on MAIT as follows:

Tori L. Giesler (ID #207742)
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MAIT also requests that a copy of all notices and communications regarding this matter be sent to:

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Transmission Siting Supervisor
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Akron, OH 44320
mcargill@firstenergycorp.com

Please be advised that Ms. Megan E. Rulli will speak as the lead attorney for MAIT for purposes of the prehearing conference. However, other counsel for MAIT will be participating and available during the telephonic prehearing conference as needed.

II. BACKGROUND

2. On August 8, 2025, MAIT filed, pursuant to the Pennsylvania Public Utility Commission's ("Commission") regulations at 52 Pa. Code § 57.72 *et seq.* and its Interim Guidelines for the Filing of Electric Transmission Line Siting Applications at 52 Pa. Code § 69.3101 *et seq.*, an application requesting the Commission's approval to construct approximately 12.9 miles of 230 kilovolt ("kV") transmission line by rebuilding the existing 115 kV and 138 kV transmission lines between the Pennsylvania-Maryland border and Hunterstown Substation to double-circuit 230/115 kV and 230/138 kV lines, respectively (together, the "Carroll-Hunterstown

230 kV Transmission Line” or “Project”).¹ The proposed Carroll–Hunterstown 230 kV Transmission Line will cross 12.9 miles in Straban, Mount Pleasant, Mount Joy, and Germany townships in Adams County, Pennsylvania. In addition to the portions of the Carroll–Hunterstown 230 kV Transmission Line located in Pennsylvania, approximately 11.3 miles of the proposed Carroll–Hunterstown 230 kV Transmission Line will be located in Carroll County, Maryland,² terminating at Carroll Substation.

3. On September 30, 2025, the ALJs issued a Prehearing Conference Order providing, among other things, that a Telephonic Prehearing Conference would be held on November 24, 2025, at 10:00 a.m. The Prehearing Conference Order also provided that formal protests and petitions to intervene must be filed in accordance with 52 Pa. Code (relating to public utilities) on or before November 17, 2025. As of the date of this memorandum, MAIT has not been served with any protests or interventions in this matter. In addition, no protests or interventions appear to have been filed with the Commission at Docket No. A-2025-3056951.

4. The Carroll–Hunterstown 230 kV Transmission Line is needed to increase the current-carrying capacity of the existing Carroll–Hunterstown corridor that connects Hunterstown Substation in Adams County, Pennsylvania, to Carroll Substation in Carroll County, Maryland to meet current and expected transmission system needs in Adams and Carroll counties and the surrounding areas. Moreover, the preferred route for the Project is the most reasonable of the

¹ Related to the proposed Carroll–Hunterstown 230 kV Transmission Line, on August 22, 2025, MAIT filed a separate Letter of Notification pursuant to Sections 57.72(d)(1)(i) and (vi) of the Public Utility Commission’s regulations, 52 Pa. Code §§ 57.72(d)(1)(i) and (vi), to rebuild approximately 2.0 miles of the existing Lincoln–Orrtanna 115 kV Transmission Line to accommodate a higher capacity conductor (the “Lincoln–Orrtanna Rebuild Project”). The Lincoln–Orrtanna Rebuild Project is designed to address the same transmission system needs as the proposed Carroll–Hunterstown 230 kV Transmission Line. Collectively, the Carroll–Hunterstown 230 kV Transmission and the Lincoln–Orrtanna Rebuild Project are referred to herein as the “Carroll–Hunterstown Improvements Project.”

² The portion of the proposed Carroll–Hunterstown 230 kV Transmission Line located in Carroll County, Maryland will be the subject of a separate filing with the Maryland Public Service Commission (“MDPSC”) and not a subject of this filing.

alternative routes considered because, among other things, it minimizes the effect of the transmission line on the natural and human environment while limiting the amount of new right-of-way needed.

III. ISSUES

5. MAIT intends to demonstrate that the above-captioned Project satisfies the criteria applicable to the Commission's approval of high-voltage electric transmission lines at 52 Pa. Code § 57.72 *et seq.* and its Interim Guidelines for the Filing of Electric Transmission Line Siting Applications at 52 Pa. Code § 69.3101 *et seq.* MAIT further submits that it has satisfied these requirements based upon the information included in its initial filing, which includes its written direct testimony and exhibits.

6. Notice of the above-captioned siting application was published in the September 13, 2025, edition of the *Pennsylvania Bulletin*. The deadline for the submission of a petition to intervene and/or protest in this matter is November 17, 2025. MAIT has not been served with any petition to intervene and/or protest to date, and it does not appear that any petition to intervene and/or protest has been filed with the Commission. Therefore, MAIT is not aware of any actual or potential intervenors.

7. In the absence of adverse parties, there is no need for an evidentiary hearing before the ALJs. As such, MAIT respectfully requests and moves that this matter be assigned to the Commission's Bureau of Technical Utility Services ("TUS") for review and disposition. To the extent that other parties intervene in this proceeding, and such interventions necessitate the establishment of a procedural schedule, MAIT will work with any parties to develop a proposed litigation schedule, as addressed below in Section VII, *infra*.

IV. WITNESSES

8. In the event a hearing or hearings occur, MAIT will provide the testimonies of the following witnesses, as may be necessary.

Witness	Subjects Addressed
Mary E. Anderson Supervisor, Transmission Siting East FirstEnergy Service Company 341 White Pond Drive Akron, OH 44320	Overview of the Project Public Notice and Outreach for the Project
Jacquelyn Lojek Manager, Transmission Planning FirstEnergy Service Company 800 Cabin Hill Drive Greensburg, Pennsylvania 15601	Electrical Need for the Project Electromagnetic Field Calculations and Mitigation Procedures Description of Alternatives Considered
Barry A. Baker Vice President AECOM Technical Services Corporation 625 West Ridge Pike, Suite E-100 Conshohocken, Pennsylvania 19428	Siting Analysis Environmental Assessment Proposed Route and Selection Process
Lisa Marinelli Senior Real Estate Representative FirstEnergy Service Company 800 Cabin Hill Drive Greensburg, Pennsylvania 15601	Acquisition of Easements and Land Rights MAIT Code of Conduct for Interaction with Affected Property Owners
Kory R. Swierczek Director – Transmission Engineering ExecuPOWER, LLC 555 Croton Road, Suite 307 King of Prussia, Pennsylvania 19406	Project Design and Engineering Project Construction and Operation Vegetation Management
Andrew Gledhill Manager of the Resource Adequacy Planning Department PJM Interconnection, L.L.C. 2750 Monroe Blvd. Audobon, Pennsylvania 19403	PJM’s Load Forecasting Process Long-Term Load Forecasts Relied on by PJM for the 2022 Window 3 Competitive Solicitation Process
Sami Abdulsalam, Ph.D., P.Eng. Director of Transmission Planning PJM Interconnection, L.L.C. 2750 Monroe Blvd. Audobon, Pennsylvania 19403	PJM Regional Transmission Expansion Plan Process Reliability Need for the Project

9. MAIT reserves the right to call additional witnesses, as necessary. If MAIT determines an additional witness or witnesses will be necessary for any portion of its case, the

ALJs and all parties of record – to the extent there are any beyond MAIT – will be notified promptly.

V. EVIDENCE

10. At this time, MAIT submits that the above-captioned proceeding can be resolved by reliance upon the information included in its initial filing, and associated direct testimony. To the extent that other parties ultimately participate in this proceeding, MAIT reserves the right to respond to any evidence presented by another party and to rely upon any evidence presented by another party.

VI. PROCEDURAL RULES / DISCOVERY

11. MAIT is not requesting any modification of the Commission’s procedural rules regarding discovery at this time. MAIT agrees to cooperate with the parties – to the extent there are any – regarding any requested modification to the Commission’s procedural discovery rules.

VII. PROPOSED SCHEDULE

12. To the extent that a hearing(s) becomes necessary, MAIT proposes the following procedural schedule:

PROPOSED SCHEDULE

Filing and Service of Application ³	August 8, 2025
Other Parties’ Direct Testimony	January 6, 2025
MAIT’s Rebuttal Testimony	February 3, 2026
Hearings	February 17 and 18, 2025
Main Brief	March 4, 2025
Reply Brief	March 16, 2025

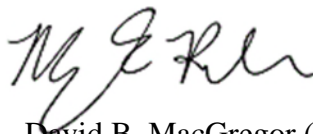
³ MAIT’s direct testimony was included in its initial filing.

MAIT will work with parties and the ALJs to modify the schedule as may be necessary, should the proceeding not be referred to TUS.

VIII. SETTLEMENT

13. As of this time, no other parties have intervened in this proceeding and, therefore, no settlement discussions have been held. To the extent other parties join this proceeding, MAIT remains open and available for settlement discussions with the other parties and would support initiatives to begin settlement discussions at the earliest possible date.

Respectfully submitted,



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