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December 30, 2025

**Via Electronic Filing**

Matthew Homsher, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

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 kV Transmission Line Located in Straban, Mount Pleasant, Mount Joy and Germany Townships, Adams County, Pennsylvania, Docket No. A-2025-3056951

Dear Secretary Homsher:

Enclosed for electronic filing please find Hunterstown Generation LLC's Petition to Intervene with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

*Bryce R. Beard*

Bryce R. Beard

BRB/red

Enclosure

cc: The Honorable Steven K. Haas (via email [sthaas@pa.gov](mailto:sthaas@pa.gov))  
The Honorable Charece Z. Collins (via email [charcollin@pa.gov](mailto:charcollin@pa.gov))  
Bureau of Technical Utility Services (c/o Jordan Van Order via email [jvanorder@pa.gov](mailto:jvanorder@pa.gov))

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**PETITION TO INTERVENE OF  
HUNTERSTOWN GENERATION LLC AND REQUEST FOR  
PREHEARING CONFERENCE**

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Pursuant to 52 Pa. Code §§ 5.72-5.75 of the regulations of the Pennsylvania Public Utility Commission (“PUC” or “Commission”) and the public notice published in the *Pennsylvania Bulletin* on September 13, 2025, Hunterstown Generation LLC (“HGLLC”) files this Petition to Intervene *Nunc Pro Tunc* to the above-captioned Application (“Application”) filed by Mid-Atlantic Interstate Transmission, LLC (“MAIT”). In support of its Petition, HGLLC states as follows:

**I. PETITION TO INTERVENE**

1. On August 8, 2025, the MAIT filed the above-captioned Application with the Commission seeking approval of the proposed rebuilding of and related work on the Carroll–Hunterstown 230 kV Transmission Line (“Transmission Line”) between the Hunterstown Substation in Adams County, Pennsylvania, and the Carroll Substation in Carroll County, Maryland.

2. Both the Hunterstown Substation and part of the Transmission Line are located within easements across the real estate owned by HGLLC (“Property”). The Property consists of about 298.91 acres of deeded acreage in Adams County, Pennsylvania.

3. HGLLC is a generator of electricity on the Property, located at the terminus of the Transmission Line at the Hunterstown Substation. HGLLC owns and operates a 863-megawatt (MW) combined cycle natural gas-fired generation plant. HGLLC is a wholly-owned subsidiary of LS Power Development, LLC. (“LS Power”). The generation plant became operational in 2003. The plant (as well as the Property) was purchased by LS Power in July 2024 from Platinum Equity Capital Partners IV L.P. Upon purchase by LS Power, the name of Pennsylvania entity 6728634 was changed from Kestrel Acquisition, LLC to HGLLC.

4. HGLLC is actively working to develop its potential to expand its generation facilities in order to meet the ever growing demand for electricity.

5. The current location of the proposed Transmission Line, if approved, will directly impact HGLLC and its potential to expand its generation facilities.

6. With the Application, MAIT included a “Notice of Filing” purporting to serve notice of the Application on impacted parties.

7. MAIT’s Notice of Filing was, however, deficient and was not served on HGLLC.

8. In the Notice of Filing, MAIT identifies HGLLC’s predecessor<sup>1</sup> as an entity served:

Kestrel Acquisition, LLC  
8403 Colesville Road  
Suite 915  
Silver Spring, MD 20910

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<sup>1</sup> Upon purchase by LS Power, the name of Pennsylvania entity 6728634 was changed from Kestrel Acquisition, LLC to Hunterstown Generation, LLC.

9. HGLLC is unrelated and has no existing relationship with Kestrel Acquisition, LLC. Additionally, HGLLC has no relationship with the address identified above.

10. The Commission published notice of the Application in the *Pennsylvania Bulletin* on September 13, 2025

11. By Order entered September 30, 2025, Administrative Law Judges Steven K. Haas and Charece Z. Collins issued a Prehearing Conference Order directing, among other things, that formal protests and petitions to intervene must be filed on or before November 17, 2025.

12. HGLLC first became aware of this Application on December 3, 2025 due in part to inadequate notice of filing by MAIT. Since that time, HGLLC has communicated with MAIT on reaching solutions to minimize the impact of MAIT's application and ultimate line location.

13. HGLLC's attorneys in this matter are:

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14. The Commission's regulations allow intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A "person" includes a corporation and an association. 52 Pa. Code § 1.8.

15. HGLLC meets the standards for intervention set forth in 52 Pa. Code § 5.72(a).

As discussed above, HGLLC is a generator of electricity on the Property located at the terminus of the Transmission Line at the Hunterstown Substation. As proposed in the Application, MAIT's Transmission Line within the HGLLC Property will directly impact HGLLC's potential to expand its generation facilities in order to meet the ever growing demand for electricity generation. Additionally, HGLLC believes that minor modifications will ensure that both HGLLC's future expansion as well as MAIT's Transmission Line are both accommodated. Due to HGLLC's business, MAIT's Transmission Line, if approved, will not only directly harm HGLLC but will impact the expansion of critical generation capacity needed in the electricity market today, directly harming the public interest.

16. HGLLC's interests in this proceeding are unique from and not adequately represented by other parties that may seek to intervene. Indeed, no other parties intervened in this proceeding, and the modifications HGLLC seeks only involve areas where the Transmission Line crosses HGLLC's property. No other entity can represent this interest, and no other entity can represent HGLLC's interest in insuring future generation capacity build out at the Hunterstown Substation.

17. HGLLC will be bound by the action of the Commission in this proceeding. To the extent that MAIT's requested relief is granted, HGLLC will be deprived of the beneficial use of its property without modifications to the Transmission Line path across its property.

18. HGLLC's intervention is in the public interest. Through HGLLC's participation, the Commission will be able to ensure that the expansion of critical generation capabilities are not impacted.

19. HGLLC continues to review MAIT's filing and will be identifying other issues to be addressed in this proceeding. HGLLC does not anticipate significant delays in the Application's approval will occur due to the minor modifications needed and is actively working with MAIT to reach a practical solution.

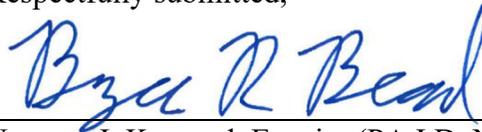
## II. REQUEST FOR PREHEARING CONFERENCE

20. HGLLC respectfully requests that the December 9, 2025 Order of Administrative Law Judges Steven K. Haas and Charece Z. Collins referring this matter to the Commission's Bureau of Technical Utility Service be rescinded so as to allow HGLLC to protect its critical interests which directly impact the Commonwealth's generation capacity and future expansion of electric generation at Hunterstown on HGLLC's property.

21. HGLLC, therefore, requests that this matter be scheduled for a Prehearing Conference, in an expedited fashion, so as to set forth a mutually agreeable procedural schedule to address the limited scope of issues in this proceeding.

**WHEREFORE**, Hunterstown Generation, LLC respectfully requests that the Commission grant its Petition to Intervene and schedule this matter for a Prehearing Conference to establish an expedited procedural schedule due to the narrow issues involved so as to not delay the disposition of the Application.

Respectfully submitted,



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Norman J. Kennard, Esquire (PA I.D. No. 29921)  
Bryce R. Beard, Esquire (PA. I.D. No. 325837)  
Eckert Seamans Cherin & Mellott, LLC  
213 Market St., 8th Floor  
Harrisburg, PA 17101  
Phone 717.237.6000  
Fax 717.237.6019

Date: December 30, 2025

Attorneys for Hunterstown Generation, LLC

## Verification

I, Anthony Hammond, am the Authorized Representative for Hunterstown Generation LLC (“HGLLC”). I hereby state that the facts set forth in the foregoing **Petition to Intervene** are true and correct to the best of my knowledge, information and belief and that I expect HGLLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to sworn falsification to authorities).

Dated: December 30, 2025

DocuSigned by:  
*Anthony Hammond*  
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Anthony Hammond  
Authorized Representative  
LS Power  
Hunterstown Generation LLC

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of Hunterstown Generation LLC (“HGLLC”) forthgoing documents upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via Email Only**

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Garrett P. Lent Esquire  
Megan E. Rulli Esquire  
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Date: December 30, 2025

*/s/ Bryce R. Beard*  
Bryce R. Beard