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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 Protest *Nunc Pro Tunc* 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 : Docket No. A-2025-3056951  
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 :

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**PROTEST *NUNC PRO TUNC* OF  
HUNTERSTOWN GENERATION LLC**

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Pursuant to 52 Pa. Code §§ 5.51-5.53 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 *Protest Nunc Pro Tunc* to the above-captioned Application filed by Mid-Atlantic Interstate Transmission, LLC (“MAIT”). In support of its Protest, HGLLC states as follows:

1. On August 8, 2025, MAIT filed an 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 generation.

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

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

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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.

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.

13. HGLLC's attorneys in this matter are:

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Bryce R. Beard, Esquire  
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14. The Commission's regulations allow the filing of protests when a party has an interest in the matter and sets forth facts to support its grounds for protesting the application. 52 Pa. Code § 5.52.

15. HGLLC meets the standards for filing this Protest *Nunc Pro Tunc*. As discussed below, MAIT's proposed transmission route at its terminus in Hunterstown will directly impact HGLLC and its planned generation facilities.

16. In its Application, MAIT states it has existing easements across HGLLC's property. The Application does not clearly distinguish between existing easements and proposed easements across HGLLC's property.

17. One existing easement across HGLLC's property is to accommodate a 115kV transmission line which will not directly conflict with HGLLC's expansion of its generation capabilities at the property.

18. An easement proposed across HGLLC's property is to accommodate a 230kV transmission line – the subject of this Application. As proposed, the 230kV transmission line will directly conflict with HGLLC's development plans.

19. While the exact location of HGLLC's development plan of its Hunterstown facilities is confidential / proprietary, HGLLC believes that only minor adjustments to the proposed transmission line location are needed to accommodate HGLLC's development plans.

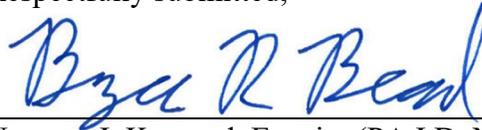
20. As such, the minor adjustments needed to the 230kV transmission line are the basis for HGLLC's immediate and direct interest in this matter, warranting granting this protest *nunc pro tunc*.

21. HGLLC continues to review MAIT's filing and will be identifying other issues to be addressed in this proceeding.

22. 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.

**WHEREFORE**, Hunterstown Generation, LLC respectfully requests that the Commission grant its Protest *Nunc Pro Tunc* 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)  
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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 **Protest** 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