
Garrett P. Lent

glent@postschell.com
717-612-6032 Direct
717-731-1985 Direct Fax
File #: 212097

December 30, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
P.O. Box 3265
Harrisburg, PA 17120

**Re: Application of Mid-Atlantic Interstate Transmission, LLC For the Siting and Construction of the Carroll – Hunterstown 230 kV Transmission Line in Adams County, Pennsylvania
Docket No. A-2025-3056951**

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 December 17, 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
Principal

GPL/sa
Attachments

cc: Jordan Van Order (*via email; w/attachments*)

Application of Mid-Atlantic Interstate Transmission, LLC for the Siting and Construction of the Carroll – Hunterstown 230 kV Transmission Line in Adams County, Pennsylvania

December 30, 2025

QUESTION A-1

Reference the Application, Paragraph 43. Please explain whether MAIT is responsible for the entire \$85,850,000. If not, please provide a breakdown of the cost allocation.

Response:

MAIT is responsible for building the portion of the Project in Pennsylvania of approximately \$85,850,000. As explained in the Direct Testimony of Jacquelyn L. Lojek, the Hunterstown – Carroll Corridor Transmission Lines Rebuild is needed to mitigate violations of FirstEnergy and PJM Planning Criteria that were identified as part of PJM’s Regional Transmission Expansion Plan (“RTEP”) analysis. MAIT and Potomac Edison are obligated under the PJM Operating Agreement to construct, operate, and own transmission facilities as designated by PJM in its annual RTEP process for the Metropolitan Edison and Allegheny Power Zones, respectively. The cost allocation rules for regional projects are set forth in Schedule 12 of the OATT.¹ PJM determines the load-ratio share and distribution factor (“DFAX”) for baseline reliability projects.² This project is cost allocated based on DFAX and PJM has assigned the cost allocation as follows for the components of the Project assigned to the Metropolitan Edison Transmission Zone:

- b3800.10: 100 percent to Metropolitan Edison Transmission Zone
- b3800.11: 100 percent to Metropolitan Edison Transmission Zone
- b3800.12: 100 percent to Metropolitan Edison Transmission Zone
- b3800.14: 99.86 percent to Allegheny Power Transmission Zone and 0.14 percent to Metropolitan Edison Transmission Zone
- b3800.18: 99.86 percent to Allegheny Power Transmission Zone and 0.14 percent to Metropolitan Edison Transmission Zone
- b3800.19: 100 percent to Metropolitan Edison Transmission Zone
- b3800.22: 100 percent to Metropolitan Edison Transmission Zone
- b3800.23: 100 percent to Metropolitan Edison Transmission Zone
- b3800.24: 100 percent to Metropolitan Edison Transmission Zone

Application of Mid-Atlantic Interstate Transmission, LLC for the Siting and Construction of the Carroll – Hunterstown 230 kV Transmission Line in Adams County, Pennsylvania

December 30, 2025

QUESTION A-2

Reference the Application, Exhibit 14. Please provide the results of the required PNDI surveys.

Response:

The PNDI for the Pennsylvania portion of the Carroll-Hunterstown Improvement Project was submitted on September 24, 2024. After coordinating with the four agencies involved in the process, the U.S. Fish and Wildlife Service (USFWS) and Pennsylvania Fish and Boat Commission (PFBC) noted that no further coordination was required. The Pennsylvania Game Commission (PGC) noted the project is located in the range of the tri-colored bat (*Perimyotis subflavus*) but since MAIT will clear trees during the hibernation period (November 15 to March 31), potential impacts will be avoided.

The Pennsylvania Department of Conservation and Natural Resources (DCNR) identified nine plant species of concern that may be within the project area and requested a survey be completed to assess their potential presence. Three surveys were conducted in 2025 at different times (early Spring, early Summer, and Fall) to account for the various flowering windows. Three of the listed species (Kalm's Brome (*Bromus kalmia*), Scribner's Panicgrass (*Dichanthelium oligosanthos*), and Horse-gentian (*Triosteum angustifolium*)), were observed within the project corridor. However, these plants are located in portions of the project area where temporary access roads and work pads can be arranged to avoid impacts. A summary memo of the findings of the survey is in progress and is anticipated to be submitted to DCNR in early 2026. The Company will provide TUS a copy of the summary memo once it is available.

Application of Mid-Atlantic Interstate Transmission, LLC for the Siting and Construction of the Carroll – Hunterstown 230 kV Transmission Line in Adams County, Pennsylvania

December 30, 2025

QUESTION A-3

Reference the Application, Statement No. 5. Please state the minimum conductor to ground clearance at mid span under normal load and average weather conditions.

Response:

The minimum conductor to ground clearance at mid span under normal load and average weather conditions is 30.7 feet for 230 kV conductors, 37.6 feet for 138 kV conductors, and 32.5 feet for 115 kV conductors.

Application of Mid-Atlantic Interstate Transmission, LLC for the Siting and Construction of the Carroll – Hunterstown 230 kV Transmission Line in Adams County, Pennsylvania

December 30, 2025

QUESTION A-4

Reference the Application, Statement No. 5. Please state the minimum conductor to ground clearance at mid span under predicted extreme load and weather conditions.

Response:

The minimum conductor to ground clearance at mid span under predicted extreme load and weather conditions is 29 feet for 230 kV conductors and 26 feet for all 115 kV and 138 kV conductors.

Application of Mid-Atlantic Interstate Transmission, LLC for the Siting and Construction of the Carroll – Hunterstown 230 kV Transmission Line in Adams County, Pennsylvania

December 30, 2025

QUESTION A-5

Reference the Application, Statement No. 5. Please provide the line to structure clearances.

Response:

The minimum clearance from energized conductor under PJM wind blowout conditions (30 degrees Fahrenheit, 4 pounds per square foot wind, 0 inches ice) and Maximum Operating Temperature conditions is 69 inches for 230 kV conductors, 52 inches for 138 kV conductors, and 42 inches for 115 kV conductors.

Application of Mid-Atlantic Interstate Transmission, LLC for the Siting and Construction of the Carroll – Hunterstown 230 kV Transmission Line in Adams County, Pennsylvania

December 30, 2025

QUESTION A-6

Reference the Application, Statement No. 5. Please state the approximate age, condition, and service life of the transmission facilities to be replaced as part of the subject project.

Response:

There are currently four existing circuits that will be impacted by the Carroll – Hunterstown 230 kV construction. These circuits and the existing conditions of the impacted structures are described below:

Carroll – Germantown 138kV 999 Transmission Line: Structures 999-132 to 999-95 will be replaced under the scope of this project, totaling 19 structures. All structures are wood structures and vary between 3 pole wood, 2-pole wood H-frame, and wood mono pole design. The line was originally installed in 1962, and 12 poles and hardware are original to the construction of the line, as well as the conductor and shield wire. The remaining 7 structures have all been replaced since 2013. Structure 99-128_123 was replaced in 2013, however, there are no maintenance records pertaining to the reason it was replaced. Structures 999-110_111, 999-107_108_109, and 999-105_106 were all identified during a 2023 groundline inspection to have extensive shell rot and enclosed pockets and were therefore replaced in 2023. Structure 999-132_133_134 and 999-116_117 were replaced in 2024 following the identification of an enclosed pocket below ground line and extensive shell rot. Structure 999-112_113 was replaced in 2025 following the discovery of extensive shell rot. Currently, there are 3 active repair conditions on this line, all of them for pole top rot on structures installed in 1962.

Germantown – Lincoln 115kV 998 Transmission Line: Structures 998-99 to 998-1_2_3 will be replaced under the scope of this project, totaling 52 structures. There are 51 wood structures varying in design between 3 pole wood, 3-pole wood H-frame, 2-pole wood H-frame, and wood mono pole design. There is one steel mono pole on this line. The line was originally installed in 1962 and 42 of the structures are original to the construction of the line, as well as the conductor and shield wire. The remaining structures have been replaced since 1972. Structures 998-99, 998-98, 998-97 were all installed in 1972, but there are no records pertaining to the reason for its replacement. Structures 998-30A, 998-30B, and 998-30C were all installed in 1998 due to the construction of Straban Substation. Structures 998-94_95_96 and 998-58_59 were installed in 2023 due to cracked poles and failed braces. Structure 998-16_17_18 was replaced in 2025 due to maintenance issues. There are currently no active repair conditions on this line. The 2016 groundline inspection noted that 92% of the poles inspected showed signs of shell rot or decay.

Lincoln – Riley 115 kV Transmission Line: Structures 27 to 11B will be replaced under the scope of this project, totaling 19 structures. All structures are wood structures and vary between 3 pole

Application of Mid-Atlantic Interstate Transmission, LLC for the Siting and Construction of the Carroll – Hunterstown 230 kV Transmission Line in Adams County, Pennsylvania

December 30, 2025

wood H-Frame, 2-pole wood H-frame, and wood mono pole designs. This line is of relatively new construction with installation dates varying between 2008 and 2021. No structures have been replaced due to maintenance. There are no active repair records on this line and there has not been a groundline inspection since the installation.

Hunterstown – Riley 115 kV Transmission Line: Structures 11A to 5 will be replaced under the scope of this project, totaling 12 structures. All structures are wood structures and vary between 3 pole wood H-Frame, 2-pole wood H-frame, and wood mono pole designs. This line is of relatively new construction with installation dates varying between 2016 to 2023. No structures have been replaced due to maintenance. There are no active repair records on this line and there has not been a groundline inspection since the installation.

Application of Mid-Atlantic Interstate Transmission, LLC for the Siting and Construction of the Carroll – Hunterstown 230 kV Transmission Line in Adams County, Pennsylvania

December 30, 2025

QUESTION A-7

Reference the Application, Statement No. 6. Please explain whether Brandon Shores Unit 1 and Unit 2 are still expected to retire.

Response:

Yes, PJM still expects Brandon Shores Units 1 and 2 to deactivate. Pursuant to a FERC-approved settlement, Talen Energy Corporation (Talen), the owner of Brandon Shores Units 1 and 2, agreed to continue to operate the units under a “reliability-must-run” arrangement until the transmission facilities that are needed to mitigate the reliability impact of the units’ deactivation are in place. Once such transmission facilities are in service, PJM’s current understanding is that Talen intends to deactivate the units.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

APPLICATION OF MID-ATLANTIC :
INTERSTATE TRANSMISSION, LLC FOR :
THE SITING AND CONSTRUCTION OF :
THE CARROLL – HUNTERSTOWN 230 : **Docket No. A-2025-3056951**
KV TRANSMISSION LINE IN ADAMS :
COUNTY, PENNSYLVANIA :

VERIFICATION

I, Lisa DeFlumeri, state that I am a Transmission Specialist II for FirstEnergy Service Company; that I am authorized to make this Verification on behalf of Mid-Atlantic Interstate Transmission, LLC (“MAIT”); and that the facts set forth herein are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: December 30, 2025



Lisa DeFlumeri