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File #: 212097

January 20, 2026

***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**

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Dear Secretary Homsher:

Attached for filing is the Answer of Mid-Atlantic Interstate Transmission, LLC (“MAIT”) to the Petition to Intervene of Hunterstown Generation LLC in the above-referenced proceeding.

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

Respectfully submitted,



Garrett P. Lent

GPL/dmc  
Attachment

cc: The Honorable Steven K. Haas (*via email; w/attachment*)  
The Honorable Charece Z. Collins (*via email; w/attachment*)  
Jordan Van Order, Bureau of Technical Utility Services (*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 EMAIL**

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*Counsel for Hunterstown Generation LLC*

Date: January 20, 2026

  
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Garrett P. Lent

**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 :**

**ANSWER OF MID-ATLANTIC INTERSTATE TRANSMISSION, LLC  
TO THE PETITION TO INTERVENE OF HUNTERSTOWN GENERATION LLC**

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**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

Pursuant to Section 5.66 of the Pennsylvania Public Utility Commission’s (“PaPUC” or “Commission”) regulations, 52 Pa. Code 5.66, Mid-Atlantic Interstate Transmission, LLC (“MAIT” or the “Company”) hereby files this Answer to the Petition to Intervene of Hunterstown Generation LLC (“HGLLC”) and Request for Prehearing Conference (“Petition”) which was served upon MAIT on December 29, 2025.

MAIT submits this Answer to the Petition in order to clarify various misstatements and inaccuracies contained in HGLLC’s Petition. In particular, HGLLC’s allegations that the Notice of Filing was deficient and not served on HGLLC warrants response. Petition ¶¶ 7-9. Pursuant to 52 Pa. Code § 57.74(c)(1)(iv), MAIT served a copy of the Notice of Filing associated with the above-captioned application upon all “persons, corporations and other entities designated in § 57.72(c)(4), unless they are served with a copy of the application under § 57.75(i) (relating to hearing and notice)” on August 8, 2025. Prior to service of the Notice of Filing, as well as at the

time of service, the “corporation or other entit[y] of record owning property in the proposed right-of-way” at Tax Parcel ID 38H11-0001 was Kestrel Acquisition LLC. Indeed, even at the time HGLLC filed its Petition and Protest, Kestrel Acquisition LLC remains the owner of record for this parcel based upon the Adams County Tax Parcel records.

In support thereof, MAIT respectfully represents the following:

**I. ANSWER TO PETITION TO INTERVENE**

1. Admitted.
2. Admitted in part and denied in part. It is admitted that the Hunterstown Substation and part of the Carroll–Hunterstown 230 kV Transmission Line are located within existing easements across Tax Parcel ID 38H11-0001, which is approximately 298.91 acres and located in Adams County, Pennsylvania. It is denied that Adams County Tax Parcel records indicate that HGLCC is the owner of record for the property at Tax Parcel ID 38H11-0001.
3. MAIT lacks sufficient information to form a reasonable belief as to the veracity of the allegations contained in Paragraph 3 of the Petition and, therefore, MAIT denies the same.
4. MAIT lacks sufficient information to form a reasonable belief as to the veracity of the allegations contained in Paragraph 4 of the Petition and, therefore, MAIT denies the same.
5. Denied. It is denied that the Proposed Route of the Carroll–Hunterstown 230 kV Transmission Line will impact HGLLC and its potential to expand its generation facilities. By way of further response, the portion of the Proposed Route crossing HGLLC’s property utilizes an existing transmission line right-of-way (“ROW”).
6. Denied as stated. MAIT served a Notice of Filing alongside the above-captioned Application on August 8, 2025.
7. Admitted in part and denied in part. It is admitted that the Notice of Filing was not served on HGLLC. It is denied that the Notice of Filing was “deficient” in any respect. It is also

denied that HGLLC should have been served with a copy of the Notice of Filing. By way of further response, at the time that MAIT began outreach to landowners along the route, i.e., August 2024, the Adams County Tax Parcel records showed that Kestrel Acquisition LLC was the tax owner of record for Tax Parcel ID 38H11-0001; at the time that the Notice of Filing was served, the Adams County Tax Parcel records showed that Kestrel Acquisition LLC was the tax owner of record for Tax Parcel ID 38H11-0001; and, today, the Adams County Tax Parcel records showed that Kestrel Acquisition LLC was the tax owner of record for Tax Parcel ID 38H11-0001. Therefore, MAIT served a copy of the Notice of Filing upon the “corporation or other entit[y] of record owning property in the proposed right-of-way” pursuant to 52 Pa. Code §§ 57.72(c)(4) and 57.74(c)(1)(iv).

8. Admitted in part and denied in part. It is admitted that the Notice of Filing was served upon Kestrel Acquisition LLC. MAIT lacks sufficient information to form a reasonable belief as to the veracity of HGLLC’s allegations regarding its relationship with Kestrel Acquisition LLC and, therefore, denies the same.

9. Denied. It is denied that “HGLLC is unrelated and has no existing relationship with Kestrel Acquisition, LLC” because Paragraph 8, footnote 1 of the Petition states “Upon purchase by LS Power, the name of Pennsylvania entity 6728634 was changed from Kestrel Acquisition, LLC to Hunterstown Generation, LLC.” While MAIT lacks sufficient information to form a reasonable belief as to the veracity of HGLLC’s allegations regarding its relationship with Kestrel Acquisition LLC and, therefore, denies the same, the allegations contained in Paragraph 9 are facially inconsistent with the allegations contained in Paragraph 8.

10. Admitted.

11. Admitted.

12. Denied. It is denied that HGLLC was first provided notice of the Application on December 3, 2025, because proper legal notice of the Application was afforded to the public, including HGLLC, on September 13, 2025. It is further denied that the Notice of Filing was inadequate; by way of further response, MAIT incorporates the information set forth in Paragraphs 6-9, *supra*, as if it were fully stated herein.

13. Paragraph 13 contains information regarding HGLLC's legal representation, to which no responsive pleading is required.

14. Paragraph 14 sets forth legal conclusions as to the Commission's standard for granting intervention, to which no responsive pleading is required. To the extent that a response is required to these legal conclusions, MAIT denies the same.

15. Paragraph 15 sets forth legal conclusions as to whether HGLLC meets the Commission's standard for granting intervention, to which no responsive pleading is required. To the extent that a response is required to these legal conclusions, MAIT denies the same.

By way of further response, MAIT incorporates the information set forth in Paragraph 3-5, *supra*, as if it were fully stated herein. It is also denied that "minor modifications" to the Proposed Route are necessary, reasonable, or warranted in this matter. It is further denied that approval of the Carroll-Hunterstown 230 kV Transmission Line will either "directly harm HGLLC" or "will impact the expansion of critical generation capacity needed in the electricity market today"; MAIT lacks sufficient information to form a reasonable belief as to the veracity of HGLLC's allegations and, therefore, MAIT denies the same and demands strict proof thereof.

16. Admitted in part and denied in part. It is admitted that no other parties intervene in this proceeding. The remainder of the allegations contained in Paragraph 16 are denied.

17. Denied. Paragraph 17 sets forth legal conclusions as to the Commission’s standard for granting intervention, to which no responsive pleading is required. To the extent that a response is required to these legal conclusions, MAIT denies the same. It is specifically denied that HGLLC will be deprived of the beneficial use of its property without modifications to the Proposed Route; by way of further response, MAIT incorporates the information set forth in Paragraph 3-5, *supra*, as if it were fully stated herein.

18. Denied. Paragraph 18 sets forth legal conclusions as to the Commission’s standard for granting intervention, to which no responsive pleading is required. To the extent that a response is required to these legal conclusions, MAIT denies the same. It is specifically denied that “[t]hrough HGLLC’s participation, the Commission will be able to ensure that the expansion of critical generation capabilities are not impacted”; by way of further response, MAIT incorporates the information set forth in Paragraph 15, *supra*, as if it were fully stated herein.

19. Paragraph 19 contains information related to HGLLC’s review of MAIT’s filing, to which no responsive pleading is required. It is specifically denied that HGLLC’s alleged “minor modifications” are necessary or reasonable.

## **II. ANSWER TO REQUEST FOR PREHEARING CONFERENCE**

20. Denied. It is denied that a Prehearing Conference is warranted in this matter. It is also specifically denied that HGLLC has alleged “critical interests which directly impact the Commonwealth’s generation capacity and future expansion of electric generation on HGLLC’s proper”; by way of further response, MAIT incorporates the information set forth in Paragraphs 3-5 and 15, *supra*, as if it were fully stated herein.

21. Paragraph 21 sets forth a request for relief to which no responsive pleading is required. To the extent that a response is required to this request for relief, MAIT denies the same.

**III. CONCLUSION**

**WHEREFORE**, Mid-Atlantic Interstate Transmission, LLC respectfully requests that the Commission accept this Answer to the Petition to Intervene and Request for Prehearing Conference of Hunterstown Generation LLC (“HGLLC”), and deny HGLLC’s request for a Prehearing Conference.

Respectfully submitted,

Tori L. Giesler (ID #207742)  
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Date: January 20, 2025

  
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Attorneys for Mid-Atlantic Interstate  
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**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, Mary Anderson, state that I am a Transmission Siting Supervisor 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: January 20, 2026

*Mary E. Anderson*

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Mary E. Anderson