
Megan E. Rulli

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717-612-6012 Direct
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File #: 214876

March 11, 2026

VIA ELECTRONIC FILING

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

**Re: Letter of Notification of Mid-Atlantic Interstate Transmission, LLC, For Approval of the 115 kV Transmission Line Relocations to Mountain Substation Project in South Middleton Township, Cumberland County, Pennsylvania
Docket No. A-2026-3060793**

Dear Secretary Homsher:

Enclosed please find the responses of Mid-Atlantic Interstate Transmission, LLC (“MAIT”) to the Data Requests issued by the Bureau of Technical Utility Services (“TUS”), Set I, on March 5, 2026, in the above-referenced matter.

Respectfully Submitted,



Megan E. Rulli

MER/tjc
Enclosure

cc: Certificate of Service
Jordan Van Order, Bureau of Technical Utility Services (*via email; jvanorder@pa.gov*)

Bureau of Technical Utility Services – Data Request

Docket No. A-2026-3060793

Letter of Notification of Mid-Atlantic Interstate Transmission, LLC for Approval to Construct the 115 kV Transmission Line Relocations to Mountain Substation Project in Cumberland County, Pennsylvania

March 11, 2026

QUESTION A-1

Reference the Letter of Notification, Certificate of Service. Please provide a certificate of service for NRG.

Response:

NRG Energy, Inc. (“NRG”) was inadvertently omitted from original Certificate of Service. Please see **A-1 Attachment 1** for a copy of the Certificate of Service evidencing service of the Letter of Notification on NRG on March 6, 2026.

A-1 Attachment 1

Garrett P. Lent

glent@postschell.com
717-612-6032 Direct
717-731-1985 Direct Fax
File #: 217030

March 6, 2026

VIA ELECTRONIC FILING

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

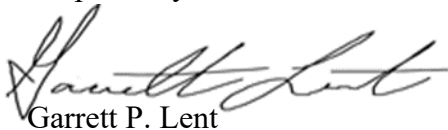
**Re: Letter of Notification of Mid-Atlantic Interstate Transmission, LLC, For Approval
of the 115 kV Transmission Line Relocations to Mountain Substation Project in
South Middleton Township, Cumberland County, Pennsylvania
Docket No. A-2026-3060793**

Dear Secretary Homsher:

Enclosed for filing on behalf of Mid-Atlantic Interstate Transmission, LLC (“MAIT” or “Company”) please find a copy of the Letter of Notification for the above referenced proceeding, which was served today via First Class Mail on the entity indicated in the attached Certificate of Service. MAIT is supplementing its original service to complete service of the Notice of Filing on all known persons, corporations and entities of record owning property within the proposed right-of-way, pursuant to 52 Pa. Code § 57.72(c)(1)(iv).

If you have any questions pertaining to this matter, please do not hesitate to contact me.

Respectfully submitted,



Garrett P. Lent
Principal

GPL/sa
Enclosure

cc: Certificate of Service

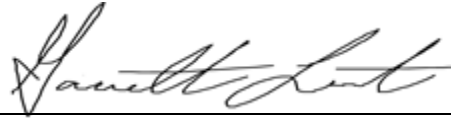
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Letter of Notification has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 57.72(d)(3).

VIA CERTIFIED MAIL: RETURN RECEIPT REQUESTED

NRG Energy, Inc.
NRG Tower
1301 McKinney Street
Houston, TX 77010

Date: March 6, 2026



Garrett P. Lent

Bureau of Technical Utility Services – Data Request

Docket No. A-2026-3060793

Letter of Notification of Mid-Atlantic Interstate Transmission, LLC for Approval to Construct the 115 kV Transmission Line Relocations to Mountain Substation Project in Cumberland County, Pennsylvania

March 11, 2026

QUESTION A-2

Reference the Letter of Notification, Paragraph 13. Please state the age and describe the condition of the existing 115 kV portion of the Mountain Substation.

Response:

Please see the table below for list of assets associated with 115 kV portion of Mountain Substation.

Equipment	Remain or Replace	Approximate Age as of 2026 (years)	Expected Service Life (years)	Condition	Notes
Breaker B98212	Remain	13	30 - 40	Typical for given age	
Breaker B97412	Remain	13	31 - 40	Typical for given age	
Electromechanical Relays	Replace	46 - 64	40	Obsolete	
Microprocessor Relays	Replace	7 - 13	20	Typical for given age	
Carrier Communications	Replace	7 - 8	25	Typical for given age	
Metering	Replace	7 - 8	20	Typical for given age	
Station Battery	Replace	18	20 - 25	Nearing EOL	
Station Charger	Replace	4	20 - 25	Typical for given age	
Switches	Replace	7 - 13	30 - 40	Typical for given age	
Foundations	Replace	Up to 60 years old	60	Typical for given age	These were installed as the station was built and expanded
Steel Structures	Replace	Up to 60 years old	60	Typical for given age	These were installed as the station was built and expanded

Bureau of Technical Utility Services – Data Request

Docket No. A-2026-3060793

Letter of Notification of Mid-Atlantic Interstate Transmission, LLC for Approval to Construct the 115 kV Transmission Line Relocations to Mountain Substation Project in Cumberland County, Pennsylvania

March 11, 2026

QUESTION A-3

Reference the Letter of Notification, Paragraph 44. Please explain whether NRG is responsible for any portion of the subject project cost. If not, please provide a detailed explanation as to why.

Response:

NRG is not responsible for any portion of the costs associated with this Project. The re-termination of the NRG Mountain-Mountain CT 115 kV transmission line is necessary due to the proposed ring-bus configuration of the Mountain Substation as proposed by MAIT as part of this Project and not due to any requests or requirements of NRG. Therefore, NRG has no cost responsibility for this Project.

Bureau of Technical Utility Services – Data Request

Docket No. A-2026-3060793

Letter of Notification of Mid-Atlantic Interstate Transmission, LLC for Approval to Construct the 115 kV Transmission Line Relocations to Mountain Substation Project in Cumberland County, Pennsylvania

March 11, 2026

QUESTION A-4

Reference the Letter of Notification, Paragraph 44. Please state the age and anticipated service life and describe the overall health of the substation facilities to be replaced.

Response:

See the table included in the response to Question A-2. As indicated in the table, nearly all of the 115 kV portion of the Mountain Substation will be replaced as part of this Project, with the exception of the two breakers.

Bureau of Technical Utility Services – Data Request

Docket No. A-2026-3060793

Letter of Notification of Mid-Atlantic Interstate Transmission, LLC for Approval to Construct the 115 kV Transmission Line Relocations to Mountain Substation Project in Cumberland County, Pennsylvania

March 11, 2026

QUESTION A-5

Reference the Letter of Notification, Paragraph 44. Please provide a detailed breakdown of the substation costs.

Response:

The substation cost includes approximately \$4,960,000 in engineering, \$5,329,000 in materials and approximately \$11,711,000 in construction for a total of approximately \$22,000,000 as referenced in the footnote of the Letter of Notification, Paragraph 44.

Bureau of Technical Utility Services – Data Request

Docket No. A-2026-3060793

Letter of Notification of Mid-Atlantic Interstate Transmission, LLC for Approval to Construct the 115 kV Transmission Line Relocations to Mountain Substation Project in Cumberland County, Pennsylvania

March 11, 2026

QUESTION A-6

Reference the Letter of Notification, Paragraph 58. Please state the age and anticipated service life and describe the overall health of the transmission line facilities to be replaced.

Response:

There are two structures that will be replaced for this project: Structure #982-1 of the Mountain–PPGI 115 kV Transmission Line and Structure #974-133_134 of the Gardners–Mountain 115 kV Transmission Line.

Structure #982-1 of the Mountain–PPGI 115 kV Transmission Line is a direct embedded, guyed, wood mono pole that was installed in 1971. There are currently no active repair conditions on this structure. During a 2021 groundline inspection, it was noted that the structure had the beginning stages of shell rot.

Structure #974-133_134 is a 2-pole wood H-frame structure that was installed in 1965. There are currently no active repair conditions on this structure. In 2024, woodpecker holes were found on the southern pole, which were repaired by cutting and capping the pole in 2025. During a 2025 groundline inspection, there were no conditions noted on this structure.

While the overall maintenance condition of this line is not the driver for the structure replacements, MAIT uses FirstEnergy’s EtF Methodology to review and assess existing transmission facilities for equipment characteristics that are near or beyond their existing service life, contain components that are obsolete, or pose reliability risks to the system. To determine whether lines should be rehabilitated, rebuilt, or replaced based on their age, performance, system criticality, risk and condition-based assessment, the following global characteristics may be considered:

Customer/Contingency Risk.

- Negative impact on equipment health and/or system reliability.
- Customer outage frequency and/or durations.
- Increasing negative trend in maintenance findings and/or costs.
- Failure risk, to the extent caused by asset design characteristics, or historical industry/company performance data.
- Operation, design, or installation limitations.
- Age/condition of wood pole transmission line structures typically replacement is considered beginning at 40 years of average age for a line segment.
- Must pass a hammer sound test.

Bureau of Technical Utility Services – Data Request

Docket No. A-2026-3060793

Letter of Notification of Mid-Atlantic Interstate Transmission, LLC for Approval to Construct the 115 kV Transmission Line Relocations to Mountain Substation Project in Cumberland County, Pennsylvania

March 11, 2026

- Age/condition of steel tower or steel pole transmission line structures typically replacement is considered beginning at 60 years of average age for a line segment.
- Age/condition of transmission line conductors and hardware typically replacement is considered beginning at 40 years of average age for a line segment.
- System characteristics, including lightning and grounding performance, galloping overlap, insulation coordination, structural capacity needs, and future needs (*e.g.*, fiber path).
- Current design criteria, applicable codes, and industry best practices.
- Environmental factors.
- Lack of resiliency or system-hardening attributes.

When evaluating the replacement of in-service transmission line assets, the review may also consider maintenance operating experience, manufacturer and accepted industry practices, and current engineering design standards.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LETTER OF NOTIFICATION OF MID- :
ATLANTIC INTERSTATE :
TRANSMISSION, LLC FOR APPROVAL :
OF THE 115 KILOVOLT TRANSMISSION : **Docket No. A-2026-3060793**
LINE RELOCATIONS TO MOUNTAIN :
SUBSTATION PROJECT IN SOUTH :
MIDDLETON TOWNSHIP, :
CUMBERLAND COUNTY, :
PENNSYLVANIA :

VERIFICATION

I, Thomas R. Ladson, 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 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: March 11, 2026



Thomas R. Ladson