

**BEFORE THE
PENNSYLVANIA UTILITY COMMISSION**

Application of NextEra Energy Transmission :
MidAtlantic, Inc., filed pursuant to 52 Pa. Code :
Chapter 57 Subchapter G, for approval to site : Docket No. A-2026-3060856
and construct a 500 kV transmission line :
associated with the MidAtlantic Resiliency Link :
Project located in portions of Greene County :
and Fayette County, Pennsylvania :

Application of NextEra Energy Transmission :
MidAtlantic, Inc., for All the Necessary :
Authority, Approvals, and Certificates of Public : Docket No. A-2026-3060921
Convenience (1) to Begin to Furnish and Supply :
Electric Transmission Service in Greene County :
and Fayette County, Pennsylvania; :
(2) for Certain Affiliated Interest Agreements; :
and (3) for any Other Approvals Necessary to :
Complete the Contemplated Transactions :

PROTEST OF THE COUNTY OF FAYETTE

Before the Pennsylvania Public Utility Commission (Commission), pursuant to 52 Pa. Code Sections 5.51, *et seq.*, the County of Fayette (County) files this Protest to the above-captioned Application(s). In support of this Protest, the County of Fayette avers as follows:

I. NAME AND CONTACT INFORMATION OF THE PROTESTANT.

County of Fayette
61 East Main Street
Uniontown, PA 15401

II. NAME AND CONTACT INFORMATION OF PROTESTANT'S ATTORNEY.

John M. Purcell, Esquire
55 East Church Street, Suite 101
Uniontown, PA 15401
(Chief County Solicitor)

III. STATEMENT OF INTEREST.

The County is a political subdivision of the Commonwealth of Pennsylvania, charged with protecting the health, safety, and welfare of its residents. The proposed transmission line could traverse multiple municipalities within the County, directly affecting:

- County-owned lands and infrastructure
- Local roadways and rights-of-way
- Residential communities and agricultural areas
- Environmentally sensitive lands and natural resources
- The Sheepskin Trail, a recreational bike/hike trail in the area owned by the County

Accordingly, the County has a direct and substantial interest in the outcome of this proceeding.

IV. GROUNDS FOR PROTEST.

The County raises the following concerns regarding the Application:

A. Land Use and Local Planning Impacts

The proposed route appears inconsistent with existing county and municipal comprehensive plans, zoning designations, and long-term land use priorities. The County is concerned that the project may undermine coordinated planning efforts and impose incompatible uses on affected communities and areas.

B. Environmental Concerns

The County is concerned about potential adverse impacts to:

- Westlands, streams and watershed areas
- Forested lands and wildlife habitats
- Agricultural preservation areas

The Application does not adequately demonstrate avoidance, minimization, or mitigation of these impacts.

C. Public Health and Safety

Construction and operation of the transmission line may pose risks related to:

- Proximity to residences, schools and public facilities
- Emergency access limitations
- Potential hazards associated with high-voltage infrastructure

The County requests further evaluation of these risks.

D. Infrastructure and Roadways Impacts

Construction activities may significantly affect State and municipal roadways, including:

- Increased heavy truck traffic
- Road degradation and maintenance burdens
- Disruptions to local transportation networks

The Application lacks sufficient detail regarding coordination with local governments and restoration obligations.

E. Community and Economic Impacts

The County is concerned about potential negative effects on:

- Property values
- Tourism and scenic resources
- Agricultural operations
- The Sheepskin Trail, a recreational bike/hike trail in the area

These impacts have not been fully assessed or addressed.

F. A public statement from the Fayette County Commissioners further detailing their position is attached as Exhibit "A" and incorporated by reference.

V. SERVICE ON PROTESTANT.

For the purposes of receiving communications from the Commission and from the parties to this proceeding regarding the Protest, the County of Fayette agrees to use a Commission eFiling account and receive eService at: *jackpurcell146@gmail.com*.

VI. REQUEST FOR RELIEF.

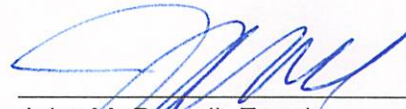
WHEREFORE, the County of Fayette respectfully requests that the Public Utility Commission:

1. Carefully review the concerns raised herein;
2. Require the Applicant to provide additional analysis, justification, and mitigation measures;
3. Consider alternative routes that minimize impacts to the County and its residents' and,
4. Grant such other relief as the Commission deems just and proper, including denial or modification of the Application if warranted.

VII. CONCLUSION.

The County appreciates the opportunity to submit this Protest and urges the Commission to give full consideration to the local impacts identified above in evaluating the proposed transmission project.

Respectfully submitted,



John M. Purcell, Esquire
Chief County Solicitor for the
County of Fayette
55 East Church Street, Suite 101
Uniontown, PA 15401
(724) 437-2711
jackpurcell146@gmail.com

Date

4/23/2020

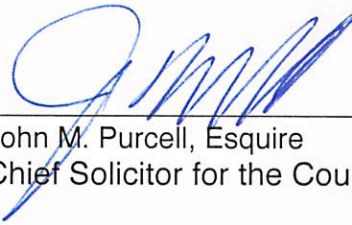
VERIFICATION

Pursuant to 52 Pa. Code Section 1.36, I, John M. Purcell, Esquire, Chief Solicitor for the County of Fayette, hereby state that the facts above 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

4/23/2026

John M. Purcell, Esquire
Chief Solicitor for the County of Fayette



CERTIFICATE OF SERVICE

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the foregoing Protest upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the hammer and upon the persons listed below.

John M. Coogan, Administrative Law Judge
Office the Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
jcoogan@pa.gov

Garrett P. Lent, Esquire
David V. MacGregor, Esquire
Hayley E. Wilburn, Esquire
Post and Schell
17 North 2nd Street, 12th Floor
Harrisburg, PA 17101
glent@postschell.com
dmacgregor@postschell.com
hwilburn@postschell.com
hwilburn@postschell.com
Counsel for NextEra Energy Transmission

Nazaarah Sabree, Esquire
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101
ra-sba@pa.gov
Small Business Advocate

Tracy C. Davis, Esquire
NextEra Energy Transmission
5920 West William Cannon Drive, Bldg. 2
Austin, TX 78749
tracy.c.davis@nexteraenergy.com
Counsel for NextEra Energy Transmission


Jacob D. Guthrie, Esquire
Josiah B. Harmar, Esquire
Melanie Joy El Atieh, Esquire
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101
OCAMARL2026@paoca.org
Office of Consumer Advocate

Anna Galanis, Esquire
NextEra Energy Transmission
700 Universe Blvd.
Juno Beach, CA 33408
anna.galanis@nexteraenergy.com
Counsel for NextEra Energy Transmission

Allison C. Kaster, Esquire
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
akaster@pa.gov
Director of I&E

4/23/2024

Date



John M. Purcell, Esquire
Chief County Solicitor for the
County of Fayette

FAYETTE COUNTY, PENNSYLVANIA

OFFICE OF
COUNTY COMMISSIONERS



Scott Dunn - Chairman
Vincent A. Vicites - Vice Chairman
Harry Dutch Kaufman - Secretary

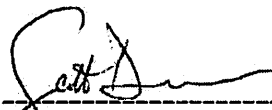
STATEMENT OF THE FAYETTE COUNTY COMMISSIONERS IN OPPOSITION TO THE MARL TRANSMISSION LINE PROPOSED PROJECT

The Fayette County Commissioners have a long history of supporting energy-producing projects and activities in the County. For example, the Commissioners strongly supported the development of natural gas in the County through fracking as long as adequate safeguards were in place to ensure the health and welfare of County residents. In addition, the Commissioners supported Solar development as long as it occurred in appropriate locations and with the necessary conditions, such as reasonable setbacks. Further, the Commissioners have always strongly supported the coal mining industry in the area and continue to do so, believing it has a place in meeting the energy needs of the nation.

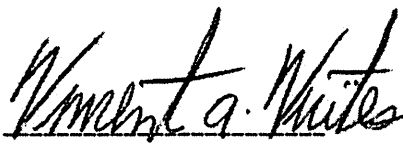
Recently, the Commissioners became aware of a proposed gas-fired electric power plant that could be constructed in Southwestern Pennsylvania along the Monongahela River. The Commissioners fully support this proposed project and would be willing to take all reasonable actions needed to have this plant constructed in Fayette County.

However, at the request of several County residents, the Commissioners have been reviewing the application of NextEra Energy Transmission MidAtlantic, Inc, to construct an electrical transmission line in the southern portion of the County as part of the MidAtlantic Resiliency Link Project. After careful consideration, the Commissioners have decided to oppose this application. The Commissioners believe that the proposed project will have an excessively negative impact on farmland and on scenic areas in the County. Although energy development is a priority in the County, agriculture and tourism must also be preserved. In this instance, the negative effects of the proposed project outweigh any benefits to the County.

Therefore, as currently proposed, the Fayette County Commissioners' official position is to oppose this project.



Scott Dunn
Chairman

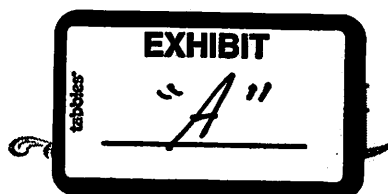


Vincent A. Vicites
Vice Chairman



Harry Dutch Kaufman
Secretary

Fayette County Courthouse
61 East Main Street
Uniontown, PA 15401



724.430.1200
f. 724.430.1265
fayettecountypa.org