

PETITION TO INTERVENE

BEFORE THE PENNSYLVANIA PUBLIC 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 of 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 :

DATE OF DEPOSIT

APR 29 2026

PA Public Utility Commission
Secretary's Bureau

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Before the Pennsylvania Public Utility Commission (Commission), pursuant to 52 Pa. Code Sections 5.71 through 5.74, [Print Name of Petitioner] Kathy Rishel hereby files this Petition to Intervene in the above-captioned Application(s). In support thereof, [Print Name of Petitioner] Kathy Rishel states as follows:

1. Name and contact information of the Petitioner. [Provide name and address of Petitioner.]

Kathy Rishel
2810 Dimer Bell Five Forks Road Farmington PA 15437

2. Name and contact information of Petitioner's attorney. [Provide names and addresses of Petitioner's attorneys. If none, clearly state "No attorney representation."]

No attorney

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Per **52 Pa. Code § 5.52(a)(1)**, I am writing as a rate payer and land owner that can be directly impacted by the MARL project filed routes to formally outline a list of reasons why the MARL line should not be approved by the PA PUC. Specifically, the following points highlight why this project is not in the best interest of Pennsylvania (PA), PA's ratepayers, and myself in accordance with **the grounds of the proposed intervention per 52 Pa. Code § 5.52(a)(2) and the facts establishing the grounds to intervene in the Applications per 52 Pa. Code § 5.52(a)(3)**. This outline will concisely bring facts that support that the MARL line is not **Use or Useful to PA ratepayers**, and that the MARL line is **Unjust and Unreasonable to PA ratepayers**, and that PJM's Project needs further review:

1. **Not the Least Cost Solution:** Building generation near where the load is needed, or building load where generation has available capacity, is a more cost-effective option than this MARL project.
2. **Lack of Long-term Benefit:** It does not benefit PA for the long term. If there is generation capacity and transmission assets readily available in PA, then the focus should be on bringing long-term, high-paying jobs and economic growth to PA. Currently the PA MARL route areas depend on tourism, hunting, and farming.
3. **Economic and Aesthetic Harm:** This project marks the beginning of a negative and expensive transmission line expansion trend that will riddle PA with transmission lines, harming the viewshed for tourism without providing significant, long-term local jobs or economic growth. PA tourism and people enjoying PA's rural areas and trails are the main basis of the local SWPA economy. The MARL line can and will negatively impact our tourism, hunting, and farming economy without bringing long term benefit.
4. **Reliability Concerns:** Claims regarding PA's grid reliability have been exaggerated to represent PJM as a whole when it is in fact the PJM zones outside of PA that have a power need that was hurt by PJM's approval of generator retirements and other PJM state's energy policies to force generation offline. This does not sound like those states are being a good steward within the PJM region. Furthermore, increased transmission line connectivity to Virginia makes it more likely that PA could face load shedding emergency actions to meet the needs of states with unsustainable energy policies since the MARL project will create a new "transmission highway" to carry the load from other states, to other states, thru PA. Load shedding should be done at the site of the event to control transmission issues, rather than impacting states like PA that have maintained reliable generation that is consistently exported to PJM's energy deficient states. Currently, load shedding PA to keep Virginia powered is not an option due to the transmission bottleneck of the Hatfield-Black Oak line's rated capacity limits. MARL will be the beginning of opening up the possibility of impacting PA's electric reliability that does not exist today. This load shed development is a big concern when one Googles the PJM emergency actions over the past year.
5. **Flow of Energy:** Since energy flows from source (generation) to sink (load need), MARL will primarily pull power from both PA and from non PA states, located to PA's west, rather than help PA. Thus, this alleged MARL line benefit that "energy can flow to the MARL PA area to help us" was over-stated as a half-truth reliability benefit that applies to PJM zones outside of PA, primarily the Dominion (Virginia) Zone. MARL cannot, by the

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laws of physics and the current mind boggling lack of reliable generation in Virginia that was once present, flow power from MARL's eastern proposed point in Virginia to PA. Plus, if the MARL line is approved and built, there will be less reason for generation to site, re-site, or restart in or near Virginia, which will increase the other PJM zone rate payers' market and congestion costs, which includes the PJM allocated PA rate payers' costs of energy losses over distance, construction, maintenance, and operating costs.

6. **Energy Losses Over Distance:** Energy is lost over distance and that energy loss cost is allocated to the rate payers. The more transmission lines that are built and/or the longer that these transmission lines are, the more that these losses will add up and be passed into customer's bills. The grid would not need to be expanded in long miles today if the individual utility areas or zones were managed for reliability, N-2 contingencies, and proper reserve margin. The answer is add or restart reliable generation to ensure the grid is safe, reliable, just and reasonable, and use and useful at the least cost to the electric rate payer.
7. **Unfair Cost Allocation:** PJM's cost allocation and transmission planning are unjust and unreasonable to PA ratepayers and contrary to 18 CFR 35 and the PJM tariff, causing unfair congestion and higher market rates that are passed to the PA rate payers. This not only includes the market based rates, but also the rate payer cost allocations of line projects like MARL to build, maintain, and the energy losses over distance.
8. **Impact on Landowners:** The project will island homes and properties, negatively impacting landowners both physically and monetarily. Would you want a 500 kV line on both sides of your home?
9. **Lack of State Alignment within the PJM region:** Based on the rate payer's increasing power bills and the Pennsylvania Office of Consumer Advocate (OCA)'s late learning of the MARL project, there seems to be a lack of engagement from PJM with states to align the transmission process and minimize rate increases. Specifically, PJM "must be responsible for planning, and for directing or arranging, necessary transmission expansions, additions, and upgrades that will enable it to provide efficient, reliable and non-discriminatory transmission service and coordinate such efforts with the appropriate state authorities."¹ States with different energy policies should be responsible for the impacts of those policies rather than negatively affecting generation capacity surplus and energy producing responsible PJM states like PA. PJM manages parts of their transmission process by PJM Zones. When PJM was a smaller entity, representing fewer states and utilities, that PJM overall and zonal approach may have been more effective. However, now that PJM consists of many more states and has approved many PJM generator retirements without replacements, PJM may need to adjust their tariff administration to assess the reliability of the PJM zones to better align with the PJM state energy policies, PJM's cost allocation methodology, and PJM's 18 CFR 35 and PJM tariff requirements to manage congestion and grid reliability.
10. **Energy Loss Costs:** Wheeling Power across long transmission lines across PJM's large area leads to higher costs due to energy losses and congestion, which are passed on to all PJM jurisdictional ratepayers. The least cost solution at this point of the energy

¹ eCFR :: 18 CFR Part 35 Subpart F -- Procedures and Requirements Regarding Regional Transmission Organizations, (k) *Required functions of a Regional Transmission Organization, (7) Planning and expansion.*

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revolution is never long transmission lines, but generation connections near the load need and revamping the existing transmission lines by material selections and our technologies like converting the power to Direct Current (DC) to place any newly required lines as DC lines within the existing transmission right of ways and then reconverting the energy back to Alternating Current (AC) at the point of need.

11. **Environmental Impact:** The environmental impacts of clear cutting forest and disturbing the habitat are well known. Thus, we will focus on alternatives to any transmission line like MARL. The bring your own generator (BYOG) model is an excellent model to reduce the need for long transmission lines. BYOG keeps the large energy swings of the large datacenter users behind the point of interconnection (POI), which will protect the overall grid's reliability without the grid needing additional equipment installed at the rate payer's expense. These large data swings are a grid reliability concern to NERC² and the rate payers who are learning about large load impacts, especially since a large enough load swing can trip protective devices or cause unmanageable electrical harmonics and leave the ratepayers in the dark. Ideally, the large load datacenters would BYOG through the utilization of their waste heat. Specifically, in Europe, "[u]nlike conventional geothermal plants that are limited to volcanic and tectonic-plate-boundary regions (such as Iceland), EGS involves drilling up to eight kilometres deep into hot, solid rock, injecting fluid into the cracks, then pumping the heated fluid back up to generate electricity."³ Thus, the headline "Geothermal energy could replace 42% of EU's fossil electricity", is a real eyecatcher to not only states that seek reliable renewable energy sources, but should also catch the eye of those large load customers who have high amounts of waste heat that can be captured and not lost as waste to the atmosphere or the ground water. Now BYOG as a geothermal and waste heat recovery generator would help make the data centers become more of a benefit to communities than a burden, with no sounds of cooling fan hums, no waste of energy, no need for additional long transmission lines. Shell and tube heat exchangers are very quiet pieces of equipment to operate with pumps. Thus, BYOG as geothermal waste heat recovery units wins for all, including the environment.
12. **Congestion Costs:** Based on the climbing ratepayer bills and the amount of PJM emergency actions, something isn't right and that something is being passed to the ratepayers within PJM's region. PJM has an 18 CFR 35 responsibility to "...ensure the development and operation of market mechanisms to manage transmission congestion. As part of its demonstration with respect to congestion management, the Regional Transmission Organization must satisfy the standards listed in paragraph (k)(2)(i) of this section, or demonstrate that an alternative proposal is consistent with or superior to satisfying such standards."⁴ The quickly increasing power bills are the effect felt by ratepayers, but the PJM self inflicted generator retirements is a cause that is being compounded exponentially by projected datacenter load growth.

² From NERC's website: [White Paper Characteristics and Risks of Emerging Large Loads](#)

³ [Geothermal energy could replace 42% of EU's fossil electricity. Which nation has the most potential? | Euronews](#)

⁴ eCFR :: 18 CFR Part 35 Subpart F -- Procedures and Requirements Regarding Regional Transmission Organizations, (k) **Required functions of a Regional Transmission Organization, (2) Congestion management.**

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13. **Premature PJM Generator Retirement Approval:** It is disappointing to see PJM approve generator closures before retired capacity could be replaced with existing transmission assets to serve needed load capacity, especially in the areas that PJM is trying to serve with the MARL line project. Those generators were placed there with the transmission assets to disperse each generator's load for a reason, for a reason before PJM took control over them. Sure, if big steel mills shutter, those local plants could possibly shutter too. However, it feels like something was missed by PJM that has caused a PJM self-created load need and transmission congestion in Virginia that is over and above the datacenter boom. If generators want to retire, so be it, but before they do, PJM needs to have a retirement condition to have reliable replacement generation, not intermittent generation, near that transmission asset location to maintain those existing transmission assets as use and useful. PJM did not.
14. **Lack of Transparency:** Projects like MARL could be avoided if PJM maintained a heat map to show customers the least-cost transmission areas to utilize the existing system effectively. In addition, not all land owners in the MARL study area were sent the initial project notification or the second public project sessions notification, when those landowner properties were within a mile or two of the initial project routes. This travesty was realized through local community initiated forums. As of this letter, the community rate payers are still just learning about the MARL project at this late hour. This is unacceptable. And finally, most PA residents were unaware of the MARL project until 2025 but found PJM documentation from 2022. There needs to be a mechanism, i.e. electric bill notification, an automatic call, a certified letter, etc. that provides potential project transparency at the time of identified electric need to potential and unknowing stakeholders in the PJM process (i.e. landowners and rate payers) to alert unknowing stakeholders so that the most just and reasonable and use and useful outcome prevails for all parties.
15. **Inefficient Infrastructure:** MARL will essentially be an expensive "extension cord" to funnel power from states west of PA to the east and southeast of PA, neither of which is for PA's long term benefit. It is unjust and unreasonable for PA to pay for the construction and maintenance of assets that are not the least-cost solution for the MARL project's stated needs, let alone the burden and the adverse impacts to their land and livelihoods. PJM has a generation problem, not a transmission problem, which has also been mentioned by former FERC Commissioner Mark Christie.

I am requesting that the PA PUC grants this Petition to Intervene in the Applications and respectfully requests that the Public Utility Commission not approve the MARL Project and associated MARL applications as the best possible outcome for PA. Thank you for your attention to these concerns regarding the MARL project.

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6. Service on Petitioner

For the purposes of receiving communications from the Commission and from the parties to this proceeding regarding the intervention, if the intervention is granted, [Print Name of Petitioner]_____

Kathy Rishel agrees to (check one):

Open and use a Commission eFiling account and receive eService

Receive all documents by email at: [email]_____

** Petitioner acknowledges documents cannot be filed via email.

Receive all documents by First Class Mail at the above-listed address

7. Verification and Signature

Pursuant to 52 Pa. Code Section 1.36, I, [Print Name of Petitioner] Kathy Rishel _____ hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief, and that I expect 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 unsworn falsification to authorities).

Kathy Rishel _____

Signature

4-28-26 _____

Date

9. Signature and Date

Respectfully submitted,

Kathy Rishel _____
[Signature of Petitioner]

Kathy Rishel _____
[Print Name of Petitioner]

4-28-26 _____

Dated: [Insert Month Day, Year]

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CERTIFICATE OF SERVICE

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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 Petition to Intervene 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 manner and upon the persons listed below.

Dated: [Insert Month Day, Year] 4-28-26 DATE OF DEPOSIT

SERVICE BY E-MAIL

APR 29 2026

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[Signature of Petitioner]



[Print Name of Petitioner]