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File #: 205388

June 12, 2026

VIA ELECTRONIC FILING

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

Re: Application of NextEra Energy Transmission MidAtlantic, Inc., for All of the Necessary Authority, Approvals, and Certificates of Public 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 Docket No. A-2026-3060921 et. al.

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

Dear Secretary Homsher:

Enclosed for filing please find the Answer of NextEra Energy Transmission MidAtlantic, Inc. to the Petition to Intervene of Charity Grimm Krupa in the above-referenced proceedings.

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

Respectfully submitted,



Garrett P. Lent

Matthew L. Homsher, Secretary
June 12, 2026
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GPL/bfc
Enclosure

cc: Certificate of Service

CERTIFICATE OF SERVICE

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

ACTIVE PARTIES OF RECORD **SERVICE BY EMAIL ONLY**

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VIA EMAIL AND FIRST-CLASS MAIL

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Dated: June 12, 2026

A handwritten signature in cursive script, appearing to read "Garrett P. Lent", is written above a horizontal line.

Garrett P. Lent

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of NextEra Energy : Docket Nos. A-2026-3060921
Transmission MidAtlantic, Inc., for All of : G-2026-3060941
the Necessary Authority, Approvals, and : G-2026-3060942
Certificates of Public 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 :

Application of NextEra Energy : Docket No. A-2026-3060856
Transmission MidAtlantic, Inc., Filed :
Pursuant to 52 Pa. Code Chapter 5 :
Subchapter G, for Approval to Site and :
Construct a 500 kV Transmission Line :
Associated with the MidAtlantic :
Resiliency Link Project Located in :
Portions of Greene County and Fayette :
County, Pennsylvania :

**ANSWER OF NEXTERA ENERGY TRANSMISSION MIDATLANTIC, INC. TO THE
PETITION TO INTERVENE OF CHARITY GRIMM KRUPA**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

I. INTRODUCTION AND OVERVIEW

Pursuant to 52 Pa. Code § 5.66, NextEra Energy Transmission MidAtlantic, Inc. (“NEET MA” or the “Company”) hereby submits this Answer to the Petition to Intervene (the “Petition”) of Charity Grimm Krupa (“Petitioner”) in the above-captioned proceedings.

On March 3, 2026, NEET MA filed, pursuant to the Pennsylvania Public Utility Code at 66 Pa.C.S. §§ 1101, 1103, and 2102, an application requesting all necessary authority, approvals,

and certificates of public convenience from the Pennsylvania Public Utility Commission (“Commission”) necessary to authorize NEET MA to begin to furnish and supply electric transmission service as a Pennsylvania public utility within Greene County and Fayette County, Pennsylvania (“CPC Application”).

Also on March 3, 2026, NEET MA filed, pursuant to 52 Pa. Code § 57.72, an application requesting Commission approval of the siting and construction of the Pennsylvania Portion of a new 500 kV transmission line associated with the MARL Project in Dunkard Township in Greene County and Springhill Township in Fayette County, Pennsylvania (“Siting Application”).

On March 26, 2026, Administrative Law Judge John M. Coogan issued a Prehearing Conference Order providing, among other things, that a Telephonic Prehearing Conference would be held on Wednesday, May 6, 2026 at 10:00 AM for both the CPC Application and Siting Application proceedings. At the May 6 prehearing conference, Administrative Law Judges John M. Coogan and Erin L. Gannon (the “ALJs”) consolidated the CPC Application and the Siting Application.¹ The ALJs also decided that, for any protests and/or petitions to intervene filed on or before May 29, 2026, NEET MA would be permitted to respond on or before June 12, 2026.² Numerous protests and petitions to intervene have been filed at the above-captioned dockets before and since the May 6 prehearing conference.

On May 1, 2026, the Petition filed by Charity Grimm Krupa was posted to one or both of the above-captioned dockets in this proceeding. As explained below, NEET MA opposes the Petition because the Petitioner has no legally recognizable interest in the above-captioned proceedings and, therefore, cannot meet the eligibility criteria set forth in the Commission’s regulations at 52 Pa. Code § 5.72.

¹ Tr. 11.

² Tr. 47-48.

The Petitioner's only interest in the above-captioned proceedings is general, and essentially seeks compliance with the Pennsylvania Public Utility Code and with the Commission's regulations and orders. The Petition raises general concerns related to need, rate impacts, reliability, health and safety, impact to land, environment, and property, economic benefit, evaluation of alternatives, and notice. However, a general concern that the above-listed elements of the proceedings be investigated and duly considered does not establish that the Petitioner themselves will suffer an injury that is substantial. This Petition is thus insufficient for the purposes of establishing that the Petitioner has an interest in the proceedings that will not be "adequately represented by existing participants." 52 Pa. Code § 5.72. Rather, the Petition alleges general interests and harms that do not surpass the common interest of all citizens in procuring obedience to the law.

In any event, the interests of residential ratepayers, like the Petitioner, are adequately represented by the Office of Consumer Advocate ("OCA"), who is actively participating in this proceeding. OCA is empowered and obligated to represent general residential and consumer interests like those advanced by the Petitioner. The Petitioner has not alleged a specific interest in addition to the general interests that OCA is actively representing.

The Petitioner also attempts to bring her concerns on behalf of her constituents, in her position as a Member of the Pennsylvania House of Representatives. The Pennsylvania Commonwealth Court has held that a legislator's desire to advocate for their constituents is not a sufficient basis on which to confer legislative standing in a proceeding. *Sunoco Pipeline L.P. v. Dinniman*, 217 A.2d 1283, 1292 (Pa. Cmwlth. 2019). Thus, the Petitioner's position as a legislator is an insufficient basis upon which to confer standing.

Finally, Company records indicate that the Petitioner does not own property located within the right-of-way (“ROW”) corridor for the Proposed Route, nor does the Petitioner own property located within the ROW corridors for any of the Alternate Routes of the MARL Project. Yet, the Petition fails to establish the manner in which the MARL Project will directly affect the Petitioner such that their interest will not be adequately represented by existing participants, as they are not a landowner of property that will be traversed by the MARL Project. For all of these reasons, the Petition should be denied.

In further support of its opposition to the Petition, NEET MA responds to the specific paragraphs of the Petition as follows:

II. ANSWER TO SPECIFIC AVERMENTS

A. SECTION I.

Admitted.

B. SECTION II.

Admitted.

C. SECTION III.

Section III of the Petition pertains to the Complainant’s legal representation, to which no responsive pleading is required.

D. SECTION IV.

Admitted in part and denied in part. Specifically, to the extent that the Petitioner avers that she has a direct, immediate, and substantial interest in the proceeding or that the facts of Section IV. as set forth establish direct impacts to the Petitioner, NEET MA denies the same. NEET MA lacks sufficient information or knowledge as to the Petitioner’s property ownership and, therefore, denies averments to the same. The remainder of the averments are admitted.

E. SECTION V.

A. Lack of Demonstrated Public Need

Denied. The averments contained within Section V.A. related to need are legal conclusions to which no response is required. However, to the extent a response is required, it is denied that NEET MA has failed to demonstrate that the MARL Project is needed.

B. Improper Use of Eminent Domain and Property Rights Impact

Denied. The averments contained within Section V.B. related to constitutional concerns and the general effect of eminent domain proceedings, which have not been initiated, on property ownership are legal conclusions to which no response is required. To the extent a response is required, NEET MA denies the factual averments contained within Section V.B.

In further response, NEET MA further refers to Section I. of this Answer, reiterating its position that a general concern that the evidentiary elements of the proceedings be investigated and duly considered does not establish that the Petitioner themselves will suffer an injury that is substantial. The Petitioner is not a landowner within the Proposed or Alternate ROW Corridors and, therefore, would not be affected by eminent domain proceedings, if and when those are initiated.

It is further denied that the specific averments contained within Section V.B. of the Petition are relevant to the Commission's considerations regarding any eminent domain applications that may be filed.

C. Agricultural and Land Use Impacts

Denied. It is denied that the MARL Project will have significant adverse impacts on agricultural operations and rural land use, as averred within Section V.C. of the Petition.

In further response, NEET MA further refers to Section I. of this Answer, reiterating its position that a general concern that the evidentiary elements of the proceedings be investigated and duly considered does not establish that the Petitioner themselves will suffer an injury that is substantial. The Petitioner is not a landowner within the Proposed or Alternate ROW Corridors and, has not established how she would suffer specific harms as related to agricultural operations and rural land use.

D. Direct Economic Harm

Denied. It is denied that the MARL Project will cause substantial economic harm, as averred within Section V.D. of the Petition.

In further response, NEET MA further refers to Section I. of this Answer, reiterating its position that a general concern that the evidentiary elements of the proceedings be investigated and duly considered does not establish that the Petitioner themselves will suffer an injury that is substantial. The Petitioner is not a landowner within the Proposed or Alternate ROW Corridors, and has not established how she, specifically, would suffer substantial economic harms.

E. Indirect Economic Harm to Industry

Denied. It is denied that the MARL Project will cause indirect economic harm such that it will strain grid supply and negatively impact local industry, as averred within Section V.E. of the Petition.

In further response, NEET MA further refers to Section I. of this Answer, reiterating its position that a general concern that the evidentiary elements of the proceedings be investigated and duly considered does not establish that the Petitioner themselves will suffer an injury that is substantial. The Petitioner is not a landowner within

the Proposed or Alternate ROW Corridors, has not indicated whether she is involve with local businesses and manufacturers in any capacity, and has not otherwise established how she, specifically, would suffer the harms averred within Section V.E. of the Petition.

F. Environmental Impacts

Denied. It is denied that the MARL Project will result in significant environmental impacts, as averred within Section V.F. of the Petition.

In further response, NEET MA further refers to Section I. of this Answer, reiterating its position that a general concern that the evidentiary elements of the proceedings be investigated and duly considered does not establish that the Petitioner themselves will suffer an injury that is substantial. The Petitioner is not a landowner within the Proposed or Alternate ROW Corridors, and has not established how the environmental impacts as averred in Section V.F. would specifically affect her.

G. Failure to Evaluate Alternatives

Denied. It is denied that NEET MA has failed to demonstrate that its selection of the Proposed Route was reasonable, given the available demonstrated alternatives.

In further response, NEET MA further refers to Section I. of this Answer, reiterating its position that a general concern that the evidentiary elements of the proceedings be investigated and duly considered does not establish that the Petitioner themselves will suffer an injury that is substantial. The Petitioner is not a landowner within the Proposed or Alternate ROW Corridors, and has failed to otherwise demonstrate why the selection or evaluation of route alternatives as stated within Section V.G. would specifically affect her.

H. Violation of Due Process

Denied. The averments contained within Section V.H. related to notice, constitutional violations, and due process are legal conclusions to which no response is required. To the extent a response is required, NEET MA denies the factual averments contained within Section V.H. NEET MA also denies that it did not comply with the Commission's regulations at Ch. 57, Subch. G in providing notice to individuals and entities.

F. SECTION VI.

Denied. NEET MA lacks sufficient information or knowledge as to the specific communications received by the Petitioner from her constituents and, therefore, denies the same.

In further response, NEET MA further refers to Section I. of this Answer, reiterating its position that a general concern that the evidentiary elements of the proceedings be investigated and duly considered does not establish that the Petitioner themselves will suffer an injury that is substantial. The Petitioner is not a landowner within the Proposed or Alternate ROW Corridors, and has failed to otherwise demonstrate why the concerns as listed in Section VI will specifically affect her.

NEET MA again refers to Section I. of this Answer, reiterating its position that the Petitioner's position as a legislator is an insufficient basis upon which to confer standing.

A. Ratepayer Burden and Cost Concerns

Denied. NEET MA lacks sufficient information or knowledge as to the specific communications received by the Petitioner from her constituents and, therefore, denies the same.

In further response, NEET MA further refers to Section I. of this Answer, reiterating its position that a general concern that the evidentiary elements of the

proceedings be investigated and duly considered does not establish that the Petitioner themselves will suffer an injury that is substantial. The Petitioner is not a landowner within the Proposed or Alternate ROW Corridors, and has failed to otherwise demonstrate why the concerns as listed in Section VI.A. will specifically affect her.

NEET MA again refers to Section I. of this Answer, reiterating its position that the Petitioner's position as a legislator is an insufficient basis upon which to confer standing.

B. Grid Reliability and Energy Security

Denied. NEET MA lacks sufficient information or knowledge as to the specific communications received by the Petitioner from her constituents and, therefore, denies the same.

In further response, NEET MA further refers to Section I. of this Answer, reiterating its position that a general concern that the evidentiary elements of the proceedings be investigated and duly considered does not establish that the Petitioner themselves will suffer an injury that is substantial. The Petitioner is not a landowner within the Proposed or Alternate ROW Corridors, and has failed to otherwise demonstrate why the concerns as listed in Section VI.C will specifically affect her.

NEET MA again refers to Section I. of this Answer, reiterating its position that the Petitioner's position as a legislator is an insufficient basis upon which to confer standing.

C. Public Health and Safety

Denied. NEET MA lacks sufficient information or knowledge as to the specific communications received by the Petitioner from her constituents and, therefore, denies the same.

In further response, NEET MA further refers to Section I. of this Answer, reiterating its position that a general concern that the evidentiary elements of the proceedings be investigated and duly considered does not establish that the Petitioner themselves will suffer an injury that is substantial. The Petitioner is not a landowner within the Proposed or Alternate ROW Corridors, and has failed to otherwise demonstrate why the concerns as listed in Section VI.C. will specifically affect her.

NEET MA again refers to Section I. of this Answer, reiterating its position that the Petitioner's position as a legislator is an insufficient basis upon which to confer standing.

D. First Responder Safety and Emergency Response

Denied. NEET MA lacks sufficient information or knowledge as to the specific communications received by the Petitioner from her constituents and, therefore, denies the same. It is also denied that NEET MA has failed to provide evidence as to the safety of the proposed transmission line.

In further response, NEET MA further refers to Section I. of this Answer, reiterating its position that a general concern that the evidentiary elements of the proceedings be investigated and duly considered does not establish that the Petitioner themselves will suffer an injury that is substantial. The Petitioner is not a landowner within the Proposed or Alternate ROW Corridors, and has failed to otherwise demonstrate why the concerns as listed in Section VI.D. will specifically affect her.

NEET MA again refers to Section I. of this Answer, reiterating its position that the Petitioner's position as a legislator is an insufficient basis upon which to confer standing.

E. Fundamental Fairness and Constitutional Principles

Denied. NEET MA lacks sufficient information or knowledge as to the specific communications received by the Petitioner from her constituents and, therefore, denies the same. Further, the averments contained within Section VI.E. related to due process are legal conclusions to which no response is required. To the extent a response is required, NEET MA denies the factual averments contained within Section VI.E. NEET MA also denies that it did not comply with the Commission's regulations at Ch. 57, Subch. G in providing notice to individuals and entities.

In further response, NEET MA further refers to Section I. of this Answer, reiterating its position that a general concern that the evidentiary elements of the proceedings be investigated and duly considered does not establish that the Petitioner themselves will suffer an injury that is substantial. The Petitioner is not a landowner within the Proposed or Alternate ROW Corridors, and has failed to otherwise demonstrate why the concerns as listed in Section VI.E. will specifically affect her.

NEET MA again refers to Section I. of this Answer, reiterating its position that the Petitioner's position as a legislator is an insufficient basis upon which to confer standing.

F. Disproportionate Local Impact

Denied. It is denied that NEET MA has failed to demonstrate that the MARL Project is needed. It is also denied that the MARL Project will result in disproportionate impacts such that they will affect the Petitioner.

In further response, NEET MA further refers to Section I. of this Answer, reiterating its position that a general concern that the evidentiary elements of the proceedings be investigated and duly considered does not establish that the Petitioner themselves will suffer an injury that is substantial. The Petitioner is not a landowner within

the Proposed or Alternate ROW Corridors, and has failed to otherwise demonstrate why the concerns as listed in Section VI.F. will specifically affect her.

NEET MA again refers to Section I. of this Answer, reiterating its position that the Petitioner's position as a legislator is an insufficient basis upon which to confer standing.

G. SECTION VII.

Denied. The averments contained within Section VII. of the Petition are requests for relief to which no responsive pleading is required. To the extent a response is deemed necessary, NEET MA denies that the Petitioner is entitled to the relief requested.

H. SECTION VIII.

Section VII. of the Petition sets forth the verification and signature, to which no responsive pleading is required.

III. CONCLUSION

WHEREFORE, for the foregoing reasons, NextEra Energy Transmission MidAtlantic, Inc. respectfully requests that the Commission deny the Petition to Intervene filed by Charity Grimm Krupa and reject all other relief requested therein or, in the alternative, that the Commission limit the Petitioner's participation in the above-captioned proceedings to the extent that it will limit the unnecessary duplication of discovery requests and testimony submitted in the proceedings.

Respectfully submitted,



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