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File #: 205388

July 23, 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**

**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 Second Prehearing Conference Memorandum of NextEra Energy Transmission MidAtlantic, Inc. in the above-captioned proceedings.

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

Matthew L. Homsher, Secretary
July 23, 2026
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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Garrett P. Lent". The signature is fluid and cursive, with the first name "Garrett" and last name "Lent" clearly distinguishable.

Garrett P. Lent

GPL/sll
Enclosures

cc: Administrative Law Judge John M. Coogan (*Via Email Only*)
Administrative Law Judge Erin L. Gannon (*Via Email Only*)
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, INTERVENORS AND PROTESTERS

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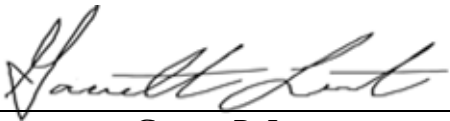
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Dated: July 23, 2026



Garrett P. Lent

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of NextEra Energy Transmission	:	Docket Nos. A-2026-3060921
MidAtlantic, Inc., for All of the Necessary	:	G-2026-3060941
Authority, Approvals, and Certificates of	:	G-2026-3060942
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 Transmission	:	Docket No. A-2026-3060856
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	:	

**SECOND PREHEARING CONFERENCE MEMORANDUM
OF NEXTERA ENERGY TRANSMISSION MIDATLANTIC, INC.**

TO ADMINISTRATIVE LAW JUDGES JOHN M. COOGAN AND ERIN L. GANNON:

Pursuant to the Second Prehearing Conference Order of Administrative Law Judges John M. Coogan and Erin L. Gannon (the “ALJs”), dated June 26, 2026, and 52 Pa. Code §§ 5.221-5.224, NextEra Energy Transmission MidAtlantic, Inc. (“NEET MA” or the “Company”) hereby submits its Prehearing Conference Memorandum.

I. SERVICE ON NEET MA

1. NEET MA will be represented in this case by the counsel named below. Copies of all documents should be served on MAIT as follows:

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Please be advised that Mr. Garrett P. Lent will speak as the lead attorney for NEET MA for purposes of the prehearing conference. However, other counsel for NEET MA will be participating and available during the telephonic prehearing conference as needed. Appropriate motions for admission *pro hac vice* on behalf of Attorneys Davis and Galanis have been submitted as of July 20, 2026.

II. BACKGROUND

2. On April 6, 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”).

3. Contemporaneously with the CPC Application, 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 (the “Siting Application”).

4. PJM Interconnection, L.L.C. (“PJM”) identified a need to address significant and widespread reliability criteria violations on the Bulk Electric System (“BES”) serving the PJM Region, including Pennsylvania, due to anticipated load growth and resource retirements. To address these projected violations, PJM approved multiple transmission projects and enhancements, including the MidAtlantic Resiliency Link Project (“MARL Project”). NEET MA is obligated to construct the Pennsylvania Portions of the MARL Project and, as such, is seeking Commission approval to begin to furnish and supply electric transmission service to or for the public through the new 500 kV transmission line that is the subject of the MARL Project.

5. Because the facts, evidence, and approvals required in the CPC Application are interrelated with the issues and evidence to be presented and addressed for the Siting Application, NEET MA requested, pursuant to 52 Pa. Code § 57.75(i)(1), that both of the above-captioned

Applications and associated proceedings be consolidated and considered simultaneously for purposes of hearings and decisions.

6. On March 10, 2026, ALJ John M. Coogan issued a Prehearing Conference Order in the Siting Application proceeding providing, among other things, that a Telephonic Prehearing Conference would be held on Wednesday, May 6, 2026 at 10:00 AM.

7. On March 26, 2026, ALJ John M. Coogan issued a Prehearing Conference Order in the CPC Application proceeding providing, among other things, that the Telephonic Prehearing Conference in the CPC Application proceeding would be held contemporaneously with the Siting Application Prehearing Conference on Wednesday, May 6, 2026 at 10:00 AM.

8. The Prehearing Conference Orders also provided that formal protests and petitions to intervene must be filed in accordance with 52 Pa. Code (relating to public utilities) on or before May 1, 2026.

9. Notice of the above-captioned CPC and Siting Applications was published in the March 21, 2026 edition of the *Pennsylvania Bulletin*.

10. On April 30, 2026, a Judge Addition Notice was issued, informing the parties that ALJ Erin L. Gannon was added as a Presiding Officer in the proceeding.

11. On May 1, 2026, OCA filed a Petition for Interlocutory Review and Answer to Material Question.

12. On May 4, 2026, OCA filed a Corrected Petition for Interlocutory Review and Answer to Material Question.

13. At the May 6, 2026 prehearing conference, the ALJs consolidated the CPC Application and the Siting Application.¹ They also decided that, for any protests and/or petitions to intervene filed on or before May 29, 2026, NEET MA may respond on or before June 12, 2026.²

14. On May 11, 2026, NEET MA filed a Brief in Opposition to OCA's Petition for Interlocutory Review.

15. On May 14, 2026, Petitioner Krupa filed a Petition for Stay and a Response in Both Opposition and in Support of OCA's Petition for Interlocutory Review and in Support of Full Commission Review of Issues Concerning Public Need, Siting Authority, Costs, Benefits and Eminent Domain.

16. Also on May 14, 2026, the Center for Coalfield Justice ("CCJ") filed an Answer and Brief in Response to OCA's Petition for Interlocutory Review.

17. On May 18, 2026, the ALJs issued a Procedural Order which, *inter alia*, provided information on the protests and petitions to intervene filed in the above-captioned dockets, active parties of record, and memorializing the agreement from the May 6 prehearing conference that the due date for filing pleadings in response to protests and petitions to intervene.

18. By the May 29, 2026 deadline agreed upon at the First Prehearing Conference, fifty Protests or Petitions to Intervene were filed with the Commission. This includes the protest of the Office of Consumer Advocate ("OCA").

19. On June 1, 2026, the Commission issued an Opinion and Order ("June 2026 Order") disposing of OCA's Petition for Interlocutory Review. The Commission declined to answer OCA's Material Questions, finding the Petition for Interlocutory Review to be improper.³

¹ Tr. 11.

² Tr. 47-48.

³ June 2026 Order at 3 and Ordering Paragraph No. 1.

20. On June 3, 2026, NEET MA filed an Answer to Petitioner Krupa's Petition for Stay.

21. On June 8, 2026, Susan Hager filed a Protest.

22. On June 11, 2026, a Further Telephonic Prehearing Conference Notice was issued, providing that a second telephonic prehearing conference would be held on Wednesday, July 29, 2026 at 10:00 AM.

23. On June 12, 2026, NEET MA filed 40 Answers or Preliminary Objections to 40 parties' Petitions to Intervene and/or Protests.

24. On June 16, 2026, Petitioner Linda Maust-Jacobs filed a Rebuttal and Answer to NEET MA's Answer to her Petition to Intervene.

25. Also on June 16, 2026, NEET MA filed two Amended Answers to two Petitions to Intervene, two Motions for Leave to File Answers *Nunc Pro Tunc*, Two Answers *Nunc Pro Tunc*, one Motion for Leave to File Preliminary Objection *Nunc Pro Tunc*, and one Preliminary Objection *Nunc Pro Tunc*.

26. On June 23, 2026, Petitioners Krupa and Bozek filed a Answers to the Preliminary Objections of NEET MA.

27. On June 26, 2026, the ALJs issued a Second Prehearing Conference Order, which, among other things, directed parties to file and distribute prehearing memoranda on or before July 23, 2026.

28. On June 29, 2026, the ALJs issued a Procedural Order, which detailed Protests and Petitions to Intervene filed, as well as party status.

29. Also on June 29, 2026, NEET MA filed Preliminary Objections to Susan Hager's Protest.

30. On July 1, 2026, the ALJs issued Prehearing Order #1, which disposed of the Protests and Petitions to Intervene filed by May 29, 2026 and established party statuses. As of the July 1, 2026 Procedural Order, the active parties include: NEET MA; OCA; CCJ; James E. Rockis, Quarter Pine Tree Farm Christmas Shoppe, LLC and J.E. Rockis Rental & Supply, Inc.; Charity Grimm Krupa; Linda Maust-Jacobs; and Ponderosa Properties.

31. On July 14, 2026, the ALJs issued Prehearing Order #2, which denied the Preliminary Objections to the Protest of Susan Hager.

32. On July 16, 2026, the ALJs issued Prehearing Order #3, which denied Petitioner Krupa's Petition for Stay.

III. ISSUES

A. CPC APPLICATION

33. NEET MA intends to demonstrate that there is a public need for the service to be provided through the MARL Project in that it is necessary or proper for the service, accommodation, convenience, or safety of the public, and that NEET MA is technically, financially, and legally fit to provide electric transmission service in Greene County and Fayette County, Pennsylvania.

34. More specifically, NEET MA intends to demonstrate that the service to be provided through the MARL Project, interconnected with the interstate electric grid serving more than 67 million customers in the PJM Region, including Pennsylvania, is one of several solutions necessary to maintain the reliability of the transmission grid and to prevent thermal overload violations and voltage collapse violations which could impact reliability in Pennsylvania and in the greater PJM Region.

35. Further NEET MA intends to demonstrate its fitness to provide electric transmission service. NEET MA has the requisite technical, financial, and legal fitness. It has

existing managerial and technical experience, operates under a support services model, and is able to draw on the significant resources, experience, and project management practices of its parent companies, NextEra Energy Transmission, LLC and NextEra Energy, Inc.

36. Finally, NEET MA intends to demonstrate that the services to be provided through the Affiliated Interest Agreements with its affiliated operating and holding companies, as well as with NextEra Energy Transmission Virginia, Inc., which are the subjects of Docket Nos. G-2026-3060941 and G-2026-3060942, are necessary and proper for NEET MA to successfully construct, own, operate, and maintain the Pennsylvania Portion of the MARL Project.

37. NEET MA reserves the right to raise and respond to additional issues related to the CPC Application if and as those issues should arise.

B. SITING APPLICATION

38. NEET MA intends to demonstrate that the above-captioned Project satisfies the criteria applicable to the Commission's approval of high-voltage electric transmission lines at 52 Pa. Code § 57.72 *et seq.* and its Interim Guidelines for the Filing of Electric Transmission Line Siting Applications at 52 Pa. Code § 69.3101 *et seq.* NEET MA further submits that it has satisfied these requirements based upon the information included in its initial filing, which includes its written direct testimony and exhibits.

39. More specifically NEET MA intends to demonstrate that there is a need for the MARL Project in that it is necessary to address projected widespread system conditions including thermal overloads and voltage violations leading to blackouts in the greater PJM Region. 52 Pa. Code § 57.76(a)(1).⁴

⁴ NEET MA maintains that the Commission is preempted from denying the MARL Project based upon a finding that there is not a sufficient need for it, because the MARL Project is a baseline reliability project that has been reviewed by PJM and which PJM has determined there is a regional reliability need for. This is consistent with the recent holding of the U.S. Court of Appeals for the Third Circuit's recent holding in *Transource Pa., LLC v.*

40. NEET MA also intends to demonstrate that the MARL Project will not create an unreasonable risk of danger to the health and safety of the public in that its design will meet or exceed National Electric Safety Code requirements, as well as other applicable local and state codes and other standards as described in the Siting Application and in NEED MA Statement No. 6. 52 Pa. Code § 57.76(a)(2).

41. Further, NEET MA will demonstrate that the MARL Project is in compliance with the applicable statutes and regulations providing for the protection of the natural resources within the Commonwealth of Pennsylvania. 52 Pa. Code § 57.76(a)(3).

42. Finally, NEET MA will demonstrate that the MARL Project will have minimum adverse environmental impact when compared to available alternatives, consistent with 52 Pa. Code § 57.76(a)(4).

43. NEET MA reserves the right to raise and respond to additional issues related to the Siting Application if and as those issues should arise.

C. CONSOLIDATION OF THE PROCEEDINGS

44. The ALJs directed parties to address their positions on the impact of the June 2026 Order on the consolidation of the instant proceedings.

45. NEET MA submitted its CPC Application and Siting Application contemporaneously. The utility service that NEET MA seeks authority to provide as a Pennsylvania public utility in its CPC Application is the service that NEET MA seeks to provide through the MARL Project, which is the subject of the Siting Application. Moreover, the public

DeFrank. 156 F.4th 351, 379 (3rd Cir. 2025), *affirming Transource Pa., LLC v. DeFrank*, 705 F. Supp. 3d 266 (M.D. Pa. 2023) (“*Transource*”).

need for the service NEET MA seeks to provide is directly related to the need for the MARL Project itself.⁵

46. As stated above in Paragraph 5, NEET MA is of the position that the facts, evidence, and approvals required in the CPC Application are interrelated with the issues and evidence to be presented and addressed for the Siting Application, NEET MA requested, pursuant to 52 Pa. Code § 57.75(i)(1), and therefore that the CPC Application and Siting Application should remain consolidated. For example, the evidence that NEET MA has submitted as part of its consolidated CPC and Siting Applications in support of the need for NEET MA to provide service in Greene and Fayette Counties is directly related to the specific need for the MARL Project. Requiring this evidence to be separated into different testimonies for the CPC and Siting Application proceedings would be duplicative and unnecessary, potentially creating confusion among parties to the proceeding as to the correct proceeding in which to address these issues.

47. However, NEET MA also acknowledges the Commission's concerns related to the disposing of the CPC Application prior to disposing of the Siting Application.⁶

48. Therefore, NEET MA maintains that a consolidated, but phased, approach to the proceedings is appropriate.

⁵ NEET MA reiterates that the need for the MARL Project has been determined by PJM as a major component of a collection of electric solutions selected by PJM to address regional reliability issues and, thus, that it is not within the Commission's authority to undermine PJM's inclusion of the MARL Project in its regional transmission plan by rejecting that project based on a finding of a lack of need. *See Transource*, 156 F. 4th at 379. NEET MA reiterates that PJM's determination that there is a need for transmission service over the MARL Project and determination that NEET MA should construct, own, and operate the transmission facilities required to address this need demonstrates that there is a need for the electric transmission service contemplated by this application. Therefore, the service NEET MA seeks CPC authority to provide "is necessary or proper for the service, accommodation, convenience, or safety of the public." 66 Pa.C.S. § 1103(a) (emphasis added).

⁶ *See* June 1, 2026 Order, at p. 12, n.2 ("These consolidated cases may be bifurcated with the Application for CPC proceeding to litigation while the siting application and petition are held in abeyance pending the outcome of the CPC Application.").

49. Specifically, the scheduling and litigation of the CPC Application and Siting Application should be phased such that testimony, hearings, briefing, and a final order disposing of the CPC Application all occur prior to litigation of the Siting Application.

50. This proposal appropriately addresses the concerns set forth by the Commission in the June 2026 Order, while recognizing the interrelated issues of law and fact between the CPC and Siting Application and prioritizing administrative efficiency and party and Commission resources. The schedule proposed by NEET MA, below, reflects this consolidated, phased approach.

51. To the extent that any further action is required to address this issue, NEET MA believes that the consolidated CPC Application and Siting Application may be “bifurcated” in the manner proposed, and the Siting Application may be held in abeyance pending resolution of the CPC Application.⁷

52. Finally, NEET MA has engaged in discussions with other parties prior to the filing of this Second Prehearing Memorandum regarding other parties’ positions on consolidation of the CPC and Siting Applications.

53. As of the filing of this Second Prehearing Memorandum, four active parties have informed the Company that they are of the position that the CPC and Siting Applications should not remain consolidated: Ponderosa Properties LLC; James E. Rockis and Rockis Entities; CCJ; and OCA.

IV. WITNESSES

54. Below is a list of the witnesses that NEET MA intends to call in this proceeding, the subject areas of their testimony, and the exhibits they sponsored. NEET MA notes that these

⁷ *Id.*

witnesses have already submitted direct testimony and supporting exhibits in support of both the CPC Application and the Siting Application. NEET MA reserves the right to call additional witnesses, present testimony, or both, on additional issues and subject matter that may arise during the course of this proceeding.

Witness	Statement	Subjects Addressed	Exhibits
Kaitlin McCormick Senior Director, Development NextEra Energy Transmission, LLC 700 Universe Blvd. Juno Beach, FL 33408	NEET MA Statement No. 1	Overview of NEET MA Overview of the MARL Project Obligation to Complete the MARL Project Qualifications of NEET MA Operating the MARL Project	KM-1: NEET MA Certificate of Formation and Certificate of Good Standing KM-2: Designated Entity Agreement with PJM KM-3: Simplified Organizational Chart KM-4: Map of the Proposed MARL Project KM-5: Matrix of Anticipated Permits for the MARL Project KM-6: Public Outreach Materials
Matt Pawlowski Vice President, Development NextEra Energy Transmission, LLC 700 Universe Blvd. Juno Beach, FL 33408	NEET MA Statement No. 2	Need for the MARL Project Description of the MARL Project Alternatives to Construction Consequences of Not Constructing the Project Cost	MP-1: PJM Reliability Analysis Update (dated October 31, 2023) MP-2: Summary of NEET MA Proposals to PJM 2022 RTEP Window 3 MP-3: PJM Reliability Analysis Update (dated December 5, 2023) MP-4: PJM Reliability Analysis Update (dated January 7, 2025) MP-5: PJM Reliability Analysis Update (dated June 5, 2025)

Sami Absulsalam, Ph.D., P.Eng. Director of Transmission Planning PJM Interconnection, L.L.C. 2750 Monroe Blvd. Audubon, Pennsylvania 19403	NEET MA Statement No. 3	PJM Process Need for the MARL Project Selection by PJM	SA-1: Curriculum Vitae of Sami Abdulsalam, Ph.D., P.Eng. SA-2: Operating Agreement, Schedule 6, PJM's Regional Transmission Expansion Planning Protocol SA-3: PJM Manual 14B – PJM Region Transmission Planning Process (Revision 56) SA-4: PJM RTEP – 2022 RTEP Proposal Window 3, Problem Statement and Requirements SA-5: Special TEAC Materials, 2023 RTEP 2028 Preliminary Summer & Winter Generation Deliverability 500 kV and Above Violation Summary (April 27, 2023) SA-6: Reliability Analysis Report, 2022 Window 3 (December 8, 2023) SA-7: TEAC Materials, Reliability Analysis Update (October 3, 2023) SA-8: Constructability & Financial Analysis Report, 2022 Window 3 (November 17, 2023) SA-9: TEAC Materials, Reliability Analysis Update, 2022 Window 3 Upgrades – Scope Changes/Cancellations Baseline Reliability Projects (July 9, 2024)
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Andrew Gledhill Manager of Resource Adequacy PJM Interconnection, L.L.C. 2750 Monroe Blvd. Audubon, Pennsylvania 19403	NEET MA Statement No. 4	Load Forecasting by PJM PJM's Development of Load Forecasting Reports	AG-1: PJM Manual 19: Load Forecasting and Analysis AG-2: PJM 2024 Load Forecast Supplement AG-3: Itron Inc.'s 2022 PJM Model Review Report AG-4: PJM 2022 Load Forecast Report AG-5: PJM 2023 Load Forecast Report AG-6: PJM 2024 Load Forecast Report AG-7: PJM 2025 Load Forecast Report AG-8: PJM 2026 Load Forecast Report
Heather Heater Partner Environmental Resources Management, Inc. 1701 Golf Rd., Suite 1-700 Rolling Meadows, IL 60008	NEET MA Statement No. 5	Siting Study Alternative Routes Proposed Route	
Phillip Givens Senior Manager of Transmission Project Engineering NextEra Energy Resources, LLC 700 Universe Blvd. Juno Beach, FL 33408	NEET MA Statement No. 6	Design Features Safety Features Engineering and Construction Process	PG-1: One-Line Diagram of the MARL Project PG-2: Drawings of Expected Structure Types PG-3: Proposed Route Slope Statistics and Contour Maps PG-4: Project Design Criteria
Matthew Boykin Senior Director, Business Management NextEra Energy Transmission, LLC 700 Universe Blvd. Juno Beach, FL 33408	NEET MA Statement No. 7	Financial Qualifications Financing the Construction and Operation of the MARL Project Cost Recovery Affiliate Interest Agreements Cost Allocation	Exhibit MB-1: Copy of NEET MA's FERC Formula Rate Template Exhibit MB-2: Corporate Support Services Agreements
Sarah Powers Senior Director, Development	NEET MA Statement No. 8	Acquisition of ROW and Easements	SP-1: Notice Packets Required by 52 Pa. Code §§ 57.91 and 69.3102 SP-2: Sample Right-of-Entry Agreement and Option and

NextEra Energy Transmission, LLC 700 Universe Blvd. Juno Beach, FL 33408		Status of ROW and Easement Negotiations	Transmission Easement Agreement SP-3: Land Agent Code of Conduct SP-4: Project Fact Sheet and Answers to Frequently Asked Questions SP-5: Detailed Maps Showing Properties Traversed by the Pennsylvania Portions of the MARL Project SP-6: Vegetation Management Plan
Fletcher Mangum, Ph.D. CEO Mangum Economics, Inc. 4510 Cox Rd., Suite 202 Glen Allen, VA 23060	NEET MA Statement No. 9	Economic Benefit Analysis Economic Impacts	AFM-1: MARL Economic & Fiscal Contribution Report AFM-2: Curriculum Vitae of Fletcher Mangum, Ph.D.

55. In addition, the following Attachments were included with the Siting Application filing:

- Attachment 1: Commission Regulation Cross-Reference Matrix
- Attachment 2: Necessity Statement
- Attachment 3: Routing Study
- Attachment 4: List of Owners of Property within the Proposed Route Right of Way
- Attachment 5: List of Governmental Agencies, Municipalities, and Other Public Entities Receiving the Application
- Attachment 6: List of Governmental Agencies, Municipalities, and Other Public Entities Contacted
- Attachment 7: List of Public Locations Where the Siting Application Can Be Viewed by the Public
- Attachment 8: Cost Allocation

56. Finally, the following Appendices were included with the CPC Application filing:

- Appendix 1: Organizational Chart
- Appendix 2: Designated Entity Agreement with PJM
- Appendix 3: NextEra Energy's Most Recent Form 10-K
- Appendix 4: Most Recent S&P and Moody's Credit Reports
- Appendix 5: Corporate Support Services Agreements
- Appendix 6: NEET MA Certificate of Formation and Certificate of Good Standing

57. To the extent that addressing the consolidation of the CPC Application and Siting Application necessitates any changes to the witnesses or evidence presented by NEET MA, NEET MA further reserves its rights to make any such changes or updates that may be required.

V. DISCOVERY

58. As of the date of submission of this Prehearing Memorandum, NEET MA has been served with one set of discovery requests, from CCJ.

59. NEET MA is not requesting any modification of the Commission's procedural rules regarding discovery at this time. NEET MA agrees to cooperate with any parties to these matters regarding any reasonable modification to the Commission's procedural discovery rules, which may be necessary for the orderly and timely administration of these proceedings.

VI. PROPOSED SCHEDULE

60. NEET MA will consult with counsel for other parties and any active parties to this proceeding with respect to a proposed procedural schedule, and has proposed the schedule below to the active parties to this matter. At this time, and for the purposes of discussion amongst the parties, the Company proposes the following schedule:

Event	Dates
Second Prehearing conference	July 29, 2026
<i>Phase 1 – CPC Application</i>	
CPC – Other Parties' Direct Testimony	Oct. 19, 2026
CPC – Rebuttal Testimony	Dec. 8, 2026
CPC – Surrebuttal Testimony	Dec. 22, 2026
CPC – Rejoinder Testimony	Jan. 8, 2027
CPC – Hearings* *tentative based on witness and ALJ schedules	Mid-January 2027
CPC – Main Brief Due	Feb. 8, 2027
CPC – Reply Brief Due	February 23, 2027
CPC – Requested ALJ Initial Decision	June 1, 2027
CPC – Requested PUC Decision	July 29, 2027
<i>Phase 2 – Siting Application</i>	
Siting Application – Any Updates Filed	August 30, 2027

Siting Application – Public Input Hearings/Siting Visits	Mid-September 2027
Siting Application – Other Parties’ Direct Testimony	October 1, 2027
Siting Application – Rebuttal Testimony	November 1, 2027
Siting Application – Surrebuttal Testimony	November 22, 2027
Siting Application – Rejoinder Testimony	December 2, 2027
Siting Application – Hearings* *tentative based on witness and ALJ schedules	Mid-December, 2027
Siting Application – Main Brief Due	January 17, 2028
Siting Application – Reply Brief Due	January 31, 2028
CPC – Requested ALJ Initial Decision	Est. March 2028
CPC – Requested PUC Decision	Est. April 2028

VII. SETTLEMENT

61. As of this time, no settlement discussions have been held. NEET MA remains open and available for settlement discussions with the other parties and would support initiatives to begin settlement discussions at the earliest possible date.

Respectfully submitted,



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Date: July 23, 2026

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