

THE MARYLAND GENERAL ASSEMBLY
LEGISLATIVE DISTRICT 5
CARROLL COUNTY

September 18th, 2024

Maryland Public Service Commission
Attn: Frederick H. Hoover, Chairman
6 Saint Paul St., 16th Floor
Baltimore, Maryland 21202

RE: Carroll County Delegation Opposes the Maryland Piedmont Reliability Project

Dear Chairman Hoover,

As the State legislators representing Carroll County in the MD General Assembly, we stand firmly in opposition to the Maryland Piedmont Reliability Project (MPRP). At a recent public forum organized by Delegate Nino Mangione held on August 21, 2024, the contractor, Public Service Enterprise Group (PSEG), presented a timeline for the project that shows the publicly traded company applying for a Certificate of Public Convenience and Necessity (CPCN) by the end of 2024. Our Delegation recommends that the application be denied for the following reasons:

1. This project will bring tremendous harm to our environment and destroy many of our natural features. Most of these routes have the line tearing through woodland, wetlands, streams, creeks, rivers, and a reservoir (manmade but home to much wildlife). Several of these natural habits that are being threatened by the proposed lines are home to bog turtles, a reptile protected under the United States Federal Endangered Species Act.
2. Ratepayers in Carroll County will be expected to shoulder the capital costs of a project that ultimately does not benefit them. The 2022 RTEP Window 3 Expansion (W3), which MPRP is a part of, is expected to incur over \$5 billion in capital expenditures. Ratepayers in Maryland locational deliverability areas are expected to cover \$551 million, an amount which is disproportionately large considering the impetus for W3 was expected load growth in Northern Virginia.

Furthermore, in May 2024, the Federal Energy Regulatory Commission (FERC) adopted a new transmission and cost allocation rule - Order No. 1920. This includes that "Customers pay only for projects from which they benefit." While we understand that FERC Order No. 1920 will not affect the MPRP because FERC already approved PJM's W3 projects and PJM is not required to comply until next year, it is important to note that while the MPRP might benefit PJM's territory as a whole, the citizens of Carroll, Frederick, and Baltimore Counties will see no benefit but still pay for it, as things stand now.

3. The Code of Maryland Regulations (COMAR) for the Public Service Commission (Title 20) states under COMAR 20.79.04.01.A.(5) – “An application for a proposed transmission line or modification to an existing transmission line shall include.... (5) A description of the impact of the project on the economies of the State.” We are very interested in seeing how PSEG completes this section of their CPCN application considering that the project will primarily be benefiting Northern Virginia’s economy and killing the number one industry in Carroll County – agriculture. 50% of Carroll’s land mass is in agricultural use and we are ranked first in Maryland for number of acres of agricultural land preserved. Every single proposed route rips through our beautiful farmland and will result in farmers losing significant revenue or having to shut down their farms entirely.

4. While other W3 projects utilize existing transmission rights of way to increase capacity while minimizing disruptions, MPRP does not utilize existing rights of way despite there being a Baltimore Gas and Electric Co. right of way spanning the connection points that MPRP covers. PJM chose to prioritize solutions that were “expandable” and “cost efficient” rather than minimizing disruptions to property and livelihoods. In fact, of the 72 proposals received by PJM, 22 of them would have upgraded existing infrastructure.

Senator Chris West of our delegation has recommended that PSGE consider reconductoring existing transmission lines as compared to building a new transmission line. Senator West said in a published memo, “This means that the existing electrical transmission line across Baltimore and Carroll Counties, which is over 65 years old, could be reconducted, replacing the old conductors with the modern advanced conductors, and then could transmit twice as much electricity between the Coniston substation and the Doubs substation. There would not be a need for a second transmission line.”

Potomac Edison is doing this right now in Frederick and Montgomery Counties for a project they were awarded by PJM in late 2023 that is very similar to the MPRP. This project involves rebuilding Potomac Edison’s current 500kV (the MPRP will also be 500kV) and double-circuit 230kV transmission lines in an existing right of way to accommodate side-by-side transmission structures. The project will utilize an existing transmission right of way, using the reconductoring method and minimizing environmental and community impacts.

We believe that PSEG should prioritize putting the transmission line underground or utilize current infrastructure footprints and corridors rather than spoiling agricultural land and harming property owners. If PJM continues to award contracts to contractors who want to create new transmission line routes as compared to using existing rights of way, due to Maryland being an energy importer, in a short period of time our state will be buried in transmission lines from border to border.

5. Despite PSEG’s multiple claims that the project is still in its early stages, the timeline for the MPRP has been moving at the speed of light with no plan to slow down. In addition to PSEG’s plan to submit their CPCN application to the Public Service Commission by the end of 2024, their target construction start date is the end of 2025. We are uncomfortable with the accelerated

pace in which this project is moving along and believe that more time is needed to study and understand the full impact of the MPRP.

Carroll County's Delegation requests that this letter be accepted by the Public Service Commission and incorporated into the public record. Our delegation strongly opposes the MPRP and encourages the Commission to deny PSEG's application for a CPCN.

Sincerely,



Senator Justin Ready



Senator Chris West



Delegate Christopher "Eric" Bouchat



Delegate April Rose



Delegate Josh Stonko



Delegate Chris Tomlinson

CC: Governor Wes Moore