BEFORE THE
MARYLAND PUBLIC SERVICE COMMISSION

Application of The Potomac Edison Company for a Certificate of Public Convenience and Necessity to Construct the Gore-Doubs-Goose Creek Improvements Project in Frederick and Montgomery Counties, Maryland	* * * * * * * * *	Case No._____

APPLICATION OF THE POTOMAC EDISON COMPANY FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE GORE-DOUBS-GOOSE CREEK IMPROVEMENTS PROJECT

Pursuant to Section 7-207 of the Public Utilities Article of the Maryland Annotated Code (2020) ("PUA"), and Title 20, Subtitle 79 of the Code of Maryland Regulations ("COMAR"), The Potomac Edison Company (the "Applicant" or "Potomac Edison")[1] submits this application (the "Application") to the Maryland Public Service Commission (the "Commission") for a Certificate of Public Convenience and Necessity ("CPCN") requesting authorization to add two 500 kV transmission lines to existing right-of-way ("ROW") located in Frederick and Montgomery Counties, Maryland, to modify existing transmission lines, and to construct related improvements, including connections to substation facilities. The proposed lines are part of a larger project, the Gore-Doubs-Goose Creek Improvements Project ("Project").

I. INTRODUCTION

Potomac Edison's transmission system is responsible for providing transmission service directly to retail customers in Maryland and West Virginia and to wholesale customers in Virginia and Maryland for redelivery to their retail customers. Consequently, Potomac Edison must be able to maintain the overall, long-term reliability of its transmission system as its customers require

[1] Potomac Edison is a FERC-regulated public utility. *See* PUA § 7-207(b)(3)(iii).

more power in the future. The Potomac Edison transmission system is part of the Eastern Interconnection transmission grid and the grid operated by PJM Interconnection, L.L.C. ("PJM")[2]—the regional transmission organization responsible for ensuring reliability of and coordinating movement of electricity through all or parts of 13 states, including Maryland, and the District of Columbia. Through this system, Potomac Edison serves approximately 440,000 retail customers in Maryland and West Virginia.

As part of PJM's 2022 Window 3 competitive solicitation process ("2022 Window 3"), for the 2027 and 2028 study years, PJM identified extensive, severe, and widespread thermal and voltage reliability criteria violations forecasted to impact the bulk electric system throughout the PJM Region. To solve those violations, PJM designated Potomac Edison to construct, own, and maintain certain transmission enhancements and expansions. Potomac Edison will build two new 500 kV lines: Woodside-Goose Creek and Doubs-Aspen. The new Woodside-Goose Creek 500 kV line will enter Frederick County, Maryland, as it crosses the Potomac River, bypass the Potomac Edison-owned Doubs Substation, and proceed south through Montgomery County, Maryland, within existing ROW to the Maryland/Virginia state line and a Point of Interconnection ("POI") with Dominion Energy, Inc. on the southern side of the Potomac River in Virginia. The new Doubs-Aspen 500 kV line will originate from Doubs Substation and proceed south within existing ROW to a POI with Potomac Electric Power Company("PEPCO"), a subsidiary of Exelon Corporation, on property owned by PEPCO and near its Dickerson H Substation, located in Montgomery County, Maryland.

To accommodate these new lines within the existing ROW, the single-circuit Millville-Doubs 138 kV line north of Doubs Substation will be rebuilt to accommodate the northern portion

[2] PJM is the FERC-approved and regulated independent regional transmission organization responsible for ensuring the continued reliable operations of the region's transmission system.

of the new Woodside-Goose Creek line in a double-circuit 500/138 kV configuration. In addition, the ROW south of Doubs to PEPCO's Dickerson H Substation will be reconfigured into three transmission lines, to include the middle portion of the new single-circuit Woodside-Goose Creek 500 kV line and two double-circuit 500/230 kV transmission lines (existing Doubs-Goose Creek built over Doubs-Dickerson and new Doubs-Aspen built over Doubs-Aqueduct/Aqueduct-Dickerson). Finally, the existing, single-circuit Doubs-Goose Creek 500 kV transmission line south of PEPCO's Dickerson H Substation will be reconstructed and shifted within the ROW to accommodate the southern portion of the new Woodside-Goose Creek 500 kV transmission line.

To support the new 500 kV connection at Doubs Substation, Doubs Substation will be expanded on existing Potomac Edison property. The rebuilt Doubs-Goose Creek 500 kV line will be re-terminated in its existing bay at Doubs Substation, and the new Doubs-Aspen 500 kV line will be terminated in the open bay at Doubs Substation. Also at Doubs Substation, Potomac Edison will replace: three 500 kV breakers; 500 kV terminal equipment, including disconnect switches, current transformers, and substation conductor; and relaying.

Potomac Edison respectfully requests that the Commission: (i) issue a procedural schedule that would permit the Commission to enter a final order granting the CPCN by December 20, 2027 which, as described in the accompanying testimony, would allow for construction to begin immediately after approval and (ii) grant such additional authorizations, waivers, approvals and other relief as may be necessary to permit Potomac Edison to begin the work needed to improve the Maryland portion of the Gore-Doubs-Goose Creek line as proposed.

In support of this Application, Potomac Edison includes written, direct testimony of nine witnesses and their supporting exhibits:

Scott M. Humphrys, Supervisor, Transmission Siting, FirstEnergy Service Company ("FirstEnergy Service Co."), provides an introduction of Potomac Edison's witnesses,

summarizes how the Project meets Maryland's regulatory requirements, and describes Potomac Edison's outreach to the public.

Andrew Gledhill, Manager of Resource Adequacy, System Planning Division, PJM, describes PJM's Load Forecasting Process and explains the specific long-term load forecasts on which PJM relied in the 2022 Regional Transmission Expansion Plan ("RTEP") analysis leading to the 2022 Window 3 Competitive Solicitation Process.

Sami Abdulsalam, Ph.D., P.Eng., Director of Transmission Planning, PJM, describes the PJM RTEP process, explains PJM's 2022 Window 3 Process, and details 2022 Window 3 reliability criteria violations as they pertain to the justification of the need for this Project.

Jacquelyn L. Lojek, Manager, Transmission Planning, FirstEnergy Service Co, identifies the electrical need for the Project, its benefits, and the consequences of deferring the Project, and describes the alternatives to the Project that were considered.

Mary M. Grim, Staff Scientist, First Energy Service Co., provides the environmental studies and coordination efforts for the environmental conditions along the Project corridor in Maryland, sponsors the permit matrix applicable to the Project's site, and sponsors copies of environmental studies conducted for the Project.

Jeffrey P. Irons, Supervisor of Transmission Line Design, FirstEnergy Service Co., describes the design and engineering for the Project, its safety and design standards (including the Project's ability to withstand extreme weather), the Project's costs and estimated costs for the alternative routes considered, how the Project will be constructed, and Potomac Edison's plans for operating and maintaining the proposed transmission line after it is constructed, including removing and controlling vegetation.

Lawrence J. Peterson, Senior Environmental Manager, GAI, describes the principal elements of the siting analysis completed for the Project, including an analysis of alternative routes considered and rejected, and an overview of the environmental and permitting requirements for the Project.

Lisa Marinelli, Senior Real Estate Representative, FirstEnergy Service Co., provides a description of the existing property rights related to the construction of the Project, identifies how Potomac Edison determined the potentially affected landowners and properties, and describes the code of conduct applicable to the Company's employees, agents, contractors, and subcontractors in their respective interactions with impacted property owners.

Justin P. Marx, Manager, Transmission Rates, FirstEnergy Service Co., provides an overview of the determination and allocation of revenue requirements associated with the Project and an estimate of the Project's impact on customers' bills.

Attachment 1 to this Application contains a cross-reference chart for Maryland transmission line CPCN regulations. **Attachment 2** contains the Project's Route Selection Study, and **Attachment 3** contains the Project's Environmental Review Document.

II. INFORMATION REQUIRED UNDER COMAR 20.79.01.06

A. Name of the Applicant

The name of the Applicant is The Potomac Edison Company.

B. Address of the Applicant's Principal Business Office

The Applicant maintains a principal business office at 10802 Bower Avenue, Williamsport, Maryland 21795.

C. The Persons Authorized to Receive Notice

The persons authorized to receive notices and communications with respect to the Application are:

Brian J. Knipe
FirstEnergy Service Company
341 White Pond Drive,
Akron, OH 44320
330-384-5795
bknipe@firstenergycorp.com

Robin D. Leone
Saul Ewing LLP
1001 Fleet Street, Floor 9
Baltimore, Maryland 21202
(410) 332-8704
robin.leone@saul.com

D. Locations at Which a Copy of This Application May Be Inspected by the Public

A copy of the Application will be filed with the Commission and may be accessed by the public online through the Commission's website (www.psc.state.md.us). A copy of the Application will also be posted on the Company's website at the following address: https://www.firstenergycorp.com/about/transmission_projects/maryland/gore-doubs-goose-creek.html. The public may also inspect a copy of this Application at the following libraries:

Urbana Regional Library
Frederick County Public Libraries
9020 Amelung Street
Frederick, MD 21704

Maggie Nightingale (Poolesville) Library
Montgomery County Public Libraries
19633 Fisher Avenue
Poolesville, MD 20837

E. Local, State and Federal Government Agencies Having Authority to Approve or Disapprove the Construction or Operation of the Project

To complete the Project, in addition to obtaining a CPCN from the Commission, Potomac Edison has obtained or will seek additional authorizations, approvals, input, or reviews from the following agencies: U.S. Fish and Wildlife Service, U.S. National Park Service, U.S. Army Corps of Engineers, Maryland Department of the Environment, Maryland Historical Trust, Maryland Department of Natural Resources, Maryland Agricultural Land Preservation Foundation, Maryland Department of Transportation, Maryland Office of Planning, Maryland Geological Survey, Montgomery County Department or Permitting Services, and Frederick County Department of Permits and Inspections. For a complete list of approvals sought and consultations undertaken, please refer to the Direct Testimony of Mary M. Grim, Exhibit 6 to this Application.

F. The Information Described Under COMAR 20.79.04.01 for Transmission Lines

See Part III, below.

G. Descriptions of the Proposed Transmission Lines and Modifications to Existing Transmission Lines Required Under COMAR 20.79.04.02

The Project will occur within approximately 18 miles of existing ROW beginning at the Maryland state line in Frederick County and continuing east toward Doubs Substation. The route then proceeds roughly south from around Doubs Substation through Fredrick and Montgomery Counties to the Dickerson H Substation, then continues to the southwest through Montgomery County to the Virginia state line. The Project will include:

- Between the Maryland state line and transmission Structure 82P located approximately 0.5 miles north of Doubs Substation in Frederick County, approximately 2.0 miles of the existing Millville-Doubs 138 kV Transmission Line will be removed and upgraded to

create a double-circuit line with 500 kV wires (Woodside-Goose Creek) installed over 138 kV wires on new steel structures.

- From Structure 82P, the Woodside-Goose Creek 500 kV Transmission Line will be located in expanded ROW on new steel structures for approximately 0.8 miles and will bypass the Doubs Substation on its southwestern side before entering the existing Doubs-Goose Creek transmission corridor on the southern side of the Doubs Substation. Potomac Edison will utilize Company-owned property to build this section of transmission corridor; no easements from private landowners are required.
- For approximately 8 miles within the existing Doubs-Goose Creek transmission corridor from the Doubs Substation to the Dickerson H Substation, two sets of lattice structures supporting an existing 500 kV line and two 230 kV lines will be removed and replaced with three sets of steel structures that will support five transmission lines total (the existing lines plus two new 500 kV lines), to include: the new Woodside-Goose Creek 500 kV Transmission Line on single-circuit structures and the new Doubs-Aspen 500 kV Transmission Line, the existing Doubs-Goose Creek 500 kV Transmission Line, the exiting Doubs-Dickerson 230 kV Transmission Line, and the Doubs-Aqueduct and Aqueduct-Dickerson 230 kV Transmission Lines, all on double-circuit structures.
- For approximately 7 miles from Dickerson H Substation south to the Virginia state line, one set of lattice structures currently supporting an existing 500 kV line will be removed and replaced with two sets of steel structures to support the existing Doubs-Goose Creek 500 kV Transmission Line and the new Woodside-Goose Creek 500 kV Transmission Line.

- The transmission lines south of Dickerson H Substation will be located within the existing Doubs-Goose Creek transmission corridor. The portion of the new Doubs-Aspen 500 kV line for which Potomac Edison will be responsible will end at a POI structure near the Dickerson H Substation, and PEPCO will continue the upgrade work for that circuit south from Dickerson H Substation to the Virginia state line.
- Approximately 0.8 miles of new ROW will be required immediately adjacent to the Dickerson H Substation and approximately 1.8 miles of expanded ROW will be required just north and south of Dickerson H Substation. The new and expanded ROW will be acquired from commercial entities with which Potomac Edison already has easement agreements.

H. An Implementation Schedule for the Project

Construction in Maryland is anticipated to commence in May 2028 with an in-service date of December 31, 2031. Outage coordination for the existing transmission infrastructure will determine construction sequencing for each segment of the Project. The last segment, the single-circuit Woodside-Goose Creek 500 kV Transmission Line in the shared corridor south of Doubs Substation, is anticipated to start in the fall of 2030, subject to other construction sequencing in the corridor.

I. The Environmental Information Required Under COMAR 20.79.04.04 for Transmission Lines

See Part VI, below.

III. INFORMATION REQUIRED UNDER COMAR 20.79.04.01

As required by COMAR 20.79.04.01, the information presented below describes the need for the project in meeting demands for service, the effect of the project on system stability and

reliability, the consequences if the project is delayed or not approved, the cost-effectiveness of the Project, and the Project's impact on the economies of the State.

A.(1) An Explanation of the Need for the Project in Meeting Demands for Service[3]

As described more fully in the Direct Testimony of Jacquelyn L. Lojek, the Gore-Doubs-Goose Creek Improvements Project specifically addresses the load deliverability and reliability needs for the APS and DOM zones to serve the significant load additions forecasted for APS and northern Virginia. Further, the Project is needed to mitigate violations of FirstEnergy and PJM Planning Criteria identified as part of PJM's RTEP analysis for 2022 Window 3. Specifically, the Project will address thermal and voltage violations identified under North American Electric Reliability Corporation ("NERC") Category P1, P2, P3, P4, P6, and P7 planning events. The Project will provide the additional transmission capacity necessary to deliver power reliably to customers in Maryland and surrounding areas.

As discussed more fully in the Direct Testimony of Andrew Gledhill, beginning in 2022, PJM load forecasts now include new data center load in Maryland near the Doubs substation and in northern Virginia that is projected to continue to increase significantly. As a result, as Dr Sami Abdusalam describes in his Direct Testimony, the PJM RTEP Process analysis leading to 2022 Window 3 identified extensive thermal and reactive reliability criteria violations caused by the significant increase in west-to-east power transfers in the 2027 and 2028 study years along the transmission corridor extending from the western part of the PJM Region toward the eastern edge of the Maryland (APS) system in the Doubs area and the northern edge of the Virginia (DOM) system in the Goose Creek area. Those violations could potentially lead to voltage collapse conditions throughout the system in Maryland, Virginia, West Virginia, and Pennsylvania.

[3] *See* COMAR 20.79.04.01A(1) (An application for a proposed transmission line or modification to an existing transmission line shall include an "explanation of the need for the project in meeting demands for service").

A.(2) A Description of the Effect of the Project on System Reliability and Stability[4]

In addition to significantly increasing demand to serve new load, the need for additional, new transmission capability is driven by the cumulative impact of generation changes, deactivations in particular. Further, regional transmission constraints to support higher regional transfer flows are limiting the reliable delivery to Maryland load centers. These factors are contributing to reliability criteria violations forecasted to occur in 2027 and 2028. Accordingly, the proposed Project will positively maintain system stability and reliability by: (1) ensuring the load deliverability and reliability needs for the Maryland and Virginia zones[5] and other surrounding areas, (2) meeting the additional forecasted load demands in Maryland and northern Virginia, (3) increasing west-to-east bulk power transfers, and (4) enhancing the reactive power capability of the system. More details discussing these drivers of reliability need for the Project can be found in the Direct Testimony of Dr. Sami Abdulsalam.

A.(3) Description of the Consequences if the Project Is Delayed or Not Approved[6]

If the Project is delayed or not approved, the reliability of the backbone transmission system in Maryland will be at risk. Fundamentally, delaying the Project could compromise the availability and reliability of transmission service for customer load in Maryland. The thermal and reactive reliability criteria violations that PJM has identified, if unsolved, could lead to a cascading loss of transmission system elements as they exceed thermal loading limits or could lead to a voltage collapse due to insufficient reactive power support. Either situation could potentially lead to an interruption of customer electric service. Without approval, the need for additional

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4 *See* COMAR 20.79.04.01A(2) (An application for a proposed transmission line or modification to an existing transmission line shall include a "description of the effect of the project on system stability and reliability").

5 A map of the PJM transmission zones is available at the following link: https://www.pjm.com/-/media/DotCom/about-pjm/pjm-zones.pdf.

6 *See* COMAR 20.79.04.01A(3) (An application for a proposed transmission line or modification to an existing transmission line shall include a "description of the consequences if the project is delayed or not approved").

transmission to serve the growing demand for electricity across multiple states will not be met. Delaying or not proceeding with the Project would lead to system constraints, limiting the capability of the transmission system to transfer power across the region. Further, power plant retirements in PJM's footprint throughout Maryland have and would likely continue to impact reliability. Additional information regarding the consequences if the Project is not approved appear in the Direct Testimony of Dr. Sami Abdulsalam and the Direct Testimony of Jacquelyn L. Lojek.

A.(4) An Explanation of the Cost Effectiveness of the Project, Including an Estimate of Capital Cost and Annual Operating Cost[7]

The total cost of the Project in Maryland is estimated at $383,700,000. Of that cost, approximately $352,000,000 is associated with the transmission line upgrades while the remaining approximate $31,700,000 is associated with related substation upgrades. The estimated operating cost for the Project is $26,160,000[8]. As described in the Direct Testimony of Jeffrey P. Irons, the Project's operating costs are the lowest among the alternatives considered. And, although the construction costs are higher than the costs to construct the alternatives, the siting of much of the Project in existing ROW will allow Potomac Edison to minimize potential impacts to the surrounding environment and community.

A.(5) A Description of the Impact of the Project on the Economies of the State

The Project will positively contribute to the economies of the State by, among other benefits, helping ensure the reliability of Maryland's transmission system and the continued reliable provision of electric service to Maryland customers. Furthermore, as descripted in detail in the Direct Testimony of Justin P. Marx, the Project follows the Energy Cost Adjustment set in

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7 *See* COMAR 20.79.04.01A(4) (An application for a proposed transmission line or modification to an existing transmission line shall include an "explanation of the cost effectiveness of the project, including an estimate of capital cost and annual operating cost").

8 Operating costs are estimated based on standard costs associated with transmission line maintenance and vegetation schedules. These costs do not include any emergency costs.

the Settlement Agreement in Maryland Public Service Commission Case No 8908. The Project is estimated to increase a typical Potomac Edison Maryland residential customer's monthly bill by approximately $0.08 per month.

As addressed in the Direct Testimony of Lisa Marinelli, the real estate property tax for the calendar year following the in-service date of the Project is estimated to be approximately $1,291,000. Potomac Edison will award major contracts for engineering services, permitting, ROW clearing, access road construction, and transmission line construction. The Project construction workforce is estimated to consist of approximately 65 to 100 workers at any given time, although additional workers could be required due to outage constraints or compressed work schedules.

IV. INFORMATION REQUIRED UNDER COMAR 20.79.04.02

A. Engineering and Construction Features

A complete description of the engineering and construction features of the Project, including corridor dimensions and details of the line, circuits, structures, and conductors is presented in the Direct Testimony of Jeffrey P. Irons. As a result of the Gore-Doubs-Goose Creek Improvements Project, the maximum operating capacity under normal conditions, combing all lines, will be 15,221 MVA (summer) and 17,766 MVA (winter). This represents an increase of approximately 10,082 MVA (+196.2%) for the normal summer rating from the current capacity of 5,139 MVA and an increase of approximately 11,918 MVA (+203.8%) for the normal winter rating from the current capacity of 5,848 MVA. The current and future capacity of the Project is further detailed in the Direct Testimony of Jacquelyn L. Lojek. All new and rebuilt transmission lines to be installed as part of this Project will be alternating current, consisting of three electrical phases (a "threephase" system) elevated above the ground by self-supporting steel pole structures. Each phase of the 500 kV circuits will consist of three conductors (each of which is called a

"subconductor") spaced 18 inches apart and arranged in a triangular bundle, with the apex point down. The existing 230 kV transmission lines will be rebuilt onto double-circuit steel poles as a vertical configuration. The existing conductor for both circuits will change from a single bundle to a double-bundle design. The Millville-Doubs 138 kV Transmission Line will be rebuilt in a vertical configuration on single steel poles, and the conductor will remain as a single bundle.

The subconductor specified for the 230 kV and 500 kV lines on this project is "Finch" with a cross-sectional area of 1,113 thousand circular mils ("kcmil"). This subconductor consists of aluminum conductor supported by steel strands, referred to by the acronym "ACSS," and is rated for operation up to a temperature of 250 degrees Celsius (482 degrees Fahrenheit). The diameter of the Finch semiconductor is 1.29 inches, and its weight is 1.43 pounds per foot, which equates to 4.29 pounds per foot of three-wire conductor. The rated breaking strength of each high strength Finch subconductor is 33,200 pounds. The proposed conductor for the rebuilt Millville-Doubs 138 kV Transmission Line is "Drake," which is a 795 kcmil, 26/7 ACSS conductor. Two shield wires will be installed above the conductors on the double- circuit poles, and one shield wire will be installed above the conductors on the single-circuit poles. All shield wires will be optical ground wires ("OPGW") and composed of aluminum and aluminum-clad steel strands surrounding an aluminum tube containing fiber-optic strands.

Potomac Edison plans to utilize self-supporting steel poles as the support structures for the transmission line conductors. Based on preliminary engineering, Potomac Edison anticipates using structure heights ranging anywhere from approximately 85 feet to approximately 260 feet in height above ground level. The structures will be either suspension or deadend, depending on the strength requirements at each specific structure location. A suspension structure is designed to equally balance the horizontal component of the conductor tension on each side of the suspension structure.

A deadend structure is designed to terminate the full horizontal tension of the conductors at the conductor attachment point on the structure. Moreover, the deadend structure is designed to indefinitely support this horizontal design tension imbalance on the structure. The suspension structures are capable of supporting line deflection angles up to 30 degrees, and deadend structures are typically capable of supporting line deflection angles up to 90 degrees. The nominal length of span between structures will be 918 feet.

B. Property Acquired or to Be Acquired

The majority of the Project will be rebuilt in the existing ROW. As described in the Direct Testimony of Jeffrey P. Irons, approximately 2.8-miles or 16.5 acres of small portions of cleared or expanded ROW will be needed in select areas, including near the Doubs and Dickerson H Substations. North of Doubs Substation, the Woodside-Goose Creek 500 kV Transmission Line will parallel existing high-voltage lines as it trends south and bypasses the Doubs Substation for approximately 0.8 mile on Potomac Edison owned property and will require existing ROW to be cleared. In addition, an approximate 1.8-mile section of the corridor near the Dickerson H Substation property will be expanded to maintain a contiguous ROW of consistent width to accommodate the additional circuits. A 0.4-mile section of that 1.8 miles will be located on property owned by PEPCO by mutual consent. Per the Direct Testimony of Lisa Marinelli, Potomac Edison identified the parcels with existing agreements that will need to be supplemented to accommodate the ROW expansion. Finally, per the Direct Testimony of Mary M. Grim, these expanded sections of ROW are in sparsely populated rural, agricultural, and industrial areas and, therefore, impacts associated with the expanded ROW are expected to be minimal.

C. Access Roads for Construction or Maintenance

Per the Direct Testimony of Jeffrey P. Irons, construction access routes will be installed in accordance with the approved Erosion and Sedimentation Control Plan and, where possible, will

utilize ROW, existing roads, private farms lanes, private forest roads, and similar paths. Although new access routes are not anticipated at this time, if needed for construction, the routes will be re-graded to as near pre-construction contours as practicable and re-vegetated with appropriate vegetation upon completion of construction.

D. Location and Identification of Sites from Which the Project Would Clearly Be Visible

Because the Project will largely occur in existing transmission line ROW and because the rolling and incised terrain and vegetated areas create moderate visibility, the viewshed impacts of the proposed structures are anticipated to be minor. Features within the viewshed of the Project are listed in the Direct Testimony of Mary M. Grim and accompanying exhibits. Specifically, most of the Project area contains rolling terrain and with a range of low to high vegetation density. Accordingly, viewsheds and sightlines are of moderate extent present are expected to occur similarly to the existing ROW, because of terrain relief and the moderate occurrence of agricultural land and open meadow within much of the Project area. Moreover, the existing structures have been in place and a part of the visual landscape for nearly sixty years, and certain areas of the Project currently have a high density of transmission facilities. The area that will accommodate the expanded ROW near the Doubs substation also has a high density of existing transmission lines, as well as forest cover, which limits sightlines. And the additional line of structures to be added between Doubs Substation and the southern Virginia border within the existing corridor are not anticipated to introduce significant, novel visual impacts due to the presence of existing structures and their location in the ROW.

E. Construction Within the 100-Year Floodplain

As provided in the Direct Testimony of Mary M. Grim, Federal Emergency Management Agency 100-year floodplains associated with the Potomac and Monocacy Rivers are crossed by

the existing ROW. Floodplains associated with smaller streams are present within the existing ROW and the area of expanded ROW near Doubs Substation. Applicable permits and approvals, as described in Direct Testimony of Mary M. Grim, Exhibit MMG-9, will be secured prior to construction. Additionally, direct impacts to streams are expected to be avoided during construction by using crossings at existing culverts, temporary bridges, and timber matting.

F. Location and Identification of Public Airports Within One Mile of the Line

Per the Direct Testimony of Lawrence J. Peterson, the project is not located within one mile of any public airport.

G. Depiction on Topographical Map

The required map is attached to the Direct Testimony of Lawrence J. Peterson at Exhibit LJP-1.

V. INFORMATION ON ALTERNATIVE ROUTES UNDER COMAR 20.79.04.03 AND PUA § 7-209

A. Description of Each Alternative Route Considered

As discussed in the Direct Testimony of Mary M. Grim and the Direct Testimony of Lawrence J. Peterson, Potomac Edison retained GAI to conduct an alternative route analysis for the Project. The alternative route analysis focused on identifying routes for the two new 500 kV transmission lines proposed for the Project. As a central element of this assignment, GAI developed and evaluated four alternative line routes for their overall suitability and feasibility and with specific reference to their environmental, cultural, land use, and engineering impacts, as well as factors that could complicate or impede construction or increase the cost of construction. This process was supplemented and refined by coordinating the siting process with the public and with relevant government agencies. As detailed in the Direct Testimony of Lawrence J. Peterson, the three alternative routes were eliminated from consideration because they would create increased

impacts to environmental, socioeconomic, and historic resources, as compared to the Proposed Route, largely due to their use of new ROW for a majority of their respective lengths. Further, the alternative routes were determined to result in greater engineering challenges when compared to the Proposed Route.

VI. INFORMATION REQUIRED UNDER COMAR 20.79.04.04

A. General Description of the Physical, Biological, Aesthetic and Cultural Features and Conditions of the Site and Adjacent Areas

As described more fully in the Direct Testimony of Mary M. Grim, the Project area is home to forest resources, including within the C&O Canal National Historical Park, Dickerson Conservation Area, Banner Park, Monocacy NRMA, Sugarloaf Mountain, and Owens Park. Forest associations are ecological communities where trees are the most prevalent plants and are typically named according to dominant species. Associations typical of the Lower Piedmont region in Maryland are the Oak-Hickory Forest, Virginia Pine-Oak Forest, and White Pine/Northern Hardwood Forest. Potomac Edison consulted with Maryland Department of Natural Resources ("DNR") Wildlife and Heritage Service related to species of concern in the Project Area. Upon initial consultation, the Maryland DNR Wildlife and Heritage Service indicated on November 22, 2024 that the following floral species of concern potentially occur within the Project Area: valerian, Shumard oak, white trout lily, starflower Solomon's-plume, goldenseal, sweet-scented Indian-plantain, primrose-willow, limestone wild petunia, potato dwarf-dandelion, veined skullcap, and rough flatsedge.

The central and western regions of Maryland contain an assortment of wildlife habitat ranging from mountainous, hardwood forests in the west to flat, open agricultural and intermittent wooded areas in the Piedmont to the east. A variety of wildlife species are found throughout these habitats, including several species of common game mammals and birds. Common species in the

Project area include white-tail deer, black bear, raccoon, striped skunk, eastern gray squirrel, and several other small furbearers. In addition to birds commonly found in Maryland, including grassland species, several deciduous forest bird species such as wood thrush, Acadian flycatcher, scarlet tanager, Louisiana waterthrush, and eastern wood-pewee can be found throughout the Project Area. Common amphibian species within the Project Area include red-spotted newt, northern two-lined salamander, eastern red-backed salamander, gray treefrog, wood frog, eastern American toad, and American bullfrog. Reptile species include eastern box turtle, stinkpot, eastern fence lizard, eastern gartersnake, northern black racer, five-lined skink, and northern copperhead. Common species of fish, including species stocked in streams and ponds by Maryland DNR, also reside in water resources within the Project Area.

Potomac Edison consulted with Maryland DNR Wildlife and Heritage Service, and the following rare, threatened, or endangered wildlife species are listed as potentially occurring within the Project Area: green floater, brook floater, creeper, Chesapeake snaketail, rapids clubtail, northern long-eared bat, roundtop amphipod, Pizzini's Cave amphipod, Potomac amphipod, Vandel's Cave amphipod, and Appalachian spring snail. Additionally, Maryland DNR Wildlife and Heritage Services identified the following habitat areas of concern: Lock 29 floodplain, Maryland Route 28 Southeast to just past Chick Road, Chick Road Springs, Monocacy Spring, Three Spring Hollow, and Chilton Woods. In these areas, Maryland DNR requested the avoidance of activities with the potential to impact the hydrology or to result in permanent loss of forest. Consultation with Maryland DNR Wildlife and Heritage Services is ongoing to identify the need for species surveys or protection measures to avoid or minimize impacts to wildlife species and their habitats.

B. Summary of the Environmental and Socioeconomic Effects of the Construction and Operation of the Project

The Applicant conducted a review of potential environmental impacts on geology and soils, aquatic resources, land use, wildlife, cultural resources, and aesthetics. Assessments conducted as part of the review examined impacts on historical, institutional, recreational, aesthetic, wildlife management, stream, wetland, park, and forest areas. The impact of the proposed Project on these areas will be minimal because the Project will utilize existing ROW for the majority of its length. Utilizing previously disturbed areas already associated with existing transmission line infrastructure will reduce impacts to the surrounding environment. No significant impacts to environmental resources are expected, and temporary impacts will be mitigated both during construction and after construction is completed. Moreover, the expanded ROW to be acquired will be located in sparsely populated rural, agricultural, and industrial areas and, therefore, impacts associated with the expanded ROW are also expected to be minimal. Locations for transmission line structures and temporary access roads will be selected to avoid wetlands and high-value environmental resource areas to the extent possible. In addition, the Applicant has conducted outreach regarding the proposed route, including consultations with federal, State, and local agencies and officials regarding potential impacts.

Although consultation with Maryland DNR is ongoing, impacts to wildlife and habitat are anticipated to consist of temporary disturbance due to construction activities, as well as the minimal disturbance typically associated with ROW maintenance. Maintenance of the ROWs will often mimic natural disturbances in the environment and create early successional habitats that are beneficial to certain species of flora and fauna. The ROWs provide foraging and nesting habitat for edge-adapted species, rare plant refugia, nesting and hunting sites for raptors, botanical diversity for invertebrate species, and other advantages. These ROWs are occasionally home to

threatened and endangered species because of the limited presence of this type of habitat in surrounding areas. Potomac Edison has also coordinated with the U.S. Fish and Wildlife Service ("USFWS") through its online system, which indicates that bald eagles and golden eagles have been reported within the Project area, with one confirmed active bald eagle nest along the Tuscarora Creek, approximately 330 feet southwest of the existing ROW. Consultation with the USFWS is ongoing to identify potential needs for additional surveying, permit authorizations, or protection methods to minimize impacts to these species.

Hydrology for the Project Area includes the tributaries of Tuscarora Creek, Washington Run, C&O Canal, Little Monocacy River, Monocacy River, and Potomac River. Stream and wetland delineations conducted within the Project ROW, access roads, and work areas in August and November 2024 and January, February, April, May, June, and July 2025 resulted in the identification of 77 streams and 63 wetlands. There are approximately 11,903 linear feet of streams and 4.6 acres of wetland located within the Project corridor. Additionally, there are approximately 8.5 acres of wetland buffer within the Project corridor. No Maryland DNR Wetlands of Special State Concern were identified within the Project corridor that would require expanded wetland buffers. Potomac Edison anticipates that most wetlands and streams in the Project Area will be avoided during construction. Streams within the existing ROW will remain unchanged, and temporary impacts from construction will be mitigated through compliance with the Maryland Stormwater Management Act and the Maryland Standards and Specifications for Soil Erosion and Sediment Control regulations regarding stormwater management.

With respect to socioeconomic effects, Potomac Edison anticipates that the tax base in Frederick and Montgomery Counties will increase slightly from Potomac Edison's additional investment. The real estate property tax for the calendar year following the in-service date of the

Gore-Doubs-Goose Creek Improvements Project is estimated to be approximately $1,291,000. In addition, because the construction workforce is expected to be modest during peak construction periods, Potomac Edison expects only a small increase in associated taxes and spending. Further information regarding the environmental effects of construction and operation of the Project is provided in the Direct Testimony of Mary M. Grim and the Direct Testimony of Lawrence J. Peterson. Further information regarding socioeconomic effects is provided in the Direct Testimony of Jeffrey P. Irons.

C. A Copy of All Studies of the Environmental Impact of the Project

The Environmental Review Document and the Wetland Delineation and Stream Identification Report are included in the Direct Testimony of Mary M. Grim as Exhibit MMG-3 and Exhibit MMG-5, respectively. The Alternative Route Analysis is included in the Direct Testimony of Lawrence J. Peterson as Attachment 2.

D. A Statement of the Ability to Conform to Applicable Environmental Standards

Potomac Edison confirms that it has the ability and will conform to the applicable environmental requirements. A list of anticipated permits and approvals for the Project is included in the Direct Testimony of Mary M. Grim, Exhibit MMG-8.

VII. PUA § 7-209 ALTERNATIVES TO CONSTRUCTION OF TRANSMISSION LINES

As described in the Direct Testimony of Jacquelyn L. Lojek, Potomac Edison considered the following alternatives to the Project:

Potomac Edison considered local reliability enhancements through reconductoring the existing transmission lines and upgrading transmission facilities at multiple existing substations. However, the identified thermal and reactive criteria reliability violations are of such severity that local and existing transmission facilities upgrades could not solve them. New transmission lines,

including the Project that is the subject of this CPCN Application, are required to maintain system reliability under forecasted system conditions.

One alternative to the proposed Project included building a new Meadow Brook-Pruntytown 500 kV Transmission Line for approximately 50 miles, a new Meadow Brook-Doubs 500 kV Transmission Line for approximately 55 miles, and a single-circuit Fort Martin-Doubs 500 kV Transmission Line for 158 miles on common towers crossing Virginia, West Virginia, and Maryland. A second alternative included the Meadow Brook-Pruntytown and Meadow Brook-Doubs lines, as well as a double-circuit Fort Martin-Doubs line. Both options require substation expansions and upgrades at Doubs Substation in Maryland; Fort Martin, Bedington and Pruntytown Substations in West Virginia; and Meadow Brook Substation in Virginia. These alternative proposals were submitted to PJM; however, PJM ultimately selected the Project subject to this CPCN submission.

VIII. SUPPORTING DOCUMENTATION

Attached to and made a part of this Application are the Direct Testimony and exhibits of the following witnesses:

Scott M. Humphrys, Supervisor, Transmission Siting at FirstEnergy Service Co., provides an introduction of Potomac Edison's seven witnesses, summarizes how the Project meets Maryland's regulatory requirements, describes Potomac Edison's outreach to the public.

Andrew Gledhill, Manager of Resource Adequacy, System Planning Division, PJM, describes PJM's Load Forecasting Process and explains the specific long-term load forecasts on which PJM relied in the 2022 RTEP analysis leading to the 2022 Window 3 Competitive Solicitation Process.

Sami Abdulsalam, Ph.D., P.Eng., Director of Transmission Planning, PJM, describes the PJM RTEP process, explains PJM's 2022 Window 3 Process, and details 2022 Window 3 reliability criteria violations as they pertain to the justification of the need for this Project.

Jacquelyn L. Lojek, Manager, Transmission Planning in the Transmission Planning and Protection Department at FirstEnergy Service Co., identifies the electrical need for the Project, its benefits, the consequences of deferring the Project and describes the alternatives to the Project that were considered.

Mary M. Grim, Staff Scientist, FirstEnergy Service Co., provides the environmental studies and coordination efforts for the environmental conditions along the Project corridor in Maryland, sponsors the permit matrix applicable to the Project's site, and sponsors several copies of environmental studies conducted for the Project.

Jeffery P. Irons, Supervisor of Transmission Line Design at FirstEnergy Service Co., describes the design and engineering for the Project; its safety and design standards (including the Project's ability to withstand extreme weather); the Project's costs and estimated costs for the alternative routes considered; how the Project will be constructed; Potomac Edison's plans for operating and maintaining the proposed transmission line after it is constructed, including removing and controlling vegetation.

Lawrence J. Peterson, Senior Environmental Manager in GAI's Power Delivery-Environmental Business Sector, describes the principal elements of the siting analysis completed for the Gore-Doubs-Goose Creek Improvements Project, including an analysis on alternative routes considered, and an overview of the environmental review and permitting requirements for the Project.

Lisa Marinelli, Senior Real Estate Representative, FirstEnergy Service Co., provides a description of the existing property rights related to the construction of the Project, identifies the potentially affected landowners and properties, and describes the code of conduct applicable to the Company's employees, agents, contractors, and subcontracts in their respective interactions with impacted property owners.

Justin P. Marx, Manager, Transmission Rates, FirstEnergy Service Co., provides an overview of the determination and allocation of revenue requirements associated with the Project and an estimate of the Project's impact on customers' bills.

IX. PROJECT'S SATISFACTION OF FACTORS UNDER PUA § 7-207

The above-referenced testimony, together with the Application, fully satisfies the requirements of Md. Code Ann., Pub. Util. Art. § 7-207 and COMAR 20.79.04. Specifically, the Project meets all factors that the Commission is required to consider in evaluating a transmission line CPCN application under PUA § 7-207.

A. PUA § 7-207(e)(1): Recommendation of Governing Bodies of Each County or Municipal Corporation Where Proposed Transmission Line is To Be Located

FirstEnergy's Local Engagement Specialist began outreach with public officials in the counties and townships within the Project area in May 2025. Follow-up communications notified public officials of the date for the public engagement meeting held on June 11, 2025, and invited

the officials to attend. In addition, FirstEnergy's Local Engagement Specialist provided the public officials with a courtesy copy of the landowner letter and fact sheet for the Project.

B. PUA § 7-207(e)(2): The Effect of the Transmission Line on (i) the Stability and Reliability of the Transmission System; (ii) Economics; (iii) Esthetics; (iv) Historic Sites; (v) Aviation Safety; and (vi) Air and Water Pollution

Please see Section III of this Application, supra, for a description of factors (i) and (ii) of PUA § 7-207(e)(2). Section VI of this Application, supra, addresses factors (iii) through (vi) of PUA § 7-207(e)(2). A detailed description of the resources in the Project's site and vicinity, including the Applicant's plan to use best management practices to control dust and construction vehicle equipment to minimize the temporary impacts on air quality, is provided in the Direct Testimony of Mary M. Grim and the Direct Testimony of Lawrence J. Peterson, both attached to this Application.

C. PUA § 7-207(e)(3): The Effect of Climate Change on the Overhead Transmission Line Based on the Best Available Scientific Information Recognized by the Intergovernmental Panel on Climate Change

As described in the Direct Testimony of Jeremey P. Irons, the Project will use the best available design specifications and materials to withstand severe climate and weather conditions. All structures are designed utilizing the 2023 National Electrical Safety Code ("NESC"), including the NESC Rule 250B "Heavy Loading" condition and Rule 250C "Extreme Wind Loading" condition. In addition to the NESC mandated load cases, Potomac Edison applies various other load cases for ice accumulation and wind speeds greater than those required by the NESC. All structures will be protected from lightning strikes through the use of the OPGW shield wires located above the phase conductors. The OPGW shield wires will be bonded to each structure to provide a proper path to ground in the event of a lightning strike on these facilities.

D. PUA § 7-207(f)(1): The Need to Meet Existing and Future Demand for Service

Section III of this Application provides an overview of the need for the transmission line to meet existing and future demand for service. The Direct Testimony of Dr. Sami Abdulsalam provides details on the PJM 2022 Window 3 process documenting the need for improvements to Maryland's transmission system. The Direct Testimony of Jacquelyn L. Lojek provides a detailed description of the need for the Project.

E. PUA § 7-207(f)(2): The Commission Shall Require as an Ongoing Condition of the CPCN That an Applicant Comply with: (i) All Relevant Obligations Imposed by PJM Interconnection LLC; and (ii) All Obligations Imposed by NERC and FERC

Potomac Edison agrees to comply with (i) all relevant agreements with PJM, or its successors, related to the ongoing operation and maintenance of the overhead transmission lines; and (ii) all obligations imposed by the NERC and the Federal Energy Regulatory Commission ("FERC") related to the ongoing operation and maintenance of the overhead transmission lines.

F. PUA § 7-207(f)(3): The Commission Shall Require the Applicant to Identify Whether the Transmission Line is to be Constructed on: (i) An Existing Brownfields Site; (ii) Property That is Subject to an Existing Easement; or (iii) A Site Where a Tower or Structure to Support an Overhead Transmission Line Exists

As described in the Direct Testimony of Jeffrey P. Irons, the Project will mostly utilize existing ROW that is the site of existing transmission lines, with the exception of a 1.8-mile segment of expanded ROW to be acquired. *See* also the Direct Testimony of Lisa Marinelli.

G. PUA § 7-207(g)(1): The Commission May Not Authorize the Construction of an Overhead Transmission Line unless the Federal Aviation Administration and the Maryland Aviation Administration determine the Construction will Not Constitute a Hazard to Air Navigation

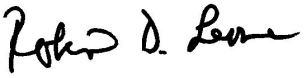
As described in the Direct Testimony of Jeffrey P. Irons, all structures that exceed any obstruction standard contained in 14 CFR Part 77 of FAA Advisory Circular 70/7460-1M, or an

overall height of 200 feet above ground level, will be filed with the FAA. While final determinations have not been made by the FAA, it is anticipated that lighting and/or marking will be required at various locations for this Project. Potomac Edison will confirm with the Federal Aviation Administration that the operation of the line does not create a hazard for air navigation for public airports and will seek the appropriate review and documentation from the Maryland Aviation Administration on the same.

X. CONCLUSION

Completion of the Project to accommodate the earliest in-service date of December 31, 2031 is required to assure the reliability of Potomac Edison's regional transmission system, including within Frederick and Montgomery Counties, and to increase the ability to move electricity into Maryland. Based on the foregoing, Potomac Edison respectfully requests that the Commission issue a Certificate of Public Convenience and Necessity to Potomac Edison for the Gore-Doubs-Goose Creek Improvements Project, as set forth in this Application, and grant such additional authorizations, waivers, approvals, and other relief as may be necessary to permit the Project to commence.

Respectfully Submitted,



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VERIFICATION REQUIRED BY COMAR 20.79.02.01

State of West Virginia)
)
City of Fairmont)

I, James H. Myers, President of The Potomac Edison Company ("Potomac Edison" or the "Company"), on behalf of the Company, being duly sworn, affirm that the matters and facts set forth in the Application Of The Potomac Edison Company For A Certificate Of Public Convenience And Necessity For The Gore-Doubs-Goose Creek Improvements Project are true and correct to the best of my information, knowledge, and belief.

James H. Myers, President, The Potomac Edison Company

Taken, sworn to and subscribed before me this 25 day of March, 2026.

Notary Public

My commission expires on the 25 day of March, 2024

OFFICIAL SEAL
NOTARY PUBLIC
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My Commission Expires September 5, 2026

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, pursuant to COMAR 20.79.02.02 and Md. Code Ann., Pub. Util. § 7-207(c), the foregoing Application of The Potomac Edison Company for a Certificate of Public Convenience and Necessity was forwarded via email, or by U.S. mail if an email address was not available, to the following:

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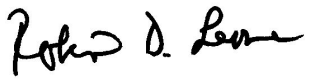

Robin D. Leone

Pursuant to Md. Code Ann., Pub. Util. § 7-207(c) and COMAR 20.79.02.02, a letter notifying all owners of land or owners of adjacent land of the foregoing Application of The Potomac Edison Company for a Certificate of Public Convenience and Necessity, the template of which is attached hereto, will be provided to the following via U.S. first-class mail, postage prepaid, upon assignment of a Maryland Public Service Commission case number to this matter.

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Via First-Class Mail March __, 2026

BEFORE THE MARYLAND PUBLIC SERVICE COMMISSION

Case No. ____

In the Matter of the Application of The Potomac Edison Company for a Certificate of Public Convenience and Necessity to Construct the Gore-Doubs-Goose Creek Improvements Project in Frederick and Montgomery Counties, Maryland

Pursuant to Public Utilities Article Section 7-207(c) of the Annotated Code of Maryland and Code of Maryland Regulations Section 20.79.02.02B, The Potomac Edison Company ("Potomac Edison") hereby provides you with notice of Potomac Edison's filing with the Maryland Public Service Commission ("PSC") on March 27, 2026, of an application for a Certificate of Public Convenience and Necessity ("CPCN") requesting authorization to add two 500 kV transmission lines to existing right-of-way located in Frederick and Montgomery Counties, Maryland; to modify existing transmission lines; and to construct related improvements, including connections to substation facilities.

A copy of the Application is available for inspection on the PSC's website, www.psc.state.md.us, by clicking on the "Case/Maillog Search" link on the PSC website homepage (https://webpscxb.psc.state.md.us/DMS/home), entering "__####__" in the Search bar, and then clicking on the link to the Application filing (Docket Entry No. "1") in the docket for the above-captioned case.

A physical copy of the Application is also available for inspection and copying at the following public libraries:

Urbana Regional Library
Frederick County Public Libraries
9020 Amelung Street
Frederick, MD 21704

Maggie Nightingale (Poolesville) Library
Montgomery County Public Libraries
19633 Fisher Avenue
Poolesville, MD 20837

For additional information about the Project, please visit the Project website at: https://www.firstenergycorp.com/about/transmission_projects/maryland/gore-doubs-goose-creek.html.

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Robin D. Leone