BEFORE THE
MARYLAND PUBLIC SERVICE COMMISSION

Application of The Potomac Edison Company for a Certificate of Public Convenience and Necessity to Rebuild the Messick Road-Ridgeley 138 Kilovolt Transmission Line in Allegany County, Maryland	* * * * * * *	Case No._____

APPLICATION OF THE POTOMAC EDISON COMPANY FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE MESSICK ROAD-RIDGELEY 138 KV TRANSMISSION LINE REBUILD PROJECT

October 3, 2025

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I. INTRODUCTION

The Potomac Edison Company ("Potomac Edison" or the "Company"),[1] a subsidiary of FirstEnergy Corp. ("FirstEnergy"), submits this application ("Application") for a Certificate of Public Convenience and Necessity ("CPCN") to rebuild the Maryland portion of the Messick Road-Ridgeley 138 kilovolt ("kV") transmission line to increase the current-carrying capability ("loadability") of the line (the "Project"). The Application is submitted in accordance with the Maryland Public Service Commission's ("Commission") authority under § 7-207 of the Maryland Annotated Code, Public Utilities Article ("PUA") and Title 20, Subtitle 79 of the Code of Maryland Regulations ("COMAR").

II. EXECUTIVE SUMMARY

The Project, which is needed to ensure the continued reliability of the transmission system in Maryland, consists of rebuilding approximately 4.0 miles of Potomac Edison's existing 138 kV transmission line that runs from Mineral County, West Virginia to Allegany County, Maryland to increase the loadability of the line and replace certain structures within the existing right-of-way ("ROW"). This Application only pertains to the Maryland portion of the Project, which is approximately 2.0 miles.[2]

The existing transmission corridor in Maryland currently contains a single-circuit 138 kV transmission line on 26 structures with a 556 Aluminum Conductor Steel Reinforced ("ACSR") conductor. The proposed Project involves replacing 12 and modifying one (1) of the existing structures, replacing the existing 138 kV circuit, installing new structures, and then installing a

[1] Potomac Edison is an electric company under Maryland law and is regulated by the Federal Energy Regulatory Commission ("FERC") as a public utility. *See* Md. Code Ann., Pub. Util. § 7-207(b)(3)(iii).

[2] On July 31, 2025, the Staff of the Public Service Commission of West Virginia issued a memorandum concluding that the Project does not require a certificate of convenience and necessity under West Virginia law.

new upgraded 138 kV circuit with a 954 kcmil 45/7 ACSR conductor. After the Project is constructed, the entire span of the Messick Road-Ridgeley 138 kV line will consist of the 954 kcmil 45/7 ACSR conductor,[3] which will increase the summer normal operating capacity of the rebuilt 138 kV transmission line to 376 MVA, providing increased capacity between the two substations.[4]

The Project is necessary to ensure continued reliable electric service in Maryland. As a Transmission Owner ("TO") in the PJM Interconnection, L.L.C. ("PJM") region, Potomac Edison is obligated to construct, operate, and own transmission facilities designated by PJM in its annual Regional Transmission Expansion Plan ("RTEP") process. As part of its 2021 RTEP Open Window 1 annual evaluation process, in which PJM studied the anticipated needs of the regional transmission system for the year 2026, PJM identified that the existing Messick Road-Ridgeley 138 kV line would become overloaded under certain operating conditions in violation of North American Electric Reliability Corporation ("NERC") reliability standards.[5]

In response, Potomac Edison designed the Project to prevent the reliability criteria violation identified by PJM. The Project was then submitted to PJM for its review and evaluation through the established RTEP process. After conducting the necessary series of RTEP studies, PJM

[3] The entire span of the Messick Road-Ridgeley 138 kV line is approximately 5.3 miles, consisting of approximately 3.2 miles in Allegany County, Maryland and approximately 2.10 miles in Mineral County, West Virginia. The current Project only involves rebuilding 4.0 miles of the existing line because 1.3 miles of the Messick Road – Ridgeley 138 kV line has already been upgraded to the 954 kcmil 45/7 ACSR conductor. The 1.3 miles of the Messick Road-Ridgeley 138 kV transmission line that already utilizes the 954 kcmil 45/7 ACSR conductor was designed and upgraded in approximately 1990 and 1998.

[4] Although the Project is a rebuild within existing ROW, the Company nevertheless considered alternative routes to determine whether other options existed that would provide better alternatives and minimize environmental and socioeconomic impacts than a rebuild project. The Company's alternatives analysis concluded that the rebuild option would be the least impactful approach.

[5] NERC reliability standards require that the bulk electric system be designed to operate within applicable thermal and voltage criteria limits, defined in FirstEnergy and PJM Planning Criteria, under various system loading conditions and in consideration of credible outages of elements on the bulk electric system.

confirmed that the Project addressed the identified reliability criteria violation. As a result, PJM selected the Project for inclusion in the RTEP as a "baseline" reliability upgrade.[6]

The FirstEnergy Transmission Planning Department has also determined that the Project will provide additional reliability and stability benefits beyond resolving the identified reliability criteria violation. For instance, the Project provides Potomac Edison's service area (primarily served from 500 kV transmission corridors) with increased operational flexibility to support local loads by providing additional transmission capacity that interconnects with local distribution substations in Maryland, which are vital for supplying power to industrial, commercial, and residential areas in Allegany County, Maryland. Additionally, by increasing the capability of the existing Messick Road-Ridgeley transmission corridor, the Project also enhances regional distribution of electricity and provides greater operational flexibility when the grid presents adverse system conditions or is met by planned and unplanned outages.

Potomac Edison now files this Application for Commission approval to construct the Project. In support of this Application, Potomac Edison includes the written direct testimony and supporting exhibits of five witnesses:

> **Travis M. Turner**, Engineer IV, Transmission Siting at FirstEnergy Service Company ("FirstEnergy Service Co."), provides an introduction of Potomac Edison's four witnesses, summarizes how the Project meets Maryland's regulatory requirements, describes Potomac Edison's outreach to the public, and provides the estimated capital cost and annual operating cost for the Project.
>
> **Jacquelyn L. Lojek**, Manager, Transmission Planning of the Transmission Planning and Protection Department at 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. She also describes the FirstEnergy Transmission Load Connection Process and the PJM RTEP process.

[6] A baseline reliability upgrade includes regional and subregional RTEP projects and is driven by ensuring market efficiency criteria, public policy needs, or operational performance requirements (such as fixing congestion issues, short circuit currents, bus voltage drops, and line overloads).

Morgan W. Meehan, Engineering Supervisor – Transmission Line Design Group, FirstEnergy Service Co., describes the design and engineering for the Project, its safety and design standards, a description of the right-of-way clearance, preparation, and maintenance, as well as the Project's construction activities and impacts, including vegetation maintenance activities and practices.

Amy M. Ruszala, Supervisor of Transmission Permitting, FirstEnergy Service Co., describes the route evaluation process, provides a description of the environment and land use features, including any potential impacts to these features, and describes the visual impact of the Project, sponsors the permit matrix applicable to the Project's site, provides an overview of agency outreach and correspondence, and sponsors copies of environmental studies conducted for the Project, including **Attachment 1** to the Application, which is the Project's Environmental Review Document.

Justin P. Marx, Manager, Transmission Rates and Regulatory Affairs, 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.

As noted above, **Attachment 1** to the Application contains the Project's Environmental Review Document ("ERD").

The Project's projected in-service date is June 15, 2028. If this Application is granted, the Company anticipates needing to begin construction of the Project on or about September 30, 2027 to meet the in-service date. After consideration of this Application and the supporting testimony and exhibits, the Applicant respectfully requests that the Commission approve this Application.

III. PURPOSE AND JUSTIFICATION OF PROJECT UNDER COMAR 20.79.04.01

As required by COMAR 20.79.04.01, the information presented below shows the need for the Project, justification for the Project, consequences of not approving the Project, and cost-effectiveness of the Project, as well as the Project's impact on the economies of the State.

A. An Explanation of the Need for the Project in Meeting Demands for Service.[7]

The Project is needed to meet the demands for service in Maryland and the surrounding region. The Messick Road-Ridgeley 138 kV transmission line corridor serves regional demand needs for Allegany County, Maryland and Mineral County, West Virginia. As discussed in the Direct Testimony of Jacquelyn L. Lojek, PJM identified projected thermal violations of the existing Messick Road-Ridgeley 138 kV transmission line under NERC Category P2 conditions.[8] The NERC Category P2 contingency was identified following a faulted 500 kV circuit breaker at Bedington Substation, creating an outage on the Bedington-Black Oak 500 kV transmission line. The FirstEnergy Transmission Planning Department reviewed and verified this violation. This Project resolves the identified NERC Category P2 violation and increases loadability for the Messick Road-Ridgeley transmission corridor and the customers served by this line, and supports Potomac Edison's broader 138 kV transmission system.

B. A Description of the Effect of the Project on System Reliability and Stability.[9]

By increasing the loadability of the line, the Project helps assure future reliability of Potomac Edison's transmission system and allows additional transmission capacity into Maryland. Because the Company's 138 kV transmission lines connect Extra High Voltage ("EHV") transmission substation to local distribution substations, the Messick Road-Ridgeley transmission corridor is vital for supplying power to industrial, commercial, and residential customer needs and areas over medium distances. The Project also enhances the stability of the grid by providing

[7] *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").

[8] NERC Category P2 contingencies are events resulting in the loss of multiple transmission elements; a NERC P2 contingency is a faulted circuit breaker.

[9] *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").

greater operational flexibility that will assist both PJM (as the transmission grid operator) and Potomac Edison (as the transmission owner) in withstanding and recovering from planned and unplanned disruptions. As such, the Project would enhance system reliability and stability of the transmission system that serves Maryland, including the approximately 4,300 customers in Allegany County, Maryland that are served through the Messick Road Substation.

C. Description of the Consequences if the Project is Not Approved.[10]

As described in the Direct Testimony of Jacquelyn L. Lojek, if the Project does not proceed as planned, the reliability of Potomac Edison's 138 kV transmission system network serving Allegany County and the surrounding area will be at risk due to compromised infrastructure, decreased transmission capacity, and decreased reliability of transmission service in Maryland.

D. An Explanation of the Cost Effectiveness of the Project, Including an Estimate of Capital Cost and Annual Operating Cost.[11]

The estimated total cost of the Project, including proposed upgrades in Maryland and West Virginia, is approximately $17,883,000.[12] Of this cost, approximately $9,024,000 is the total approximate cost in Maryland. The estimated operating cost for the Maryland portion is approximately $961,000.[13]

Information regarding the cost-effectiveness of the Project is discussed more fully in the Direct Testimony of Travis M. Turner and the Direct Testimony of Jacquelyn L. Lojek. As

[10] *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").

[11] *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").

[12] Of the approximate $17,883,000, total approximate cost in West Virginia is $8,859,000.

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

described in the Direct Testimony of Amy M. Ruszala, by utilizing the existing transmission corridor through a rebuild project, the Project lowers (i) the footprint of socioeconomic and environmental impacts, and (ii) purchase costs related to acquiring property rights for the Project, as well as related legal and permitting costs.

E. A Description of the Impact of the Project on the Economies of the State.[14]

The Project will positively contribute to the economies of the State by among other things, helping ensure the reliability of Maryland's transmission system and the continued reliable provision of electric service to Maryland customers. Furthermore, as described in detail in the Direct Testimony of Travis M. Turner, the Company expects that Allegany County, Maryland will benefit economically. The real estate property tax for the Project is estimated to be approximately $68,440.[15] As addressed in the Direct Testimony of Morgan W. Meehan, Potomac Edison expects a small increase in taxes and spending associated with the estimated 10-25 employees required for the Project's construction workforce. Finally, the Direct Testimony of Justin P. Marx provides an overview of the Project's current estimated retail rate impact on Maryland customers ($0.04 per month).[16]

IV. DETAILED DESCRIPTION OF PROJECT UNDER COMAR 20.79.04.02

As required by COMAR 20.79.04.02, the information presented below describes in detail the features of the Project.

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[14] *See* COMAR 20.79.04.01A(5) (An application for a proposed transmission line or modification to an existing transmission line shall include a "description of the impact of the project on the economies of the State").

[15] This estimate is calculated based on the approximate taxes due in the year after the in-service date and differ from the actual property tax levied on Potomac Edison because of several factors such as values of real and personal property, operating income, and other factors.

[16] The Direct Testimony of Justin P. Marx also outlines the cost-allocation methodology in accordance with the PJM Operating Agreement for regional projects set forth in Schedule 12 of the Open Access Transmission Tarriff ("OATT").

A. COMAR 20.79.04.02A: Description of Engineering and Construction Features of the Project.

A complete description of the engineering and construction features of the Project, including a comparison of the current transmission line design specifications and correspondence changes is contained in the Direct Testimony of Morgan W. Meehan attached to this Application. The Project rebuilds the existing single-circuit 138 kV transmission line to increase loadability by upgrading the existing 138 kV conductors on similarly configured wood poles or steel structures. An overview of the construction and engineering features in accordance with COMAR 20.79.04.02A follows herein.

COMAR 20.79.04.02A: Engineering and Construction Features	
(1) Width, Length, and Total Acreage of the Right-of-Way in Maryland	Approximately 2.0 miles of 100-foot right-of-way ("ROW") | 24.2 acreage in total
(2) Line Voltage	138 kV
(3) Number of Circuits	Single Circuit
(4) Number of Circuits per structure	One Circuit per structure
(5) Structure Type and Dimensions	Self-supporting horizontal H-frame wood structures (**Exhibit MWM-1**); Dead End/Strain Horizontal 27-90-degree three pole wood structures (**Exhibit MWM-2**); and Dead End/Strain horizontal 0-3-degrees angle three pole wood structures (**Exhibit MWM-3**), approximately 77 feet based on current preliminary line design.
(6) Conductor Configuration and Size	954 KCM, 45/7 aluminum conductor, steel reinforced ("ACSR"), also known as "rail"
(7) Nominal Capacity (MVA)	376 MVA

(8) Nominal Length of Span between Structures	700 feet (average span)

Right-of-Way Requirements

The Project utilizes the existing 100-foot-wide ROW along the Messick Road-Ridgeley transmission line corridor.

Proposed Line Design

The Project consists of rebuilding approximately 2.0 miles of a 138 kV transmission line in Maryland within existing 100-foot-wide transmission ROW.[17] The Project uses similar design configurations for the wood pole structures and self-supporting steel structures to those that are currently used in the existing transmission corridor, but for changes in the height of the structures.

Design Features and Construction Safety Practices

The Project is designed to meet or exceed National Electrical Safety Code ("NESC") requirements. NESC requirements informed the choice of line tension, which will be 40% of the conductor's rated breaking strength for the loading distribution in this Project. The Project will also meet or exceed the conductor-to-ground clearances set by NESC, which are based upon terrain or land use features traversed by the existing transmission corridor. Porcelain or toughened glass insulators will be used for all structures in the Project. Furthermore, galvanized steel or aluminum will be used to support conductors through the full range of operating temporaries. Finally, the existing conductor transmission line shield wires will be replaced to seven (7) No. 8 Alumoweld (aluminum-clad) steel wires. Further details on design features, including conductor sag parameters, can be found in the Direct Testimony of Morgan W. Meehan.

[17] The Maryland and West Virginia components of the Project is approximately 4.0 miles.

Finally, project activities such as ROW clearing, pole foundation installation, and subsequent rehabilitation will conform to all applicable state requirements, as well as the appropriate permit forms submitted to the Maryland Department of the Environment and, as necessary, to Allegany County Conservation Districts for Approval. Potomac Edison will employ Good Utility Practice and efficient engineering design and construction practices in developing the Project.

Climate Change and Severe Weather Conditions[18]

In the last decade, incorporating strategies for climate resilience has become an important priority for businesses, states, and municipalities. PUA § 7-207(e)(3) requires the Commission to give due consideration to the effects of climate change on an overhead transmission line based on the best available scientific information recognized by the Intergovernmental Panel on Climate Change, prior to taking final action on an application.

Extreme weather events due to climate change are anticipated to influence the reliability of overhead transmission lines. The changes in the frequency and/or intensity of these wind and/or ice events could impact the different structural components of the transmission line. As provided in Section 7 of **Attachment 1** (Environmental Review Document) to this Application, the Company has designed the Project using 2023 NESC guidance that addresses loading and clearance requirements to support the structural components of the line, such as the weight of conductors and stress caused by the weight of ice and wind pressures. By integrating NESC clearances as such, the Project has been designed to account for safety of unknown or unanticipated

[18] *See* PUA § 7-207(e)(3) (The Commission must give due consideration to "the effect of climate change on the generating station, overhead transmission line, or qualified generator lead line based on the best available scientific information recognized by the Intergovernmental Panel on Climate Change.").

contingences. For example, all structures will be protected from lightning strikes by using shield wire and optical guide wires located above the phase conductors.

Vegetation Management

The Direct Testimony of Morgan W. Meehan provides a detailed description of the vegetation plan for the Project ROW. The Project ROW will be maintained in accordance with FirstEnergy Service Co.'s Transmission Vegetation Management Program ("TVMP").

B. COMAR 20.79.04.02.B: Description of Property Acquired or Property Right to Be Acquired.

As described by Witness Ruszala, the Project will utilize the existing transmission line ROW associated with the existing 138 kV transmission infrastructure. Therefore, the Company will not need to acquire any property or property right to construct the Project.

C. COMAR 20.79.04.02.C: Description of Access Roads for Construction or Maintenance.

As described in the Direct Testimony of Amy M. Ruszala and identified in **Exhibit AMR-7** (Preliminary Access Mapping) to her testimony, construction access routes will be minimized to the extent possible. For example, the Company will use existing and proposed access roads within and adjacent to the ROW. When existing access roads are unsuitable for construction equipment in their present state, the Company will enhance or modify the access road with stone or timber matting to make them suitable. Environmental impacts such as direct impacts to streams are expected to be minimal or avoided by using temporary bridges and timber matting. At the completion of the Project, access roads will be restored to as near existing conditions as practicable. ROW clearances, maintenance, and restoration is described in the Direct Testimony of Morgan W. Meehan.

D. COMAR 20.79.04.02.D: Location and Identification of Sites from Which the Project Would Clearly Be Visible.

A Visual Simulation of the design changes of the Project has been prepared for the Project and is included as **Exhibit AMR-2** attached to Amy M. Ruszala's Direct Testimony. Features identified in the topographic and aerial maps for the Project (**Exhibit AMR-1** appended to the Direct Testimony of Amy M. Ruszala) were incorporated to the Visual Simulation report. As described by Witness Ruszala, the Company initiated and has continued coordination with the Maryland Historic Trust, National Park Service, amongst other entities to ascertain and mitigate the estimated moderate visual impacts of the Project. Details of the evaluation methodology for the Visual Simulation may be found in Section V of the Direct Testimony of Witness Ruszala. Overall, because the structures being replaced will remain within 5-15 feet from existing positions with only minor changes in height, visual impact is estimated to be low.

E. COMAR 20.79.04.02.E: Construction Within the 100-Year Floodplain.

As provided in the Direct Testimony of Amy M. Ruszala, the Messick Road-Ridgeley transmission corridor currently crosses the 100-year floodplain associated with the Potomac River as well as one (1) of its tributaries. The Company will secure applicable permits and approvals prior to construction. A table of the associated permits required for the Project may be found in **Table 5** (Anticipated Permits, Approvals, and Consultations) in **Exhibit AMR-5** (Tables) appended to the Direct Testimony of Witness Ruszala.

F. COMAR 20.79.04.02.F: Location and Identification of Public Airports Within One Mile of the Line.

There is one airport within 1 mile of the Project centerline in Maryland: the Mexico Farms Airport, located south of Wiley Ford, Maryland. As identified in the Direct Testimony of Amy M. Ruszala, The Greater Cumberland Regional Airport in Wiley Ford, West Virginia is also within 1 mile of the Project centerline. Nevertheless, the Company does not expect the Project will hazard

the airport's flight operations. To confirm this determination and ensure that regulations are followed, the Company has commenced communications with the Federal Aviation Administration which determined that the structures do not exceed obstruction standards and would not be a hazard to air navigation, as provided in **Exhibit AMR-3**. The Company also intends to file the appropriate documentation with Maryland Aviation Administration to ensure the Project complies with applicable regulations and project review.

G. COMAR 20.79.04.02.G: Depiction on Topographical Map

The required maps are included with this Application in the Direct Testimony of Amy M. Ruszala in **Exhibits AMR-1a** (Constraints Mapping – Topographic).

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

PUA § 7-209 and COMAR 20.79.04.03 require that for a new greenfield transmission line, the applicant must examine construction and routing alternatives, including the use of existing transmission line corridors. COMAR 20.79.04.03(B) states that "[f]or modifications to existing transmission lines," such as this rebuild Project, "alternative routes need not be evaluated." Even though these requirements do not apply to this Project, the Direct Testimony of Amy M. Ruszala provides an assessment of the development of potential and alternative routes. As Witness Ruszala explains, the Company evaluated the existing transmission corridor and two alternative routes. Routing constraints, such as required ROW width; available transmission structures; urban features (infrastructure, transportation facilities, potential hazardous waste issues); environmental features (streams, wetlands, forests); conservation areas (agricultural easements, historical sites, archeological sites); impacts to threatened or endangered species; visual aesthetics resources; and costs associated with the construction of a new ROW versus maintenance of an existing transmission corridor, were evaluated. In the Company's analysis, the alternative routes were

rejected in favor for the use of the existing 138 kV transmission corridor. The existing ROW reduces costs and environmental impacts associated with acquiring new property rights, access routes, and impacts to the increase in development in the surrounding area.

VI. ENVIRONMENTAL DESCRIPTION, IMPACT, AND PROPOSED MITIGATION PLAN INFORMATION FOR THE PROJECT UNDER COMAR 20.79.04.04

A. COMAR 20.79.04.04.A: General Description of the Physical, Biological, Aesthetic and Cultural Features and Conditions of the Site and Adjacent Areas.

The Direct Testimony of Amy M. Ruszala provides a general description of the physical, biological, aesthetic, and cultural features of the Project. Witness Ruszala's testimony also addresses the features and conditions of the Project site.

B. COMAR 20.79.04.04.B: Summary of the Environmental and Socioeconomic Effects of the Construction and Operation of the Project.

A detailed summary of the potential environmental impacts of the Project may be found in the Direct Testimony of Amy M. Ruszala and **Attachment 1** (Environmental Review Document) to this Application. Witness Ruszala also provides an overview of the socioeconomic effects of the construction and operation of the Project, and the Direct Testimony of Travis M. Turner provides an overview of the tax and labor impacts of the Project in Maryland.

C. COMAR 20.79.04.04.C: A Copy of All Studies of the Environmental Impact of the Project.

Attachment 1 (Environmental Review Document) and the corresponding exhibits to the Direct Testimony of Amy M. Ruszala listed below contain all copies of the studies regarding the Project's environmental impact:

Direct Testimony of Amy M. Ruszala	
Exhibit AMR-2	Visual Simulation of Line Changes
Exhibit AMR-5	Tables (including recreational and cultural resources, field

	delineated streams, field delineated wetlands, and prime farmland of statewide importance)
Exhibit AMR-6	Wetland Delineation and Stream Identification Report[19]
Exhibit AMR-8	Zoning Map

D. COMAR 20.79.04.04.D: A Statement of the Ability to Conform to Applicable Environmental Standards.

The Company confirms that the Project will conform to all applicable environmental requirements. A list of anticipated permits and approvals for the Project is attached as **Exhibit AMR-5** (Tables), **Table 5** (Anticipated Permits, Approvals, and Consultations) to the Direct Testimony of Amy M. Ruszala.

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

As described below, 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.

Potomac Edison reviewed the Project and permitting requirements with Allegany County agencies on May 1, 2024. The Company also notified and invited local and state public officials in Allegany County to a virtual public engagement meeting on September 17, 2024. The virtual public engagement meeting introduced the Project, informed attendees of the Project's description and need, and provided attendees with a fact sheet for the Project. As part of the virtual online engagement platform, attendees were provided the opportunity to review information and provide comments on the Project. In addition to the outreach described above, the Company engaged with state, local, and federal agencies by letter or online correspondence seeking review and input on

[19] The Wetland Delineation and Stream Identification Report is also contained in Appendix B of Attachment 1 (ERD).

the Project. A list and description of the input solicited is provided in the Direct Testimony of Amy M. Ruszala.

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 II** (Executive Summary) and **Section III** (Purpose and Justification of the Project) of this Application, *supra*, for a description of factors (i) and (ii) of PUA § 7-207(e)(2). **Section VI** (Environmental Information) 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 Company'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 Amy M. Ruszala and the Direct Testimony of Morgan W. Meehan, 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 previously described in **Section IV** (Detailed Description of Project) of this Application, the Project will use best available design specifications and materials to withstand severe climate and weather conditions, which is addressed in more detail in **Attachment 1** (ERD) to this Application.

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

Sections II (Executive Summary) and **III** (Purpose and Justification of the Project) of this Application provide an overview of the need for the transmission line to meet existing and future demand for service. 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 line; and (ii) all obligations imposed by the North American Electric Reliability Council ("NERC") and the Federal Energy Regulatory Commission ("FERC") related to the ongoing operation and maintenance of the overhead transmission line.

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 Amy M. Ruszala and provided in the maps appended to her testimony in **Exhibit AMR-1** (Constraint Mapping-Topographic and Aerial), the Project will wholly utilize its existing transmission corridor and ROW for the entire length of the Project.

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 **Section IV.F.** of this Application and the Direct Testimony of Amy M. Ruszala, the Company has confirmed 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.

VIII. GENERAL FILING REQUIREMENTS UNDER COMAR 20.79.01.06

A. COMAR 20.79.01.06A: Name of the Applicant.

The name of the Applicant is The Potomac Edison Company.

B. COMAR 20.79.06.01.B: Address of the Principal Business Office of the Applicant.

The address of the principal business office of Applicant is: 10802 Bower Ave, Williamsport, MD, 21795.

C. COMAR 20.79.01.06.C: Persons Authorized to Receive Notices and Communication.

The names, titles, addresses, and email addresses of the people authorized to receive notices and communications with respect to the Application are:

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D. COMAR 20.79.01.06.E: Location at Which a Copy of the Application May be Inspected by the Public

A copy of the Application will be filed with the Commission, and as such, it 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 (https://www.firstenergycorp.com/about/transmission_projects/maryland/messick-road-ridgeley.html). The public may also inspect a copy of this Application at the following library:

Allegany County – South Cumberland Public Library
100 Seymour St, Cumberland, MD 21502

E. COMAR 20.79.01.06.F: Local, State, and Federal Government Agencies Having Authority to Approve or Disapprove the Construction or Operation of the Project.

In addition to the certificate sought through the CPCN Application herein, the Company has provided a list of permitting authorities having oversight of the Project's construction in **Table 5** of **Exhibit AMR-5** (Tables) and a summary of the status of the permit approvals is provided in **Exhibit AMR-9** attached to the Direct Testimony of Amy M. Ruszala. Copies of the letters and responses received from local, state, and Federal government agencies may also be found in **Exhibit AMR-3**, attached to the Direct Testimony of Amy M. Ruszala, and **Appendix A** of **Attachment 1** (ERD) to this Application. All applicable permits and approvals required for the construction and operation of the Project will be obtained from these agencies.[20]

F. COMAR 20.79.01.06H: Information Required on Project Need and Justification for Transmission Lines.

Section III (Purpose and Justification of the Project) of this Application provides the required information under COMAR 20.79.04.01 for transmission line facilities.

G. COMAR 20.79.01.06I: Information Required on Project Description and Alternative Routes Considered.

The Project is a modification to an existing transmission line within an existing ROW. Therefore, the requirement to describe and evaluate alternative routes under COMAR 20.79.04.03 does not apply. Nevertheless, the Direct Testimony of Amy M. Ruszala and **Section V** of this Application provides an overview of the route selection and the alternatives analysis conducted by the Company.

[20] In addition to the entities provided above, the Pennsylvania portions of the proposed Project are the subject of a separate siting application filed with the Pennsylvania Public Utility Commission. *See supra* n.2.

H. COMAR 20.79.01.06.J: An Implementation Schedule for the Project.

The projected in-service date for the Project is June 15, 2028. To meet this in-service date, construction is scheduled to begin on or about September 30, 2027, pending Commission approval of the Application.

I. COMAR 20.79.01.06I: Environmental, Natural Resources, and Socioeconomic Information Required for Transmission Line Projects.

Section VI (Environmental Information) of this Application provides the required information under COMAR 20.79.04 for transmission line facilities.

IX. CONCLUSION

Based on the forgoing, Potomac Edison requests that the Maryland Public Service Commission review and approve this Application for a Certificate of Public Convenience and Necessity as in the public interest for the siting and construction of the Maryland portion of the Messick Road-Ridgeley 138 kV Rebuild Project, as described herein and in the supporting documents attached hereto and accompanying this Application, and grant any additional authorizations, waivers, approvals, or other relief as may be necessary to authorize the construction of the Project.

Respectfully Submitted,

/s/ C. S. Gunderson
Christopher S. Gunderson
Ananya G. Sinha
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Baltimore, Maryland 21202
(410) 244-5466
(410) 244-7742

csgunderson@venable.com
agsinha@venable.com

Attorneys for The Potomac Edison Company

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 Messick Road-Ridgeley 138 kV Transmission Line Rebuild Project are true and correct to the best of my information, knowledge, and belief.

James H. Myers

James H. Myers, President, The Potomac Edison Company

Taken, sworn to and subscribed before me this 30 day of September, 2025.

Stephanie A. Mezzapelle
Notary Public

OFFICIAL SEAL
NOTARY PUBLIC
STATE OF WEST VIRGINIA
Stephanie A. Mezzapelle
Mon Power
5001 NASA Blvd.
Fairmont, WV 26554
My Commission Expires September 5, 2026

My commission expires on the 5 day of September, 2026

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, pursuant to Md. Code Ann., Pub. Util. § 7-207(c) and COMAR 20.79.02.02, 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:

Commissioner David J. Caporale, President
Allegany Board of County Commissioners
Allegany County Complex
701 Kelly Road
Cumberland, MD 21502
Email: commissioner.caporale@alleganygov.org

Commissioner William R. Atkinson
Allegany Board of County Commissioners
Allegany County Complex
701 Kelly Road
Cumberland, MD 21502
Email: commissioner.atkinson@alleganygov.org

Commissioner Creade V. Brodie, Jr.
Allegany Board of County Commissioners
Allegany County Complex
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Cumberland, MD 21502
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James Senate Office Building, Room 416
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Washington, DC 20426

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Tina Cappetta, Superintendent
Chesapeake and Ohio Canal National Historic Park
142 W Potomac Street,
Williamsport, MD 21795
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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, was provided to the following via U.S. first-class mail, postage prepaid:

Bauer Self Storage
11307 Eastman Rd NE
Cumberland, MD 21502

Ricky L Bittinger
19810 Copperhead Drive
Rawlings, MD 21557

Donelly F Bohrer
10408 Hillcrest Dr NE
Cumberland, MD 21502

David T Cross Et Al
1015 Candoc Ln
Cumberland, MD 21502

Csx Transportation Inc
Tax Department
Jacksonville, FL 32202

Cumberland Economic Development Corporation
15 S Centre St
Cumberland, MD 21502

Cumberland Mayor And City Council
57 N Liberty St
Cumberland, MD 21502

Friends Aware Inc
1601 Holland St
Cumberland, MD 21502

Ronald-Julie Grabenstein
13310 Uhl Hwy SE
Cumberland, MD 21502

Janet E Graham Et Al
221 Potomac St
Cumberland, MD 21502

Richard E Grimm Jr Et Al
12620 Ruppenkamp Rd
Cumberland, MD 21502

John S Knippenberg Jr Et Al
12603 Knippenberg Rd Se
Cumberland, MD 21502

Local Union 307 Building Corporation
401 Decatur St
Cumberland, MD 21502

Gregory G Lowery
13217 Uhl Hwy
Cumberland, MD 21502

Alexander Miltenberger Et Al
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Cumberland, MD 21502

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Cumberland, MD 21502

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Cumberland, MD 21502

Gary Earl Shope Et Al
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Linda S Shope & Alan E Orndorff
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Cumberland, MD 21502

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Dennis Sponaugle Et Al
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/s/ C. S. Gunderson
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csgunderson@venable.com

Attorney for The Potomac Edison Company

Via First-Class Mail October 3, 2025

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 for the Messick Road-Ridgeley 138 kV Transmission Line Rebuild Project

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 October 3, 2025, of an application for a Certificate of Public Convenience and Necessity ("CPCN") to rebuild a single-circuit 138 kV overhead transmission line on the existing Messick Road-Ridgeley 138 kV transmission line in Allegany County, Maryland (the "Application") for the Messick Road-Ridgeley Rebuild Project (the "Project").

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 library:

Allegany County Public Library
South Cumberland Branch
100 Seymour St.
Cumberland, MD 21502

For additional information about the Project, please visit the Project website at: https://www.firstenergycorp.com/about/transmission_projects/maryland/messick-road-ridgeley.html.