

Jessica Fitzwater
County Executive



Brad W. Young
County Council President

FREDERICK COUNTY GOVERNMENT

September 4, 2024

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

RE: Frederick County Government Opposition to the Maryland Piedmont Reliability Project

Dear Chairman Hoover,

As the elected leaders of Frederick County Government, we are writing to inform the members of the Public Service Commission (PSC) of our strong opposition to the current proposals for the alignment of the new 70-mile 500kV transmission line from southern Pennsylvania to the Doubs substation in southern Frederick County.

We understand these proposals, put forth by the Public Service Enterprise Group (PSEG) are part of the large regional utility system upgrade, being undertaken by Pennsylvania-New Jersey-Maryland Interconnection (PJM). Ultimately, this upgrade is planned to address the long-term electrical needs of the entire region. As part of this effort, PSEG will need to file an application for the proposed transmission line alignment with the PSC for a Certificate of Public Convenience and Necessity (CPCN). Furthermore, we understand this application may be filed as soon as September, but most assuredly by the end of the calendar year.

As the elected representatives for the residents of Frederick County, we are compelled to express our concerns regarding the lack of public information justifying the full extent of the necessity for the new lines, the devastating effect this project will have on many residents in the Frederick County community, the potential use of eminent domain by the utility to complete the project in a more time efficient manner, and the apparent dismissal of the possibility of using existing rights of way (ROW) or collaborating with Baltimore Gas and Electric (BGE) to either reconstruct or “reconductor” the existing lines, thereby significantly reducing the impact in all the Maryland jurisdictions.

We recognize that Frederick County has no authority or role in the approval or denial of this project, but as the elected officials we have a responsibility to ensure the voices and concerns of our residents are heard and acknowledged. We understand the need to improve the resiliency and reliability of the regional power grid. However, the new transmission lines for the Maryland Piedmont Reliability Project (MPRP) as currently proposed, will directly and negatively impact current homes, businesses and farms (many of which are in agricultural preservation programs utilizing state and/or local funds), historical preservation sites, and will diminish the property values of thousands of Frederick County residents. Some impacts would severely curtail the use of the properties where people presently live and farm and could actually force people off of their properties altogether. In addition, all the proposed alignments will impact environmentally sensitive natural resource areas at a time when counties are required to protect them to

comply with federal and state law. Finally, these alignments will certainly threaten Frederick County's nascent but growing agritourism industry.

We have serious concerns about the use of eminent domain to expedite the completion of this project. The potential use of eminent domain strikes fear in the hearts of the community, frequently leads to the displacement of viable businesses and current residents and could seriously harm our farm community and the growing agritourism sector of our economy. There are numerous transmission lines already crisscrossing Frederick County. To dismiss the idea of locating the new lines within existing rights of way seems extremely shortsighted. Furthermore, discounting the concept of partnering with BGE to either reconstruct or "reconductor" the current existing lines without any discussion, seems even more shortsighted. Partnering with BGE to replace current transmission lines either with new twin monopole towers or with upgraded, more technologically advanced lines could allow roughly twice as much electricity to flow through the current ROWs without massive disruptions to the community – a potential win-win for all.

We fully support the PSC's public process that will occur before a CPCN can be issued. We support open, transparent and inclusive public processes, where the public has the right to be heard, and important information justifying the necessity of these types of utility system upgrades will be shared in a public forum. To date, the entire proposed upgrade project has been anything but open and transparent. The public only found out about the proposal through social media postings and word of mouth. There was little to no information from PJM or the PSEG to the public, even when the proposed transmission line alignments would directly impact a specific home or business. Information about the project itself, the justification for the upgrade, or any concern about its impact on residents by anyone with either PJM or PSEG has frankly been abysmal.

For these reasons and many more, we urge the PSC to deny PSEG's application for the MPRP when it is filed, if the issues raised in our letter dated August 8, 2024, to Mr. Kalwa and Mr. Gilroy which was forwarded to the PSC, have not been addressed. Moreover, we further urge the PSC to undertake the following:

1. Urge PJM to re-examine its approach to the transmission line alignments though this area and prioritize solutions that maximize the use of existing BGE ROW, consistent with PJM's recent decision (August 7, 2024) in the NextEra proposal in Loudoun County, VA, being built by First Energy, Dominion and Exelon.
2. Encourage PJM to collaborate with BGE to either reconstruct or "reconductor" the existing transmission line, to allow for more efficient use of the current ROW and infrastructure and less disruption for the residents.
3. Confer with the FERC to determine if PJM's award of the project to PSEG was done properly and in the public interest.
4. Engage with FERC to ensure that PJM's proposed application when submitted by PSEG complies with the requirements of FERC Order 1920, to ensure that the application accurately projects and anticipates the energy needs of the region, in accordance with Order 1920.

We thank you in advance for your consideration of our requests.

Respectfully,

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