

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF MARYLAND**

IN THE MATTER OF THE APPLICATION \*  
OF PSEG RENEWABLE TRANSMISSION, LLC \*  
FOR A CERTIFICATE OF PUBLIC \*  
CONVENIENCE AND NECESSITY TO \*  
CONSTRUCT A NEW 500 KV TRANSMISSION \*  
LINE IN PORTIONS OF BALTIMORE, \*  
CARROLL, AND FREDERICK COUNTIES \*

CASE NO. 9773

\* \* \* \* \*

**MOTION TO DISMISS  
BY FREDERICK COUNTY, MARYLAND**

Frederick County, Maryland, a body corporate and politic of the State of Maryland ("Frederick County") by its undersigned attorneys files this Motion to Dismiss the Application filed by PSEG Renewable Transmission, LLC ("PSEG") for a Certificate of Public Convenience and Necessity ("CPCN") to construct the Maryland Piedmont Reliability Project ("MPRP") in the above-captioned matter. In support of this Motion, Frederick County states as follows:

1. On October 28, 2025, The Maryland Farm Bureau, *et al.*, filed its Motion to Dismiss the Application for a CPCN filed by PSEG in the above captioned matter. (ML 323746)
2. Frederick County supports the Motion to Dismiss filed by The Maryland Farm Bureau, *et al.*, for the reasons set forth therein.
3. Frederick County hereby adopts and incorporates by reference the Motion to Dismiss filed by The Maryland Farm Bureau, *et al.*, (ML 323746) into this Motion to Dismiss, as if fully set forth herein.
4. If the reliability concerns and projected system failures asserted by the applicant are accurate, then it is incumbent upon PJM and the owners of the existing utility infrastructure to manage the future demands upon its systems by aggressively pursuing improvements and rationed allocation of its limited resources to avoid harm to existing users.

## CONCLUSION

Frederick County, Maryland respectfully requests that the Commission Dismiss the Application for a CPCN filed in this matter for the construction of Maryland Piedmont Reliability Project (“MPRP”).

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 6<sup>TH</sup> day of November, 2025, a copy of the foregoing Motion to Dismiss filed by Frederick County, Maryland was sent via electronic service to all members of the Service List in Case No. 9773 dated July 3, 2025.

  
Joshua S. Brewster, Senior Asst. County Attorney