

**BEFORE THE PUBLIC SERVICE
COMMISSION OF MARYLAND**

IN THE MATTER OF THE APPLICATION OF *
PTR HOLDCO, LLC FOR A CERTIFICATE OF *
PUBLIC CONVENIENCE AND NECESSITY *
TO CONSTRUCT A 30.0 MW SOLAR * Case No.
PHOTOVOLTAIC GENERATING FACILITY *
IN HARFORD COUNTY, MARYLAND

* * * * *

**APPLICATION OF PTR HOLDCO, LLC
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY**

PTR HoldCo, LLC (the “Applicant”), by its undersigned counsel, hereby submits this Application to the Maryland Public Service Commission (the “Commission”) for a Certificate of Public Convenience and Necessity (“CPCN”) to construct a 30.0 megawatt (“MW”) alternating current (“AC”) generating capacity solar photovoltaic facility (“PV”) in Harford County, Maryland (“Fairview Farm Solar Project” or “Project”) pursuant to Md. Public Utilities Article (“PUA”) § 7-207.

The Application is comprised of this petition together with the attached Environmental Review Document (“ERD”) and associated appendices. Section I of this petition provides an overview of the Project; Section II justifies the Commission’s approval of the application; and Section III summarizes the information required by PUA § 7-207 and COMAR 20.79.01.04.¹

¹ PUA § 7-208(c) requires an applicant to provide notice two years prior to construction of a generating station and an associated overhead transmission lines designed to carry a voltage in excess of 69,000 volts unless the Commission waives the two-year notice requirement. The two-year notice requirement does not apply to the Application because the Project’s interconnection facilities are not designed to carry in excess of 69,000 volts.

I. PROJECT INTRODUCTION

The Fairview Farm Solar Project is a 30.0 MW AC solar PV project involving a limit of construction of approximately 150 acres consisting of two components: (1) a solar PV array within Tax Map 50, Parcel 83 (the “Site”) and (2) two interconnection lines taps on 33 kV circuits along Calvary Road.

The Project will involve a capital investment of approximately \$55 to 60 million and create up to 100 temporary design, management, and construction jobs working remotely or on the site at the height of construction. Construction is expected begin in the second quarter of 2021, subject to permitting restrictions. Because of the nature of solar installations, environmental and land use impacts from the Project will be minimal and the long-term benefits significant.

Maryland has established one of the most aggressive renewable portfolio standard requirements in the country, mandating that 50% of its power be covered by renewable energy credits by 2030, including 14.5% from solar connected to the electric system serving Maryland by 2028. In order to meet these goals Maryland needs not only small rooftop installations, but large utility-scale facilities like the Fairview Farm Solar Project. This is the first utility-scale solar facility permitted in the Baltimore Gas and Electric (“BGE”) service territory.

In summary, there are compelling economic, environmental, and legal reasons for the State and the Commission to expeditiously approve this CPCN application, with no countervailing harm. Accordingly, we respectfully request that the Commission expeditiously approve the Project.

II. CPCN STANDARD

When the Commission considers whether to grant a CPCN, it must take into account “the effect of the generating station ... on:

- (i) the stability and reliability of the electric system;
- (ii) economics;

- (iii) esthetics;
- (iv) historic sites;
- (v) aviation safety as determined by the Maryland Aviation Administration and the administrator of the Federal Aviation Administration;
- (vi) when applicable, air and water pollution; and
- (vii) the availability of means for the required timely disposal of wastes produced by any generating station.”

PUA § 7-207(e)(2). Additionally, the Commission must also consider “for a generating station:

- (i) the consistency of the application with the comprehensive plan and zoning of each county or municipal corporation where any portion of the generating station is proposed to be located; and
- (ii) the efforts to resolve any issues presented by a county or municipal corporation where any portion of the generating station is proposed to be located.”

PUA § 7-207(e)(3). The attached ERD provides significant detail as to all applicable factors, but in summary each such factor weighs heavily in favor of granting the Applicant’s requested CPCN.

The Project is consistent with Harford County’s zoning and comprehensive plan. The Site is zoned AG (Agricultural) where “public utility facilities” are a principal permitted use. *See* Harford County Zoning Code § 267-19 and Permitted Use Chart. The Project constitutes a “public utility facility” and is thus permitted in its proposed location and consistent with County zoning. *See* ERD at §4.A.2. The Project is consistent with Harford County’s 2016 Comprehensive Plan because it supports the County’s policy goals related to renewable energy and sustainable development. *See* ERD at §4.A.3.

The esthetic impact to the Property and surrounding area will be minimal. The Applicant is proposing a 50-foot wide Type E buffer yard pursuant of Harford County Code § 267-30 surrounding the project fencing, except where there will be 50 feet or more of natural forest cover under a conservation easement, which is the most substantial buffer yard referenced in Harford County’s development regulations. *See* ERD at §5.B. In addition, the Applicant is proposing pollinator habitat to exceed the Pollinator Friendly Solar Standard in Maryland. *Id.* The Project is coordinating with the Maryland Historical Trust (“MHT”) to address any impacts to the historic

built environment and/or archeological resources as determined appropriate by MHT. *See* ERD at § 6.A.2.b.

With respect to the stability and reliability of the electric distribution system, the Applicant initiated a process to interconnect with the BGE electric grid serving Maryland by filing an Interconnection Request with PJM and PE. *See* ERD at § 4.B.1. The Project will interconnect to the electric distribution grid serving Maryland through the BGE system through direct line taps on 33 kV circuits along Calvary Road. *Id.*

Pursuant to Federal Energy Regulatory Commission (“FERC”) rules, PJM and BGE undertake a multi-year, three-part interconnection study process to determine any upgrades that may be necessary to allow a proposed generator to interconnect without causing negative impacts to the stability or reliability of the electric power system. The Project has been assigned Queue Positions AF1-299 and AF1-300, each for 15MW AC capacity, and has executed Wholesale Market Participation Agreements for both queue positions. On June 11, 2020, BGE granted conditional approval to the Project and has designated the Applicant with capacity to inject electricity into its distribution network. As a result of the studies and agreements, it is expected that the Project will not negatively impact the system’s stability or reliability after installation of the required equipment. PJM’s FERC-jurisdictional interconnection review process and operational safety measures will ensure the Project will not have a negative impact on the stability or reliability of BGE’s system.

Due to the nature of solar power, the Project will have no impact on aviation. Unlike traditional fossil generation, there is no stack that may pose a hazard to air aviation. *See* ERD 5.B.4 There is no air or water pollution (there are no emissions or discharges) associated with the Project. *See* ERD at §6.B-C. There is also no wastewater or cooling water for which disposal is required.

Waste associated with decommissioning of the Project will be handled appropriately pursuant to a Decommissioning Plan the Applicant will submit to the Commission and Power Plant Research Program for approval prior to the start of construction. *See* ERD at § 6.E.4.

Finally, the Project will include significant economic benefits to the State by making more solar power and solar renewable energy credits available and by creating up to 100 temporary design, management, and construction jobs. *See* ERD at § 2.

III. CPCN APPLICATION FILING REQUIREMENTS (COMAR 20.79.01.04)

- A. The Applicant is PTR HoldCo, LLC.
- B. The Applicant's address is: PTR HoldCo, LLC, 215 Executive Drive, Moorestown, New Jersey, 08057.
- C. The following persons are authorized to receive notices and communications with respect to this Application:

Mr. Barry Skoultchi
Mr. Paul McLean
PTR HoldCo, LLC
215 Executive Drive
Moorestown, New Jersey 08057
bskoultchi@protechennergysolutions.com
pmclean@protechennergysolutions.com

Todd R. Chason
David W. Beugelmans
Gordon Feinblatt LLC
233 East Redwood Street
Baltimore, Maryland 21202
Phone (410) 576-4104
tchason@gfrlaw.com
dbeugelmans@gfrlaw.com

- D. Copies of this application are being made available for public inspection and copying at:

Harford County Planning & Zoning
220 S Main Street, 2nd Floor
Bel Air, Maryland 21014

- E. A list of each local, state, and federal government agency having authority to approve or disapprove the construction or operation of the Project is set forth in Table 1 in the ERD.

F. The Project will interconnect to the electric grid serving Maryland through the BGE system via two interconnection lines taps on 33 kV circuits along Calvary Road.

G. A general description of the generating station under COMAR 20.79.03.01 is provided in Section 5 of the ERD.

H. Implementation schedule: The Applicant expects to receive all necessary local and state approvals and engineering documents by Q1/Q2 2021. Construction is anticipated to be initiated shortly thereafter, with operational startup anticipated by Q2 2022.²

I. The Applicant has provided the environmental information for the generating station in Section 6 of the ERD.

IV. CONCLUSION

The Applicant respectfully requests that the Commission expeditiously approve this Application for a Certificate of Public Convenience and Necessity for the construction of the Project in Harford County, Maryland.

Respectfully submitted,

/s/

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Baltimore, Maryland 21202
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Counsel for PTR HoldCo, LLC

² Dates are subject to change depending on delays, including those associated with permitting, equipment availability and construction.

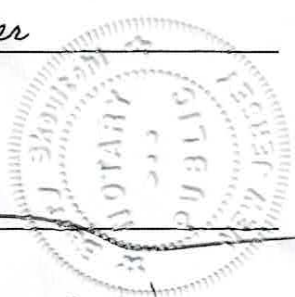

VERIFICATION

Before me, the subscriber, a Notary Public, in and for SOMERSET, NEW JERSEY
this day personally appeared Richard Cooper and made oath and due form of law that he/she is a
Authorized Member at PTR HoldCo, LLC and the matters and facts set forth in the foregoing
Application for a Certificate of Public Convenience and Necessity for the Fairview Farm Solar
Project are true and correct to the best of his/her information, knowledge, and belief.

WITNESS my hand and Notarial Seal this 7th day of August, 2020.

Richard Cooper

Richard Cooper
Authorized Member
PTR HoldCo, LLC



BARRY SKOULTCHI

Notary Public Name (Print)

My Commission Expires: April 3, 2022

BARRY SKOULTCHI
Notary Public Of New Jersey
I.D. No. 2286157
My Commission Expires April 3, 2022