BEFORE THE
MARYLAND PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION OF THE POTOMAC EDISON COMPANY FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO REBUILD THE DOUBS-GOOSE CREEK 500 KV TRANSMISSION LINE IN FREDERICK AND MONTGOMERY COUNTIES, MARYLAND	**)**	**Case No. ____**

APPLICATION FOR A CERTIFICATE
OF PUBLIC CONVENIENCE AND NECESSITY

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") 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 rebuild the existing Doubs to Goose Creek transmission line ("Doubs-Goose Creek Rebuild" or "Project") located in Frederick and Montgomery Counties, Maryland. The Doubs-Goose Creek 500 kV Transmission Line is an approximately 18-mile 500 kV extra-high voltage ("EHV") line linking the EHV system in Maryland to the EHV system in Virginia. The Doubs-Goose Creek Rebuild will replace facilities that have been in service for more than 40 years and are approaching their expected end-of-life. As a result of the Doubs-Goose Creek Rebuild, the line's maximum operating capacity will increase from 2,442 MVA to 4,330 MVA. The line will not only be more reliable by replacing the facilities that are increasingly prone to failure, but it also will be capable of carrying more power.

I. INTRODUCTION

Potomac Edison owns 15.2 miles of the 18.3 mile Doubs-Goose Creek line in the State of Maryland. Dominion Energy Virginia ("Dominion") owns the remaining 3.1 miles of the Doubs-Goose Creek Line in Loudon County, Virginia. *See* Exhibit KMG-3 - Project Location Map, attached to the Direct Testimony of Kelly M. Grube, Exhibit 4 to this Application. Dominion has already commenced preparations to rebuild its portion of the Doubs-Goose Creek line during the same period of time. Potomac Edison is now seeking approval to make a corresponding upgrade to the 15.2-mile segment of the line located in Maryland to address several concerns, including potential overloads, the age of the existing facilities, and future growth in electrical demand.

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. In doing so, Potomac Edison needs to be able to maintain the overall, long-term reliability of its transmission system as its customers require more power in the future. The transmission system is part of the Eastern Interconnection transmission grid, meaning it is interconnected, directly or indirectly, with all of the other transmission systems in the U.S. and Canada between the Rocky Mountains and the Atlantic coast, except Quebec and most of Texas. Potomac Edison is also part of the PJM Interconnection, LLC ("PJM") regional transmission organization which is responsible for ensuring the reliability and coordinating the movement of electricity through all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia, and the District of Columbia. Potomac Edison currently serves approximately 423,600 retail customers in Maryland and West Virginia,

and the Doubs-Goose Creek line serves as a critical EHV line linking the EHV system in Maryland to the EHV system in Virginia in the PJM system.

In furthering its obligation to ensure the reliability of the Doubs-Goose Creek line, Potomac Edison evaluated the condition of the Maryland portion of the line and determined that the structures were deteriorating and fast approaching their end-of-life. The need to replace and rebuild the deteriorating Doubs-Goose Creek line was presented to the PJM Transmission Expansion Advisory Committee ("TEAC") on June 2, 2020. Potomac Edison then presented a rebuild solution to the TEAC on October 6, 2020. The Project was subsequently accepted by PJM to ensure continued reliable service and utility practices in the service territory. As a result of the Doubs-Goose Creek Rebuild, the line's maximum operating capacity will increase from 2,442 MVA to 4,330 MVA. The Doubs-Goose Creek Rebuild not only increases the capacity to carry more power, but also enhances reliability by replacing aging facilities.

The proposed route for the Doubs-Goose Creek Rebuild uses existing transmission corridors primarily owned in fee-simple by Potomac Edison and, therefore, will not deviate from the existing route. Based on preliminary engineering, the proposed modifications will not result in the need for acquisition of additional corridor or the construction of new mid-span structures. Because this project is a modification of existing transmission facilities, an analysis of alternative routes is not required. *See* COMAR 20.79.04.03(B). However, Potomac Edison did consider alternatives to the Project, including re-routing portions of the existing line or constructing a new 500 kV line or multiple lower voltage lines to replace this critical line. As described more fully in the accompanying testimony, Potomac Edison determined that the rebuild proposed in this Application is the best and most economical solution to address the above-noted concerns.

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 January 2023 which, as described in the accompanying testimony, would permit for construction, including the acquisition of equipment exclusively for use in the construction, to begin in Spring 2023; 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 rebuild the Maryland portion of the Doubs-Goose Creek line as proposed. This Application is supported by the Direct Testimony of five witnesses, attached as Exhibits 1 through 5 to this Application:

- Exhibit 1 – Direct Testimony of Lawrence A. Hozempa, Transmission Planning
- Exhibit 2 – Direct Testimony of Kevin C. Irvine, Transmission Design and Construction
- Exhibit 3 – Direct Testimony of Andrew W. Grant, Transmission Line Maintenance
- Exhibit 4 – Direct Testimony of Kelly M. Grube, Environmental
- Exhibit 5 – Direct Testimony of John J. Rostock, Jr., Revenue Requirement

II. INFORMATION REQUIRED UNDER COMAR 20.79.01.05

A. Name of the Applicant

The name of the Applicant is The Potomac Edison Company.

B. Address of Applicant's Principal Business Office

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

C. The Persons Authorized to Receive Notice

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

Jeffrey P. Trout, Senior Corporate Counsel II
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and

Robin D. Leone
Saul Ewing Arnstein & Lehr LLP
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D. Locations at Which a Copy of This Application May Be Inspected by the Public

The public may inspect a copy of this Application at the following locations:

Edward F. Fry Memorial Library
1635 Ballenger Creek Pike
Point of Rocks, Maryland 21777

Quince Orchard Library
15831 Quince Orchard Road
Gaithersburg, Maryland 20878

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

To complete the Doubs-Goose Creek Rebuild, in addition to obtaining a CPCN from the Maryland Public Service 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, Maryland Department of the Environment, Maryland Historical Trust, Maryland Department of Natural Resources, Maryland Agricultural Land Preservation Foundation, Maryland Office of Planning, Maryland Geological Survey, Montgomery County Planning Department, and Frederick County Planning and Permitting

Division. For a complete list of approvals sought and consultations undertaken, please refer to the testimony of Ms. Grube, Exhibit 4 to this Application.

F. The Information Described Under COMAR 20.79.04.01 for Transmission Lines

See Part III below.

G. A General Description of the Transmission Line

The line begins at Doubs Substation located near Buckeystown, Maryland. From there, the line traverses in a southeasterly direction for 15.2 miles in Frederick and Montgomery Counties to the Maryland/Virginia border. At the first structure in Virginia, which is located approximately 200 feet from the border, the ownership of the line passes to Dominion. The line continues for an additional 3.1 miles to Goose Creek Substation located near Leesburg, Virginia. Goose Creek Substation is owned and operated by Dominion. The proposed rebuild will utilize 100 percent of the existing electric utility corridor, primarily owned in fee by Potomac Edison, with no additional corridor required. The Doubs-Goose Creek Rebuild will be an alternating current, single circuit, 500 kV transmission line. The line will consist of three electrical phases elevated above the ground by self-supporting lattice steel towers of self-supporting steel pole structures in a horizontal configuration. Each phase will be comprised of three conductors spaced 18 inches apart and arranged in a triangular bundle. Additionally, to provide lightning protection for the transmission circuits by intercepting direct lightning strikes that would otherwise terminate on the conductors, two shield wires will be installed above the conductors.

Potomac Edison plans to utilize self-supporting lattice steel towers and self-supporting steel poles as the support structures for the transmission line conductors. *See* Exhibit KCI-2, attached to the Direct Testimony of Kevin C. Irvine, Exhibit 2 to this Application. Based on preliminary engineering, Potomac Edison anticipates using structure heights ranging from less than 95 feet to approximately 199 feet in height above ground level. The structures will be made

up of either suspension structures or dead-end structures. The average height of the proposed structures required for the Project are calculated to be less than 135 feet based on the current preliminary line design. This is approximately 20 feet taller on average than the existing towers that will be replaced. The tower structures will be anchored in place with concrete foundations. Overall site and soil conditions will dictate the appropriate foundation required at each footing location but, based on the engineering completed to date, only caisson foundations are planned at this time.

H. <u>An Implementation Schedule for the Project</u>

Because the Project involves the rebuilding of an existing line, the line will need to be taken out of service during construction. Outages on the line are best scheduled for the spring and fall when there are lower energy flows on the transmission grid. The proposed Project schedule, therefore, is divided into three construction seasons: Spring 2024, Fall 2024, and Spring 2025. If the Project is approved prior to the first line outage in Spring 2024, some construction activities, such as acquisition of equipment exclusively for use in the construction,[1] access road construction, any necessary tree clearing, and foundation work, may occur prior to a line outage if such activities are determined safe. Additionally, for some materials, a long lead time is necessary to ensure availability when actual construction begins.

I. <u>The Environmental Information Required Under COMAR 20.79.04.04 for Transmission Lines</u>

See Part VI below.

[1] *See* PUA § 7-207(a)(3)(i)(2) (defining construction to include "entry into a binding agreement or contractual obligation to purchase equipment exclusively for use in construction in the State or to undertake a program of actual construction in the State which cannot be canceled or modified without substantial loss to the owner or operator …").

III. INFORMATION REQUIRED UNDER COMAR 20.79.04.01

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

The regional 500 kV EHV network is the major electrical transmission system that provides electrical energy to Potomac Edison's customers, to other Maryland consumers, and to a large portion of the eastern United States. The primary purpose of the 500 kV EHV network is to deliver bulk power from generation sources to major load centers. At or near the major load centers, the 500 kV EHV network is connected through transformers to the lower voltage transmission systems to deliver electrical energy to the distribution loads. Potomac Edison's portion of Maryland is primarily served by the Hatfield-Black Oak-Bedington-Doubs corridor. This corridor is the main transmission line from remote generation sources to Potomac Edison's load centers. The local transmission serving Maryland load is connected to the 500 kV system through transformers at Black Oak, Bedington, and Doubs substations. The transformers at these stations today supply over 2,500 MW of power into the underlying transmission system from the 500 kV system.

Accordingly, the Doubs-Goose Creek line is a critical component of the electric transmission network that serves Maryland and beyond. Most of the structures on the Doubs-Goose Creek line have been in-service for more than 40 years, and the facilities, which are approaching their expected end-of-life, require replacement to maintain reliable electric transmission service in the region. As the electrical load continues to grow, opportunities to take the Doubs-Goose Creek line out of service for rebuilding will be reduced. Further, the equipment and facilities comprising the Doubs-Goose Creek line will continue to age, which will increase the probability of a failure that will impact the reliability of the transmission network serving Potomac Edison's customers. As described in the Direct Testimony of Andrew W.

Grant, Exhibit 3 to this Application, the existing conditions of the Doubs-Goose Creek line indicate the need for a full rebuild in the very near future.

As described in Mr. Grant's testimony, Potomac Edison evaluated the condition of the Maryland portion of the Doubs-Goose Creek line and determined that the structures were deteriorating and approaching their end-of-life. PJM considered the Doubs-Goose Creek Rebuild as a Supplemental Project during its June 2020 TEAC meeting. As a transmission owner in the PJM region, Potomac Edison participates fully in PJM's transmission planning process and is obligated under the PJM Operating Agreement to construct, operate, and own transmission facilities as designated by PJM. Potomac Edison then presented a rebuild solution to the TEAC on October 6, 2020. The PJM has since approved the Project to ensure continued reliable service and utility practices in the service territory.

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

Because Maryland is a net importer of electric energy, it is particularly dependent on a reliable and robust transmission system. The Doubs-Goose Creek Rebuild will help assure the future reliability of Potomac Edison's transmission system and provide additional transmission capacity into Maryland. Potomac Edison's portion of Maryland is primarily served from 500 kV corridors from the west, south, and east. These corridors are the main transmission lines from remote generation sources to Potomac Edison's load centers. The Doubs-Goose Creek line provides the link from the south to Maryland's transmission system when any of the other corridors are constrained or out of service.

As an EHV line in the electric transmission network linking the EHV system in Maryland to the EHV system in Virginia, the Doubs-Goose Creek line provides greater operational flexibility to the Regional Transmission Organization and the Transmission Owners when

operating the system for adverse system conditions and for planned and unplanned outages. The proposed Project will increase the line's maximum operating capability from 2,442 MVA to 4,330 MVA (Summer Normal rating). Additionally, the Doubs-Goose Creek line is very near the end of its service life. According to industry averages, the structures present on this line are nearing, or are already past, expected end-of-life. The line must be rebuilt in order to maintain the reliability of the transmission system and to comply with mandatory NERC Reliability Standards.

A.(3) A Description of the Consequences if the Project Is Not Approved

Should the project not proceed as planned, the reliability of the transmission system, especially the reliability of the EHV network and the transmission system for Maryland, will be at risk. The 15.2-mile line plays a critical role in supplying electric energy to Maryland and delaying the rebuilding of this line increases the risk of infrastructure failures that would compromise the availability and reliability of transmission service for Maryland customers.

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

The current authorized budget for this project is estimated at $65.8 million for rebuilding the existing transmission line and associated substation work. As described in the Direct Testimony of Lawrence A. Hozempa, Exhibit 1 to this Application, the proposed modification is the most cost-effective alternative for addressing the identified needs.

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

Potomac Edison's additional investment will increase the tax base in Frederick and Montgomery Counties; specifically, Potomac Edison anticipates an estimated property tax expense in the amount of roughly $0.5 million. Because the estimate is based on a number of factors, including assessed values of real and personal property, operating income and other

criteria, the actual property tax levied on Potomac Edison may differ from this estimate. During construction, opportunities will exist for local companies to supply labor and some materials, such as concrete. Due to the modest size of the work force, Potomac Edison does not anticipate significant taxes or spending associated with the work force, which is estimated to peak at 65-100 workers during certain phases of the construction schedule.

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 Doubs-Goose Creek Rebuild, including corridor dimensions and specific components of the line and circuits, is contained in the testimony of Mr. Irvine, attached to this application as Exhibit 2. Briefly, the Doubs-Goose Creek Rebuild will replace all existing towers with new structures. Potomac Edison plans to utilize self-supporting lattice steel towers and self-supporting steel poles as the support structures for the transmission line conductors. The structures will be made up of either suspension structures or dead-end structures depending on the strength requirements at each specific structure location. On average, the height of the new structures will be 20 feet taller than the existing structures. Based on the engineering completed to date, the tower structures will be anchored in place with concrete caisson foundations. Porcelain or toughened glass insulators will be used for all structures. Conductor attachment hardware will be standard galvanized steel or aluminum alloy and will be capable of supporting conductors through the full range of operating temperatures.

The rebuilt line will be an alternating current, single circuit, 500 kV transmission line, consisting of three electrical phases elevated above the ground by self-supporting lattice steel towers or self-supporting steel pole structures. Each phase will consist of three conductors (called "subconductors") spaced 18 inches apart and arranged in a triangular bundle, with the apex pointing

down. The main change between the existing line design and the proposed line design is the conductor bundle, with the proposed design utilizing three subconductors per phase. Two shield wires will be installed above the conductors. Both shield wires will be optical ground wire. This wire is composed of aluminum and aluminum-clad steel strands surrounding an aluminum tube containing fiber-optic strands. The optical ground wire will be used for Remote Terminal Unit Supervisory control and data acquisition communication in addition to potential PJM-mandated relay protection circuits. The shield (or ground) wires will also provide lightning protection.

The conductor tensions utilized in this Project will be near 40 percent, well below the maximum National Electrical Safety Code("NESC")-permitted conductor loading. The line will be allowed to operate with a conductor temperature up to 392 degrees Fahrenheit. At that temperature, the line will be at its lowest operating tension. Individual structure heights will be designed along the centerline such that the line will meet or exceed NESC design clearances when at its minimum tension or maximum sag conditions along its entire length. The individual structures are designed to carry the maximum conductor loads anticipated at each structure location for the conductors and line configuration. The structures also are designed to provide sufficient clearances between the three conductor phases to allow for the performance of service and maintenance with the conductors energized ("live" line work). The conductor-to-ground clearances for the Project will meet or exceed the clearance requirements outlined in Section 23 of the NESC.

B. Property Acquired or To Be Acquired

Potomac Edison does not anticipate the need to acquire any additional property or corridor to accommodate the line rebuild because the project will use existing corridors owned by Potomac Edison and existing easements.

C. Access Roads for Construction or Maintenance

In most cases, existing access roads and open fields will be utilized to the extent possible. Where existing roads are not available, emphasis will be placed on following the existing transmission corridor. Any new access roads will be temporary, with the disturbed area rehabilitated upon completion of construction activities. Whenever possible, streams, wetlands, or other environmentally sensitive areas will be avoided; however, if these sensitive areas are unavoidable, care will be taken to minimize impact by using culverts, temporary bridges, and matting. Further information regarding construction access associated with the Doubs-Goose Creek Rebuild is contained in the testimony of Ms. Grube.

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

Because the Project is a rebuild, the rolling and incised terrain creates moderate visibility, and the proposed structures are of the same type as the existing structures with only minor changes in height, the viewshed impacts of the proposed structures are anticipated to be minor. Features within the viewshed of the Project are listed in Exhibit KMG-4, Table 1, accompanying the testimony of Ms. Grube. While the Project is anticipated to have an insignificant viewshed impact on historic resources, the line is visible from nearby parks where it crosses through the Chesapeake & Ohio ("C&O") Canal National Historical Park and runs adjacent to the Calico Rocks Regional Park and the Meredith Hunting Quarters. The line also crosses in between two wildlife management areas identified as the Dickerson Conservation Area and the Monocacy State Natural Resource Management Area ("NRMA"). In general, there will be minor changes to the physical attributes associated with the corridor and, therefore, little impact to the present viewscape.

E. Construction within the 100-Year Floodplain

The route aerially crosses 100-year floodplains associated with the Potomac River and Monocacy River. Applicable permits and approvals will be secured prior to construction. Additionally, direct impacts to streams are expected to be avoided during construction by using culverts, temporary bridges, and matting.

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

The project is not located within one mile of any public airport.

G. Depiction on Topographical Map

The required map is filed with this Application as Exhibit KMG-3, attached to the testimony of Ms. Grube.

V. INFORMATION REQUIRED UNDER COMAR 20.79.04.03

A. Description of Each Alternative Route Considered

Because this project is a modification to an existing transmission line, under COMAR 20.79.04.03.B, alternative routes need not be evaluated. No alternative routes were extensively evaluated because the proposed Project will occur within an existing transmission line route and will not require acquisition of additional corridor and because the line's location would prevent a shift of the route west due to its proximity to the Potomac River and the historic C&O Canal or north due to its proximity to the Monocacy State NRMA. However, as discussed in the testimony of both Mr. Hozempa and Ms. Grube, alternatives to the line were, in fact, considered and found to be less cost-effective and of greater, adverse environmental impact.

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

The central and western regions of Maryland are home to an assortment of wildlife habitat, ranging from mountainous hardwood forests in the west to flat, open agricultural and intermittent wood areas in the Piedmont to the east. There are forest resources near the Project area, including within the C&O Canal National Historical Park, Dickerson Conservation Area, Banner Park, Monocacy State NRMA, Sugarloaf Mountain, Meredith Hunting Quarters, and Owens Park. Forest 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 the Maryland Department of Natural Resources ("DNR") Wildlife and Heritage Service related to plant species of concern in the Project area. Two were identified as previously documented in the Project area: veined skullcap (*Scutellaria nervosa*), a herbaceous plant in the mint family; and rough flatsedge (*Cyperus retrofractus*) a member of the sedge family.

A variety of wildlife species are found throughout these habitats, including several species of common game mammals and birds. Common mammal species within the vicinity of the Doubs-Goose Creek Rebuild include white tailed deer, black bear, raccoon, striped skunk, eastern gray squirrel, and several other small furbearers. Common bird species found throughout the Doubs-Goose Creek Rebuild area include the northern cardinal, blue jay, wild turkey, red-tailed hawk, broad-winged hawk, and species of sparrows, swallows, and warblers. Several deciduous forest species such as wood thrush, acadian flycatcher, scarlet tanager, Louisiana waterthrush, and eastern wood-pewee can also be found in the project area.

Common amphibian species within the Doubs-Goose Creek Rebuild 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 garter snake, northern black racer, five lined skink, and northern copperhead. The most common species of fish found in Maryland streams such as those located within the limits of the project area include the blacknose dace, eastern mud minnow, creek chub, blue ridge sculpin, mottled sculpin, and tessellated darter. The DNR also frequently stocks streams and ponds with largemouth bass, trout and carp.

Potomac Edison consulted with DNR and U.S. Fish and Wildlife Service ("USFWS") related to species of concern in the Project area. Habitat for three amphipod species occurs in the Project vicinity, but based on the information provided by DNR, these amphipod species are located outside of the Project corridor. DNR also identified one type of isopod located in the Project vicinity and stated that the Appalachian springsnail may occur in the Project vicinity. Because appropriate erosion and sediment controls will be installed for areas of construction to minimize groundwater pollution, and based on conversations with DNR, impacts are not anticipated for these species. Additionally, a pair of nesting bald eagles was identified during the March 2020 environmental survey within the vicinity of the transmission corridor. Potomac Edison will utilize guidance provided by the USFWS and contained in its Northeast Bald Eagle Screening Form to avoid or minimize impacts to the bald eagles.

Key hydrologic features within the Project area include the Potomac River and its tributaries. Stream and wetland delineations conducted in March 2020 within the Project corridor identified 51 streams and 20 wetlands. The total area of all wetland classifications crossed by the study corridor is approximately 3.1 acres. This quantity represents the total

acreage of wetlands delineated, as opposed to anticipated wetland impacts. No DNR Wetlands of Special State Concern were identified within the Project corridor.

A review of cultural resource files maintained by the Maryland Historical Trust ("MHT") identified 37 recorded cultural resources within 0.25-mile of the Project centerline, consisting of five surveyed historic architectural resources and 32 archaeological sites. The five surveyed historic architectural resources consist of one national park, one historic district, one railroad, one natural resources management area, and one surveyed historic structure, including resources that are either National Register of Historic Places listed or eligible. The required level of survey, extent of viewshed area of potential effect, evaluation, and determination of the NRHP eligibility of documented resources is ongoing in consultation with the MHT. Further information regarding the physical, biological, aesthetic and cultural features and conditions of the site and adjacent areas is provided in the testimony of Ms. Grube.

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

The impact of this project on the natural, cultural, and historical features of the surrounding environment will be minimal because the Project will use the existing corridor and assumes the placement of structures in the same, or approximately the same, locations as existing structures. There will be no increase in the corridor width. Existing access roads and open fields will be used to the extent possible for access to the corridor for construction. Lattice structure construction requires substantial access areas at the structure locations because of the equipment necessary for installation. Concrete trucks, cranes, bucket trucks, and ancillary vehicles must be able to access and move around the installation area. Maintenance along the corridor will result in the clearing of some minimal trees and brush, which would be necessary whether or not the

line is rebuilt. Additional vegetation removal necessary for construction and clearance will be limited to the existing corridor, identified danger trees, and proposed temporary access roads.

In refining the Project design, Potomac Edison will seek opportunities to further minimize and mitigate impacts to sensitive areas, including wetlands. It is anticipated that most wetlands and streams in the Project area, including in the corridor, will be outright avoided during construction. If wetlands or streams cannot be avoided during construction, appropriate Best Management Practices will be undertaken, and necessary authorizations will be acquired from MDE and the U.S. Army Corps of Engineers. Streams within the existing corridor will remain unchanged. 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. Furthermore, initial consultation with the DNR Environmental Review Program indicated that the Project crosses many tributaries to the Potomac River which are designated as Use I-P (public water supply) streams. At the DNR request, no in-stream work be conducted within these streams during March 1st through June 15th to protect spawning fish.

With respect to socioeconomic effects, Potomac Edison anticipates that the tax bases in Frederick and Montgomery Counties will increase slightly from its additional investment. The real estate property tax for the calendar year following the in-service date of the Project is estimated to be roughly $0.5 million. The actual property tax levied on Potomac Edison may be different from the estimate because it is based on a number of factors, including assessed values of real and personal property, operating income, and other factors. Because the construction workforce is not expected to exceed 65-100 workers 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 testimony of Ms. Grube, and further information regarding socioeconomic effects is provided in the testimony of Mr. Irvine and in the Direct Testimony of John J. Rostock, Jr., Exhibit 5 to this Application.

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

Reports of field surveys, including wetland delineation, will be provided once the survey work is completed.

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

Potomac Edison confirms that it has the ability and will conform to the applicable environmental requirements.

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

Section 7-209 of the PUA requires that the Commission examine alternatives to the construction of a new transmission line in a service area. Although this is a modification of an existing line and not construction of a new line, as described more fully above and in the testimony of both Mr. Hozempa and Ms. Grube, Potomac Edison has considered several alternatives to the Doubs-Goose Creek Rebuild and has concluded that none of the alternatives will adequately address the identified issues as effectively and cost-efficiently as the proposed Doubs-Goose Creek Rebuild.

VIII. SUPPORTING DOCUMENTATION

A. Testimony in Support of the Mt. Storm-Doubs Rebuild

Attached to and made a part of this Application as Exhibits 1 through 5 are the Direct Testimony and exhibits of the following witnesses:

- **Lawrence A. Hozempa, General Manager, Planning in the Transmission Planning and Protection Department**, will discuss the purpose of and electrical

necessity for the proposed project, including the specific facilities Potomac Edison proposes to modify; 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; and the cost effectiveness of the project and the reason for its selection over other alternatives considered.

- **Kevin C. Irvine, Engineer, Transmission Line Design Group**, will describe the engineering details, design, and construction methodology of the proposed project.

- **Andrew W. Grant, Engineer, Transmission Maintenance, Transmission and Substation Services Department**, will discuss transmission line maintenance and describe the current condition of the line and need for the project from a reliability and maintenance perspective.

- **Kelly M. Grube, Senior Scientist, Environmental Department**, will describe the existing transmission line route and discuss the environmental, land use, and visual impacts of the project on the surrounding environment.

- **John J. Rostock, Director of Rate Support, Rates and Regulatory Affairs**, will discuss cost allocation and cost impact on residential customers, as well as the tax benefits to the local region resulting from this project.

This testimony, together with the Application, fully satisfies the requirements of Md. Code Ann., Pub. Util. Art. § 7-207 and COMAR 20.79.04.

IX. CONCLUSION

Completion of the Doubs-Goose Creek Rebuild to accommodate an in-service date of June 2025 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 for the Doubs-Goose Creek Rebuild to Potomac Edison as requested in this Application, and grant such additional authorizations, waivers, approvals, and other relief as may be necessary to permit the rebuilding of the Maryland portion of the Doubs-Goose Creek 500 kV transmission line.

[SIGNATURES TO FOLLOW]

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VERIFICATION BY APPLICANT

I hereby swear that I am duly authorized to execute this Application on behalf of The Potomac Edison Company and that the contents of the Application are true and correct to the best of my knowledge, information, and belief.

_____(Signature)
James A. Sears, Jr.
Vice President

The Potomac Edison Company

Taken, sworn to and subscribed before me this _____ day of July, 2021.

_____
Notary Public

My Commission expires on the _____day of _____, ____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of August, 2021, pursuant to COMAR 20.79.02.02, the foregoing Application of The Potomac Edison Company for a Certificate of Public Convenience and Necessity was served on the following:

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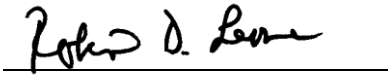
In accordance with COMAR 20.79.02.02B(6), notice of the foregoing Application is being sent to each owner of land, and each owner of adjacent land, on which the proposed transmission line will be located.



Robin D. Leone