

Maryland Public Service Commission Attn: Frederick H. Hoover, Chairman 6 St. Paul Street, 16th Floor Baltimore, MD 21202

November 11, 2024

Re: Opposition to the Maryland Piedmont Reliability Project

Dear Chairman Hoover:

The Carroll County Chamber of Commerce, on behalf of our more than 600 members, is writing to formally express our opposition to the Maryland Piedmont Reliability Project. As an organization that represents businesses in Carroll County – including working farms and agritourism, we have significant reservations regarding the environmental, social, and economic impacts this project may have on our region, and we urge you to halt its approval.

Our concerns align with those of many who have already expressed their opposition to you and other Maryland officials. These include:

Environmental Concerns:

The route did not perform particularly well with regard to environmental criteria. Those criteria measure the wetlands, forests, floodplains, and critical habitat of protected species on the project's path, according to PSEG documents.

The proposed project could have detrimental effects on local ecosystems and wildlife habitats. The construction and operation of new transmission lines, substations, and other infrastructure could lead to deforestation, habitat fragmentation, and negative consequences for endangered species in the region. Furthermore, the long-term environmental costs of this project, including potential pollution and the disruption of natural landscapes, have not been adequately addressed in the project's environmental impact assessments. The commitment to sustainable energy solutions requires careful consideration of the ecological consequences, and this project does not appear to meet that standard.

Community Impact:

The project would significantly alter the landscape and character of the Maryland Piedmont region, which is known for its natural beauty, historic sites, and rural character. The construction of large, industrial-scale infrastructure will diminish property values, disrupt local communities, and lead to a loss of the aesthetic and cultural value that the region holds.

Many family farms will be negatively affected. As an example, Baugher's Orchards and Farms. The path would run for about 3/4ths of a mile through their farmland, according to farm manager and president Dwight Baugher, of Westminster. He has stated this could cost his operation millions of dollars.



As quoted in a recent Carroll County Times article, "We're not just being impacted right in front of my house and generational farm ground that we work hard to keep," Baugher said. "It's going to go through three more farms of ours, and a neighboring farm, and then many other neighbors."

Baugher is the fourth generation of his family to farm land on the project's path, with a fifth generation expected to continue the tradition. He lives in a house overlooking fields that belonged to his grandmother, from which the transmission lines will be visible.

In addition, the project would be especially harmful to the Baugher's pick-your-own business. "We have upwards of 80,000 to 100,000 visitors to our farm through all the seasons, to pick and enjoy the agricultural and country backdrop," he has said. "We're way more visible to the public because of our agritainment and pick-your-own crops, that people visit, and pay to come out on the farm. Power lines buzzing, ticking, making you statically charged, and looking at it in all your fields, does not make that look too appealing."

Baugher's is not the only farm to be affected. It is estimated that upwards of 45 different farms will experience negative effects as a result of this project.

An internal survey by the Maryland Farm Bureau revealed that more than 1,300 acres of farmland is at risk. The potential loss could have serious implications for local food supply and worsen food insecurity problems.

Lack of Adequate Public Engagement:

Many residents of the affected areas feel that they have not been adequately consulted regarding the details of the project. Public hearings and community outreach efforts have not provided sufficient opportunity for meaningful participation and input. It is crucial that decisions of such importance be made with full transparency, and with the genuine involvement of the communities directly impacted.

Lack of Consideration for Alternative Solutions:

Other viable, and potentially less expensive, alternatives were not seriously considered.

State Sen. Chris West has proposed an alternative to the proposed 70-mile transmission line threatening to raise energy bills and compromise farmland in Carroll. He, and others, have proposed replacing conductor cables on existing power lines in a process called reconductoring. This would involve using existing power lines with advanced materials that can double their capacity quickly and efficiently, reducing the need for new transmission lines.

Other alternatives according to StopMPRP.com include:

- **Grid-Enhancing Technologies (GETs)**: Solutions like dynamic line ratings can optimize the capacity of the current system by using weather conditions, such as wind, to cool transmission wires and increase their ability to carry more energy.
- **Battery Storage**: Advanced battery storage solutions can help balance the grid by storing excess energy during off-peak times and releasing it when demand is higher.
- **High-Voltage Direct Current (HVDC) Technology**: HVDC lines are more efficient at transmitting electricity over long distances, minimizing energy losses and reducing environmental impact.



• **Promote Microgrids**: Data centers, a major driver of increased energy demand, should be encouraged to generate their own power through onsite, carbon-neutral microgrids, reducing strain on the main grid.

These alternatives would minimize environmental harm while enhancing the long-term sustainability of Maryland's energy infrastructure. It is unclear which, if any, of these alternatives have been considered by PSEG.

Disconnected Cost/Benefit Ratio:

Ratepayers in Carroll County will be expected to shoulder the costs of this project that will not primarily benefit them. It is estimated that only 3.86% of the power from these transmission lines will be used in Maryland; far less than that in Carroll County. Given that the primary beneficiaries of this project are data centers in Northern Virginia and Southern Frederick County, this seems quite disproportional.

Accelerated Time-line:

PSEG has stated it intends to submit for the PSC before then end of 2024, with construction of the project being completed by the end of 2025.

In fact, as of 11/5/2024, PSEG has already begun photographing the proposed path and conducting initial field studies. This is before submitting to the PSC for approval.

We are very concerned about the speed of this project, especially given the nearly universal opposition to it.

In conclusion, while the Carroll County Chamber of Commerce recognizes the importance of ensuring reliable power distribution throughout the state, it strongly believes that the Maryland Piedmont Reliability Project is not the right solution. The potential environmental damage, health risks, and community disruption associated with the project outweigh any potential benefits. We urge the Maryland Public Service Commission to reject this project and explore other more sustainable and community-friendly options.

Sincerely,

Mike McMullin President

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