



An Exelon Company

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April 15, 2020

**VIA ELECTRONIC FILING**

Andrew S. Johnston, Executive Secretary  
Maryland Public Service Commission  
William Donald Schaefer Tower  
6 St. Paul Street, 16<sup>th</sup> Floor  
Baltimore, MD 21202

**Re: Request for a Mandatory Waiver of the CPCN Requirement for a Project to Rebuild a Portion of an Existing Overhead Transmission Line in Harford County to Improve Reliability Performance**

Dear Mr. Johnston:

Baltimore Gas and Electric Company (“BGE”) respectfully requests that the Maryland Public Service Commission (the “Commission”) waive the requirement to obtain a certificate of public convenience and necessity (“CPCN”) pursuant to Section 7-207(b)(4)(i) of the Public Utilities Article of the Annotated Code of Maryland in connection with the specific work described below on an existing 115 kV overhead transmission line located in Harford County, Maryland.

BGE is responsible for maintaining the safety and reliability of its electric transmission system and ensuring that the regional transmission organization, PJM Interconnection, L.L.C. (“PJM”), can properly and reliably operate the interconnected system within the PJM region. As part of this responsibility, BGE must rebuild a portion of an existing overhead transmission line located in Harford County that runs from existing Structure Nos. 3006 and 3007 in the vicinity of BGE’s Perryman substation, to BGE’s Harford substation in order to address aging infrastructure and resolve avian interference (the “Project”). Specifically, the new structures included in this Project are structure numbers 3246 through and including 3288. With the exception of structures 3287 and 3288, all of the structures are located on the property of the U.S. Army’s Aberdeen Proving Ground facility. See Appendix A for an aerial image of the Project site.

BGE plans to commence site work and pre-construction activities on the Project in October 2020, and BGE estimates that it will take approximately 15 months to complete the Project. The estimated cost to complete the Project is \$23.2 million, and BGE will seek recovery of the cost through its formula transmission rate contained in PJM’s Open Access Transmission Tariff on file with the Federal Energy Regulatory Commission.

**A. Description of the Need for the Project and Scope of Work**

The section of the existing BGE 115kV overhead transmission line that runs between the vicinity of the Perryman substation and Harford substation consists of two circuits (Circuit Nos.

110617 and 110618) installed on parallel single-circuit wood H-Frame structures over a distance of approximately 3.9 miles (the “Existing OH Line”).

The Existing OH Line was built in the 1950s. Every structure has significant corrective maintenance and aging infrastructure concerns that include bird holes, bird nests, degraded wood poles, hardware and insulators. By renewing with steel poles on concrete foundations, many of these issues will be reduced or eliminated.

The specific scope of work associated with the Project generally consists of the following:

1. Modification of Orientation of Existing OH Line

Currently, Circuit Nos. 110617 and 110618 are installed on 2 parallel single-circuit wood pole lines that are centered 52.5 feet apart on a 118.5-foot wide right-of-way (“ROW”). As part of the Project, the two existing wood pole lines will be replaced with one double-circuit weathering steel monopole line that will be slightly offset, to the west, from the centerline of the existing ROW. All work will be done within BGE’s existing ROW.

2. Replacement of Existing Wood H-Frame Structures

BGE will replace 84 wood H-Frames with 43 weathering steel poles along the approximately 3.9 mile stretch between the vicinity of the Perryman substation to Harford substation. Thus, the Project will result in a net reduction of 41 structures. The replacement pole structures will range in height from approximately 72 feet to 97 feet with a base diameter of approximately 60 inches tapering to approximately 25 inches at the top of the pole. See Appendix B attached hereto for figures of representative structures to be installed. The existing wood pole structures along the Existing OH Line range in height from approximately 47.9 feet to 75.2 feet. The typical footprint of the existing wood H-Frame is 50 square-feet (including the area between poles).

3. Replacement of Conductor and Shield Wire

Currently, circuits 110617 and 110618 have 556.5kcm 24/7 ACSR “Parakeet” installed. As part of the Project, 556.5kcm 24/7 ACSS/AW “Parakeet” conductor, which is the same size as the existing conductor, will be installed. In addition, the two existing shield wires are 0.512” 48-fiber optical ground wire (“OPGW”) and 7#8 Alumoweld wire. The replacement shield wires will be renewed with installations of 0.512” 48-fiber OPGW and 7#8 Alumoweld wire. There are no increases in any conductor or shield wire sizes as a result of the Project.

**B. Additional Information on Schedule, Tasks Required to Complete the Project, Government Agency Oversight of the Project, Environmental Impacts and Outreach**

The following is the current schedule for the overhead transmission line construction work associated with the Project:

<b>Task/Milestone</b>	<b>Commencement Date</b>	<b>Completion Date</b>
Planning, Engineering, and Design	12/16/2019	08/05/2020
Transmission Civil/Electrical Construction of Replacement OH Transmission Line	10/01/2020	12/31/2021
Decommissioning and Demolition of Existing OH Transmission Line 110618	03/01/2021	06/30/2021
Decommissioning and Demolition of Existing OH Transmission Line 110617	09/01/2021	12/31/2021
Replacement OH Transmission Line Placed into Service 110618	06/30/2021	06/30/2021
Replacement OH Transmission Line Placed into Service 110617	12/31/2021	12/31/2021

The primary tasks required for completing the construction work associated with the Project are as follows:

- Installation of any sediment and erosion control measures as dictated by permits;
- Installation of matting or establishing/re-establishing access roads as permitted for the BGE transmission corridor;
- Installation of concrete pier foundations;
- Removal of existing conductors, shield wires, insulators and wood poles on the west side of the transmission corridor;
- Assembly and erection of 43 replacement weathering steel poles;
- Installation of new hardware, conductors, and shield wires;
- Removal of existing conductors, shield wires, insulators and wood poles on the east side of the transmission corridor; and
- Right-of-way clean-up and restoration activities.

1. Government Agency Oversight of the Project and Environmental Impacts

BGE’s work in connection with the Project requires coordination, reviews, and approvals from various government agencies. The following table includes some additional details on certain approvals required from government agencies involved with overseeing the work performed by BGE in connection with the Project:

Government Agency	Description of Required Reviews and/or Approvals
<p><b>Maryland Department of the Environment</b></p>	<ul style="list-style-type: none"> <li>• Technical Services and Permitting – General Stormwater Permit for Construction Activities, which is required for earth disturbances associated with construction that are equal to or greater than one acre.</li> <li>• Stormwater Management Approval – For land disturbance activities over 5,000 square feet. A variance is required for the temporary disturbance and pole replacements.</li> <li>• Erosion and Sediment Control Plan Approval – For land disturbance activities over 20,000 square feet or more than 100 cubic-yards.</li> <li>• Joint Permit Application (JPA) Approval for 100-year floodplain, nontidal wetlands, wetland buffer and waterway impacts (temporary and permanent) due to proposed work activities.</li> </ul>
<p><b>Federal Aberdeen Proving Ground</b></p>	<ul style="list-style-type: none"> <li>• A dig permit is required for ground intrusion &gt;6". Permits may require Unexploded Ordinance (UXO) scanning.</li> <li>• A Record of Environmental Consideration (REC) has been received, including a Record of Non-Applicability (RONA), Erosion, Coastal Zone, Forestry, Wetland, Eagle/Avian, &amp; Flora/Fauna requirements.</li> </ul>
<p><b>Federal Aviation Administration (FAA)</b></p>	<ul style="list-style-type: none"> <li>• FAA approval is required for construction that has the potential to affect navigable airspace (height in excess of 200 feet or within 20,000 feet of an airport).</li> </ul>

BGE’s environmental permitting contractor is also in the process of submitting consultation letters with the Maryland Department of Natural Resources Project Review Division, Maryland Department of Natural Resources Wildlife and Heritage Services, Maryland Historic Trust, and US Fish and Wildlife Services.

BGE anticipates only minimal environmental impacts from the construction of the Project.

Furthermore, BGE will comply with all permitting and legal requirements in connection with the construction of the Project and otherwise take steps to minimize impacts to the environment. All conductor materials will be handled in a manner to avoid contacting the ground during stringing. Wooden planks or other non-metallic lagging will also be used to protect conductor from direct contact with the ground during splicing and dead-ending operations. As all work relates to an existing overhead transmission line on an existing ROW that is regularly maintained, BGE does not anticipate the need for tree clearing with the Project; there is only the potential need for minor shrub clearing in the vicinity of existing structures Nos. 3246 – 3288. Construction activities will maintain any applicable wetland and/or stream buffer clearances.

## 2. Outreach

The majority of the Project corridor is located along the Aberdeen Proving Ground (“APG”) military facility in Harford County, Maryland. BGE began coordinating with APG personnel regarding the Project in January of 2019. APG is supportive of the Project, as expressed in the letter from APG’s Director of Public Works attached hereto as Appendix C. BGE is also coordinating with APG News, a weekly print and digital publication that shares updates with the base community. BGE will provide a description of the Project to the paper, which is printed on Tuesdays, allowing for notification to also be placed on the APG social media channels.

There are only a few residences and businesses located outside of the APG property line that are adjacent to the existing overhead transmission line. BGE began contacting property owners adjacent to the Project corridor in the second quarter of 2020 to share Project information. BGE mailed letters to nearby commercial and residential properties. The letters include contact information for BGE personnel should customers have questions or concerns about the Project, the construction schedule, or construction activities.

In addition, BGE has informed Harford County government officials about the Project and will continue to update these officials and other interested stakeholders on the progress of the Project and any associated impacts to adjacent properties. BGE plans to hold a public forum in June 2020 to discuss the Project and receive comments prior to beginning any construction work.

BGE expects zero (0) hours of customer interruption associated with the construction work necessary to complete the Project.

### **C. Legal Analysis of BGE’s Request for a CPCN Waiver**

Section 7-207(b)(4)(i) of the PUA provides in relevant part as follows:

[F]or construction related to an existing overhead transmission line designed to carry a voltage in excess of 69,000 volts, the Commission shall waive the requirement to obtain a certificate of public convenience and necessity if the Commission finds that the construction does not:

1. require the electric company to obtain new real property or additional rights-of-way through eminent domain; or
2. require larger or higher structures to accommodate:
  - A. increased voltage; or
  - B. larger conductors.

(emphasis added).

All of the above-referenced statutory requirements for obtaining a mandatory waiver of the CPCN requirements from the Commission are satisfied:

- All work involved with the Project relates to an existing overhead transmission line designed to carry a voltage in excess of 69,000 volts.
- In order to construct the Project, BGE will not need to obtain any new real property or additional rights-of-way through eminent domain. All work related to the Project will take place within the existing BGE transmission right-of-way.
- While replacement structures will be installed, the existing 115 kV transmission line will remain energized at 115 kV, and the conductor and shield wires will not increase in size.

For all of the above-stated reasons, BGE respectfully requests the Commission grant BGE a mandatory waiver from the requirement to obtain a CPCN for the Project. Pursuant to the Commission's March 16, 2020, Notice of Waiver and Relaxed Filing Requirements, the Company will not provide paper copies of this filing.

Respectfully submitted,

*Jessica M. Raba*

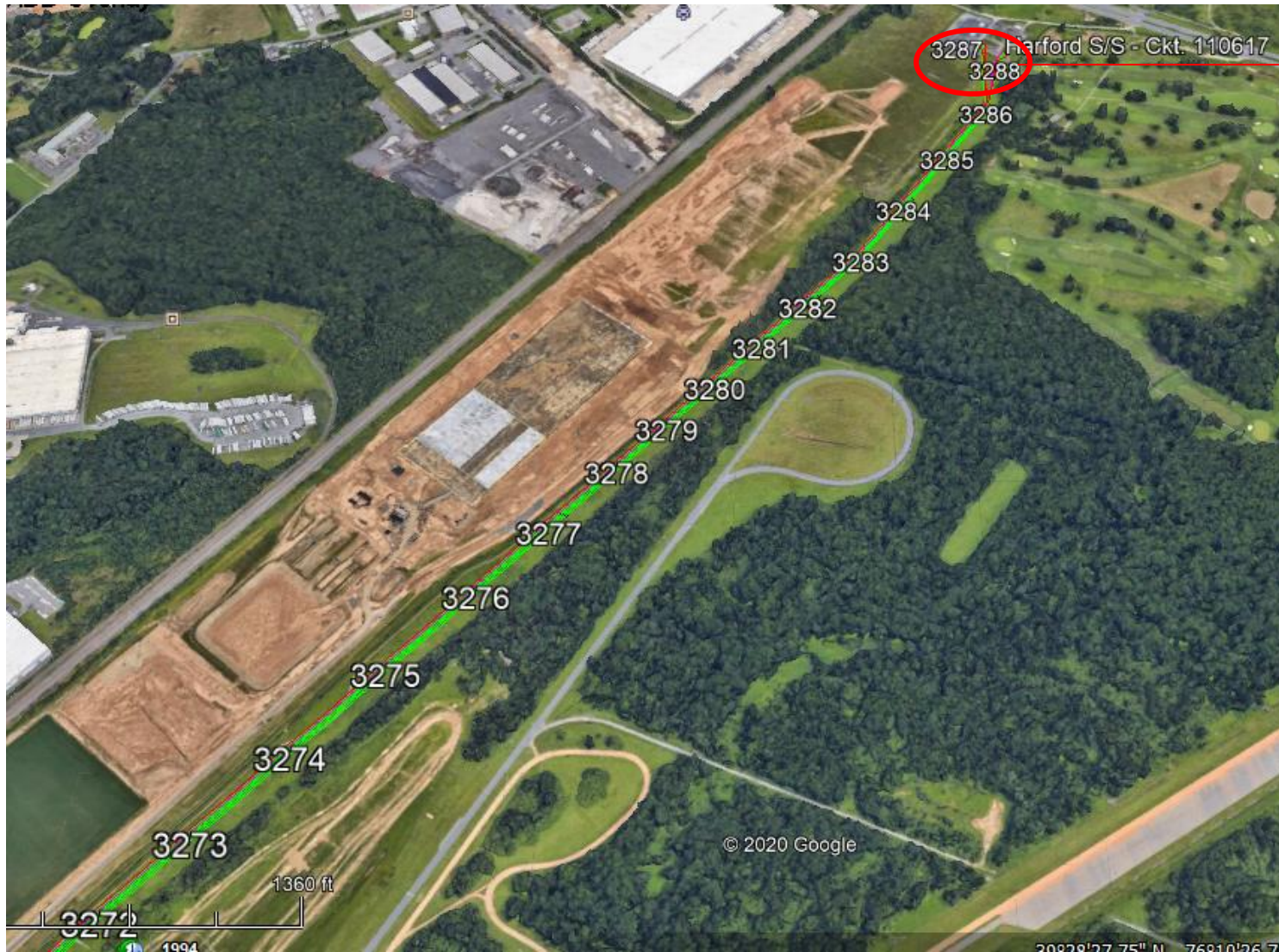
Jessica M. Raba

Enclosures

cc: Leslie M. Romine, Staff Counsel, Maryland Public Service Commission  
Paula M. Carmody, Maryland People's Counsel, Maryland Office of People's Counsel  
Steven M. Talson, Lead Counsel, Maryland Energy Administration



Appendix A - Aerial Image of Project Site



Outside of APG









## Appendix B: Representative Structures

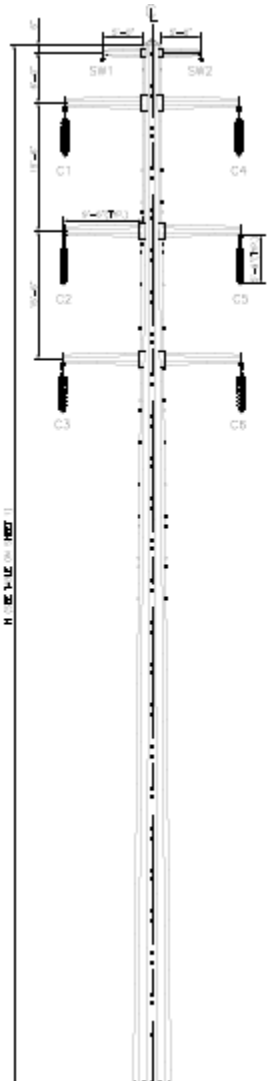


Figure 1: Typical Double Circuit Suspension Structure

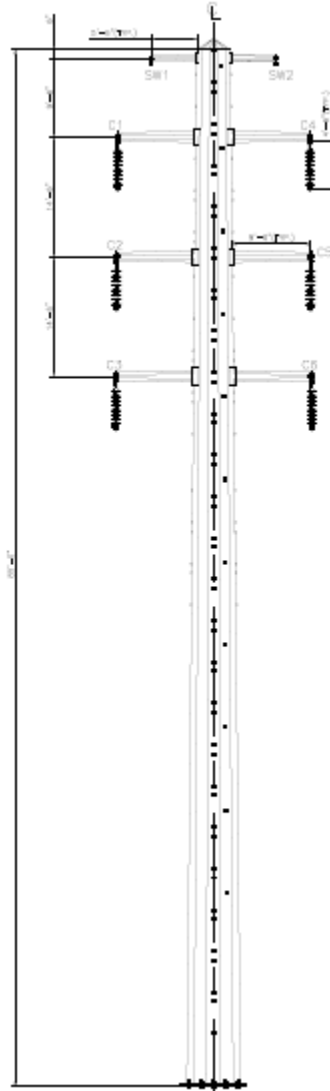


Figure 2: Typical Double Circuit Dead-End Structure

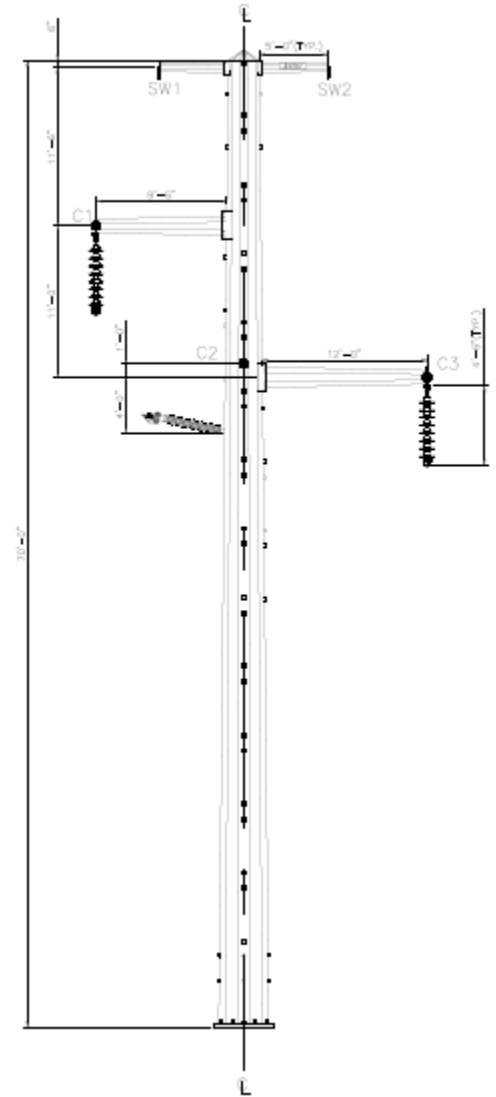


Figure 3: Typical Single Circuit Dead-End Structure



DEPARTMENT OF THE ARMY  
U.S. ARMY INSTALLATION MANAGEMENT COMMAND  
U.S. ARMY GARRISON ABERDEEN PROVING GROUND  
BUILDING 4510, 6429 BOOTHBY HILL AVENUE  
ABERDEEN PROVING GROUND MARYLAND 21005-5001

IMAP-PW

9 May 2019

## MEMORANDUM FOR RECORD:

SUBJECT: Acknowledgement of Baltimore Gas and Electric (BG&E) 115 kV Infrastructure Project

1. In January 2019, Aberdeen Proving Ground (APG), Directorate of Public Works (DPW), personnel were engaged by BG&E Project Staff regarding the proposed upgrades of the 115 kV Infrastructure running along the edge of the Installation's boundary.
2. DPW staff participated in a site visit by BG&E and their contracted engineers. Our Energy Manager and Environmental Staff have a thorough understanding of the project plan and are continuing to support the execution of this project.
3. If there are any questions, the Point of Contact (POC) for the project coordination is Devon Rock, the Installation Energy Manager. She can be reached at 410-306-1125, or [devon.a.rock.civ@mail.mil](mailto:devon.a.rock.civ@mail.mil).

A handwritten signature in black ink, appearing to read "Th P. Kuchar".

THOMAS P. KUCHAR, P.E.  
Director, Public Works