

March 4, 2013

VIA E-Filing

Rosemary Chiavetta, Esquire
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2 North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Docket Nos. A-2012-2340872; A-2013-2341277
PPL Siting; Blue Ridge Eminent Domain Applications**

Dear Secretary Chiavetta:

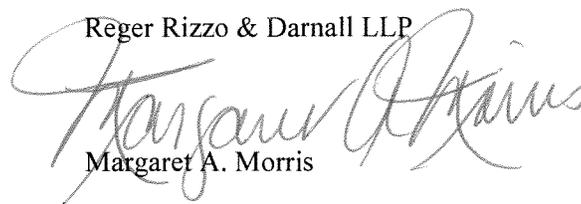
Enclosed for filing is the Prehearing Memorandum of Blue Ridge Real Estate Company (Blue Ridge) in the above-captioned consolidated proceedings.

As indicated on the attached Certificate of Service, a copy of Blue Ridge's Prehearing Memorandum has been provided to the service list in the manner indicated.

If there are any questions, please do not hesitate to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/jmm
Enclosure

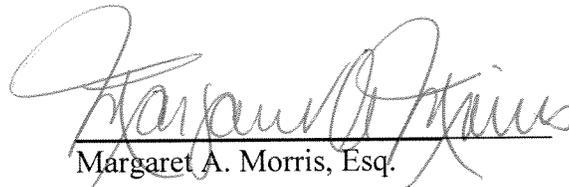
CC: Honorable David Salapa
Service List

**Re: Docket Nos. A-2012-2340872; A-2013-2341277
PPL Siting; Blue Ridge Eminent Domain Applications**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Prehearing Memorandum of Blue Ridge Real Estate Company has been served upon the following persons on the attached service list, by 1st Class Mail (and email if provided) where indicated, in accordance with the requirements of §1.54 (relating to service by a participant).

Dated: March 4, 2013


Margaret A. Morris, Esq.

A-2012-2340872 FOR APPROVAL OF THE SITING AND CONSTRUCTION OF TRANSMISSION LINES ASSOCIATED WITH THE NORTHEAST-POCONO RELIABILITY PROJECT IN PORTIONS OF LUZERNE, LACKAWANNA, MONROE, AND WAYNE COUNTIES, PENNSYLVANIA

P-2012-2340871 - FOR A FINDING THAT A BUILDING TO SHELTER CONTROL EQUIPMENT AT THE NORTH POCONO 230-69 KV SUBSTATION IN COVINGTON TOWNSHIP, LACKAWANNA COUNTY, PENNSYLVANIA IS REASONABLY NECESSARY FOR THE CONVENIENCE OR WELFARE OF THE PUBLIC

P-2012-2341105 - FOR A FINDING THAT A BUILDING TO SHELTER CONTROL EQUIPMENT AT THE WEST POCONO 230-69 KV SUBSTATION IN BUCK TOWNSHIP, LUZERNE COUNTY, PENNSYLVANIA IS REASONABLY NECESSARY FOR THE CONVENIENCE OR WELFARE OF THE PUBLIC

REVISED 1/25/13-EMINENT DOMAIN DOCKETS LISTED WITH PROPERTY OWNER'S ADDRESS

JOHN H ISOM ESQUIRE
CHRISTOPHER T WRIGHT ESQUIRE
POST & SCHELL PC
17 NORTH SECOND STREET
12TH FLOOR
HARRISBURG PA 17101-1601

OFFICE OF SMALL BUSINESS ADVOCATE
COMMERCE BUILDING
300 NORTH STREET SUITE 1102
HARRISBURG PA 17101

PA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
PO BOX 2063
MARKET STREET STATE OFFICE BUILDING
HARRISBURG PA 17105-2063
ATTN: OFFICE OF FIELD OPERATIONS

eServe

PAUL E RUSSELL ESQUIRE
ASSOCIATE GENERAL COUNSEL
PPL SERVICES CORPORATION
TWO NORTH NINTH STREET
ALLENTOWN PA 18101

HONORABLE BARRY J SCHOCH PE SEC
WILLIAM J CRESSLER ESQUIRE
PENN DOT
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET T 9TH FLOOR
HARRISBURG PA 17120

eServe

DAVID B MACGREGOR ESQUIRE
POST & SCHELL PC
FOUR PENN CENTER
1600 JOHN F KENNEDY BOULEVARD
PHILADELPHIA PA 19103-2808

DOUGLAS C MCLEAREN CHIEF
PA HISTORICAL & MUSEUM COMMISSION
BUREAU FOR HISTORIC PRESERVATION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET 2ND FLOOR
HARRISBURG PA 17120-0053

BUREAU OF INVESTIGATION AND
ENFORCEMENT
PA PUBLIC UTILITY COMMISSION
PO BOX 3265
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG PA 17105-3265

LACKAWANNA COUNTY COMMISSIONERS
LACKAWANNA COUNTY ADMIN BLDG
200 ADAMS AVENUE 6TH FLOOR
SCRANTON PA 18503

OFFICE OF CONSUMER ADVOCATE
555 WALNUT STREET
5TH FLOOR FORUM PLACE
HARRISBURG PA 17101-1925

LACKAWANNA COUNTY
PLANNING COMMISSION
135 JEFFERSON AVENUE 2ND FLOOR
SCRANTON PA 18503

LUZERNE COUNTY COUNCIL
LUZERNE COUNTY COURTHOUSE
200 N RIVER STREET
WILKES-BARRE PA 18711

LUZERNE COUNTY
PLANNING COMMISSION
20 N PENNSYLVANIA AVENUE
WILKES-BARRE PA 18711

MONROE COUNTY COMMISSIONERS
1 QUAKER PLAZA ROOM 201
STROUDSBURG PA 18360-2141

MONROE COUNTY
PLANNING COMMISSION
1 QUAKER PLAZA ROOM 106
STROUDSBURG PA 18360-2169

WAYNE COUNTY COMMISSIONERS
WAYNE COUNTY COURTHOUSE
925 COURT STREET
HONESDALE PA 18431

WAYNE COUNTY
PLANNING DEPARTMENT
925 COURT STREET
HONESDALE PA 18431

BEAR CREEK TOWNSHIP
BOARD OF SUPERVISORS
3333 BEAR CREEK BOULEVARD
BEAR CREEK TOWNSHIP PA 18702

BEAR CREEK TOWNSHIP
PLANNING COMMISSION
3333 BEAR CREEK BOULEVARD
BEAR CREEK TOWNSHIP PA 18702

BUCK TOWNSHIP
BOARD OF SUPERVISORS/
PLANNING COMMISSION
114 BUCK BOULEVARD
BEAR CREEK PA 18602

CLIFTON TOWNSHIP
BOARD OF SUPERVISORS
361 SLATE ROUTE 435
CLIFTON TOWNSHIP PA 18424

CLIFTON TOWNSHIP
PLANNING COMMISSION
361 STATE ROUTE 435
CLIFTON TOWNSHIP PA 18424

COVINGTON TOWNSHIP
BOARD OF SUPERVISORS
20 MOFFAT DRIVE
COVINGTON TOWNSHIP PA 18444

COVINGTON TOWNSHIP
PLANNING COMMISSION
20 MOFFAT DRIVE
COVINGTON TOWNSHIP PA 18444

LEHIGH TOWNSHIP
BOARD OF SUPERVISORS
32 SECOND STREET
PO BOX 651
GOULDSBORO PA 18424

LEHIGH TOWNSHIP
PLANNING COMMISSION
32 SECOND STREET
PO BOX 651
GOULDSBORO PA 18424

MADISON TOWNSHIP
BOARD OF SUPERVISORS
3200 MADISONVILLE ROAD
MADISON TOWNSHIP PA 18444

MADISON TOWNSHIP
PLANNING COMMISSION
3200 MADISONVILLE ROAD
MADISON TOWNSHIP PA 18444

PAUPACK TOWNSHIP
BOARD OF SUPERVISORS
25 DANIELS ROAD
LAKEVILLE PA 18438

PAUPACK TOWNSHIP
PLANNING COMMISSION
25 DANIELS ROAD
LAKEVILLE PA 18438

PLAINS TOWNSHIP
BOARD OF SUPERVISORS
126 NORTH MAIN STREET
PLAINS PA 18705

PLAINS TOWNSHIP
PLANNING COMMISSION
126 NORTH MAIN STREET
PLAINS PA 18705

SALEM TOWNSHIP
BOARD OF SUPERVISORS
PO BOX 278
HAMLIN PA 18427

SALEM TOWNSHIP
PLANNING COMMISSION
PO BOX 278
HAMLIN PA 18427

STERLING TOWNSHIP
BOARD OF SUPERVISORS
PO BOX 100
STERLING PA 18463

STERLING TOWNSHIP
PLANNING COMMISSION
PO BOX 100
STERLING PA 18463

THORNHURST TOWNSHIP
BOARD OF SUPERVISORS
HC1 BOX 238-B RIVER ROAD
THORNHURST PA 18424-9313

THORNHURST TOWNSHIP
PLANNING COMMISSION
HC1 BOX 238-B RIVER ROAD
THORNHURST PA 18424-9313

TOBYHANNA TOWNSHIP
BOARD OF SUPERVISORS
105 GOVERNMENT CENTER WAY
POCONO PINES PA 18350

TOBYHANNA TOWNSHIP
PLANNING COMMISSION
105 GOVERNMENT CENTER WAY
POCONO PINES PA 18350

JOHN C AND LINDA S JUSTICE
BISKYN NATIONAL PARK
9700 SW 328TH STREET
HOMESTEAD FL 33033
A-2012-2341107

THREE GRIFFINS ENTERPRISES INC
PO BOX 136
HAMLIN PA 18427-0136
A-2012-2341114

MARGARET G ARTHUR (DECEASED)
AND BARBARA A SAURMAN TRUSTEES OF
THE RESIDUARY TRUST OF
JAMES C ARTHUR
11 BROWNSTONE DRIVE
HORSHAM PA 19044
A-2012-2341115

ANTHONY JR & LILLIAN LUPAS ET AL
17 DOGWOOD DRIVE
LAFLIN PA 18702
A-2012-2341118

ANTHONY JR & LILLIAN LUPAS ET AL
702 WILDFLOWER DRIVE
WILKES BARRE PA 18702

RONALD G & GLORIA SIDOVAR
318 POLK TOWNSHIP ROAD
KUNKLETOWN PA 18058
A-2012-1241120

MICHAEL & JOANNE PALERMO
52 ROWAN AVE
STATEN ISLAND NY 10306-5273
A-2013-2341121

FR FIRST AVE PROP HOLDING LP
311 S WACKER DRIVE STE 4000
CHICAGO IL 60606
A-2012-2341123

TRANSCONTINENTAL GAS PIPELINE CO
PO BOX 2400 MD 46-4
TULSA OK 74102-2400
A-2013-2341208

WILLIAM PETROULEAS &
JOANNA PETROULEAS
5 HELENA ROAD
STATEN ISLAND NY 10304
A-2013-2341209

PETER & FRANCINE PALERMO
36 ROWAN AVE
STATEN ISLAND NY 10306-5273
A-2013-2341211

CHRISTOPHER & MELINDA MAROS
586 TWIN ROCKS RD
NEWFOUNDLAND PA 18445-2156
A-2013-2341213

DIANNE L DOSS
390 NELSON ROAD
MONROE NY 10950-4248
A-2013-2341214

DONALD JANUSZEWSKI
517 LEDGEDALE ROAD
LAKE ARIEL PA 18436-5571
A-2013-2341215

INTERNATIONAL CONSOLIDATED
INVESTMENT COMPANY
C/O ARTHUR KANIA
560 E LANCASTER AVE STE 108
ST DAVIDS PA 19087
A-2013-2341216

BRADLEY D HUMMEL
PO BOX 733
HAMLIN PA 18427-0733
A-2012-2341220

EYLLA HUGHES EST
C/O JUDY SEARFOSS
38 BUCK BLVD
WHITE HAVEN PA 18661-2130
A-2013-2341232

JOHN F AND VERONICA ISKRA
11 GREEN ARROW TRAIL
WHITE HAVEN PA 18661
A-2013-2341233

MICHAEL A & SUE K MITCH
PO BOX 428
TREICHLERS PA 18086-0428
A-2013-2341234

CLIFTON ACRES INC
C/O WAYNE MOORE
159 EAST WALTON PLACE APT 23
CHICAGO IL 60611
A-2013-2341236

DIETRICK HUNTING CLUB
PO BOX 39 HOOPER JOHN
CLIFFORD PA 18413
A-2013-2341237

ART MRTG BORROWER PROPC 2010-5
10 GLENLAKE PKWY S TWR STE 800
ATLANTA GA 30328
A-2013-2341238

NLMS INC
1170 WINOLA RD
CLARKS SUMMIT PA 18411
A-2013-2341239

US INDUSTRIAL REIT II
9830 COLONNADE BLVD STE 600
SAN ANTONIO TX 78230
A-2013-2341241

RONALD SOLT
1200 THORNHURST ROAD
BEAR CREEK TWP PA 18702-8212
A-2013-2341249

MEREL J & ARLENE J SWINGLE
51 SWINGLE LANE
LAKE ARIEL PA 18436
A-2013-2341250

EDWARD R SCHULTZ
RR 1 BOX 1360
GOULDSBORO PA 18424
A-2013-2341253

DONALD W HENDERSON &
LOUIS V BELLUCCI
7044 SC HARBOR CIRCLE
STUART FL 34996
A-2013-2341262

FR E2 PROPERTY HOLDING LP
311 S WACKCR DRSTE4000
CHICAGO IL 60606
A-2013-2341263

SYLVESTER J COCCIA
310 W MARY ST
OLD FORGE PA 18518
A-2013-2341267

LAWRENCE DUDA
30 WILAN LANE
ALBANY NY 12203-4431
A-2013-2341271

ATTY: THOMAS E MARK M AND
J DEAN MACK
C/O HEATHER K
281 PIERCE STREET
KINGSTON PA 18704
A-2013-2341272

BLUE RIDGE REAL ESTATE COMPANY
PO BOX 707
BLAKESLEE PA 18610-0707
A-2013-2341277

JAMES L & MICHAELENE J BUTLER
9414 SOUTH GARY AVENUE
TULSA OK 74137
A-2013-2344353

SUSAN BUTLER REIGELUTH
AVENUE DES CHASSEURS 20
WATERLOO 1410
BELGIUM
A-2013-2344604

GRUMBLE KNOT LLC
2642 ROUTE 940
POCONO SUMMIT PA 18346
A-2013-2344612

PENNSYLVANIA GLACIAL TILL LLC
PO BOX 900
BLAKESLEE PA 18610
A-20132344616

BLUEBERRY MOUNTAIN REALTY LLC
57 SEAVIEW BLVD
PORT WASHINGTON NY 11050
A-2013-2344605

WILLIAM E NEWCOMER
INTERVIVOS TRUST
C/O SUSAN ARZAMENDI EXECUTRIX
74 CHURCH ROAD
SWANTON VT 05488-8056

JAMES J BENDER
97 BENDER DRIVE
COVINGTON TOWNSHIP PA 18424

JOE & VANESSA CAPARO
12 LANGAN ROAD
COVINGTON TOWNSHIP PA 18444
C-2011-2276731

CHRIS & MELINDA MAROS
586 TWIN ROCKS ROAD
NEWFOUNDLAND PA 18445
C-2012-2305047

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities Corporation	:	
Filed Pursuant to 52 Pa. Code Chapter 57,	:	
Subchapter G, for Approval of the Siting and	:	
Construction of Transmission Lines Associated	:	A-2012-2340872
with the Northeast-Pocono Reliability Project	:	
in Portions of Luzerne, Lackawanna, Monroe,	:	
and Wayne Counties, Pennsylvania	:	
	:	
Petition of PPL Electric Utilities Corporation	:	
for a Finding that a Building to Shelter Control	:	
Equipment at the North Pocono 230-69 kV	:	
Substation in Covington Township,	:	P-2012-2340871
Lackawanna County, Pennsylvania is	:	
Reasonably Necessary for the Convenience	:	
or Welfare of the Public	:	
	:	
Petition of PPL Electric Utilities Corporation	:	
for a Finding that a Building to Shelter Control	:	
Equipment at the West Pocono 230-69 kV	:	
Substation in Buck Township, Luzerne	:	P-2012-2341105
County, Pennsylvania is Reasonably Necessary	:	
for the Convenience or Welfare of the Public	:	
	:	
Application of PPL Electric Utilities Corporation	:	
Under 15 Pa. C.S. §1511(c) for a Finding and	:	
Determination that the Service to be Furnished by	:	
the Applicant Through its Proposed Exercise of the	:	
Power of Eminent Domain to Acquire a Certain	:	
Portion of the Lands of the Property Owners Listed	:	
Below for Siting and Construction of Transmission	:	
Lines Associated with the Proposed	:	
Northeast-Pocono Reliability Project in Portions of	:	
Luzerne, Lackawanna, Monroe, and Wayne	:	
Counties, Pennsylvania is Necessary or Proper	:	
for the Service, Accommodation, Convenience	:	
or Safety of the Public	:	
	:	
John C. Justice and Linda S. Justice	:	A-2012-2341107
	:	
Three Griffins Enterprises, Inc.	:	A-2012-2341114
	:	
Margaret G. Arthur and Barbara A. Saurman	:	
Trustees of the Residuary Trust of	:	A-2012-2341115
James C. Arthur	:	
	:	
Anthony J. Lupas, Jr. and Lillian Lupas	:	
John Lupas and Judy Lupas,	:	A-2012-2341118

Grace Lupas, Eugene A. Bartoli and Robert J. Fankelli	:	
	:	
Ronald G. Sidovar and Gloria J. Sidovar	:	A-2012-2341120
	:	
FR First Avenue Property Holding, LP	:	A-2012-2341123
	:	
Transcontinental Gas Pipe Line Corporation	:	A-2013-2341208
	:	
William Petrouleas and Joanna Petrouleas	:	A-2013-2341209
	:	
Peter Palermo and Francine Palermo	:	A-2013-2341211
	:	
Christopher Maros and Melinda Maros	:	A-2013-2341213
	:	
Dianne L. Doss	:	A-2013-2341214
	:	
Donald Januszewski	:	A-2013-2341215
	:	
International Consolidated Investment Company	:	A-2013-2341216
	:	
Bradley D. Hummel	:	A-2013-2341220
	:	
Michael Palermo and Joanne Palermo	:	A-2013-2341221
	:	
Roberta Searfoss a/k/a Judy Searfoss Executrix of the Estate of Euylla Hughes a/k/a Euylla Hughes	:	A-2013-2341232
	:	
John F. and Veronica Iskra	:	A-2013-2341233
	:	
Michael A. Mitch and Sue K. Mitch	:	A-2013-2341234
	:	
Clifton Acres, Inc.	:	A-2013-2341236
	:	
Dietrich Hunting Club	:	A-2013-2341237
	:	
Art Borrower Propco 2010-5 LLC	:	A-2013-2341238
	:	
NLMS, Inc.	:	A-2013-2341239
	:	
US Industrial REIT II	:	A-2013-2341241
	:	
Ronald Solt	:	A-2013-2341249
	:	
Merel J. and Arlene J. Swingle	:	A-2013-2341250
	:	
Edward R. Schultz	:	A-2013-2341253
	:	
Donald W. Henderson and Louis Bellucci	:	A-2013-2341262

Fr E2 Property Holding LP	:	A-2013-2341263
	:	
Sylvester J. Coccia	:	A-2013-2341267
	:	
Lawrence Duda	:	A-2013-2341271
	:	
Mark M. Mack, J. Dean Mack and Heather K. Mack	:	A-2013-2341272
	:	
Blue Ridge Real Estate ¹	:	A-2013-2341277
	:	
James L. and Michaelene J. Butler	:	A-2013-2344353
	:	
Susan Butler Reigeluth Living Trust	:	A-2013-2344604
	:	
Blueberry Mountain Realty, LLC	:	A-2013-2344605
	:	
Grumble Knot, LLC	:	A-2013-2344612
	:	
Pennsylvania Glacial Till, LLC	:	A-2013-2344616
	:	
Chris and Melinda Maros	:	
	:	
v.	:	C-2012-2305047
	:	
PPL Electric Utilities Corporation	:	
	:	
Joe and Vanessa Caparo	:	
	:	
v.	:	C-2012-227 6713
	:	
PPL Electric Utilities Corporation	:	

**PREHEARING MEMORANDUM OF
BLUE RIDGE REAL ESTATE COMPANY**

Pursuant to 52 Pa. Code § 5.222(d), Blue Ridge Real Estate Company (Blue Ridge) hereby submits this Prehearing Memorandum in the above-captioned proceedings. Blue Ridge intends to participate in this proceeding as an active party.

1. HISTORY OF THE PROCEEDINGS

On December 28, 2012, PPL Electric Utilities Corporation (PPL or Applicant) filed an Application at Docket No. A-2012-2340872 (the Siting Application) with the

¹ The correct legal name is Blue Ridge Real Estate Company.

Pennsylvania Public Utility Commission (Commission) requesting authority to locate and construct the Pennsylvania portion of transmission lines associated with the proposed Northeast-Pocono Reliability Project (Northeast Pocono Line). PPL asserts that the Northeast Pocono Line is needed to resolve reliability and planning violations and to reinforce the 69 kV systems serving the Northeast Pocono region by bringing a new 230 kV supply source closer to the growing load centers. As part of the Application, PPL proposed three new transmission lines: (1) Jenkins-West Pocono Line; (2) West Pocono-North Pocono Line; and, (3) North Pocono-Paupack Line.

Separately, also on December 28, 2012, PPL filed two Petitions (the Substation Petitions) at Docket Nos. P-2012-2340871 and P-2012-2341105 requesting that the Commission approve the construction of buildings to shelter control equipment associated with the West Pocono and North Pocono substations, respectively.

Also, PPL filed 32 separate Applications (the Eminent Domain Applications) relating to the proposed exercise of the power of eminent domain arising from the project. Specifically, the Application at Docket No. A-2013-2341277 seeks authorization to utilize eminent domain to take property rights regarding two separate properties owned by Blue Ridge, and the caption mistakenly indicates that these properties are both located in Buck Township, Luzerne County, Pennsylvania². Both the proposed Jenkins-West Pocono Line and the proposed West Pocono-North Pocono Line traverse the property of Blue Ridge. The property also is affected by the proposed location of the West Pocono substation.

Notice of the Applications and Petitions were published in the *Pennsylvania Bulletin* at 43 Pa. B. 397 (January 19, 2013). Blue Ridge filed its Petition to Intervene on February 22, 2012.

² While the caption to the Eminent Domain Application identifies Blue Ridge's affected property as being located in Buck Township, Luzerne County, only one of the two affected Blue Ridge properties (Lot #35) is located in that municipality. The other affected Blue Ridge property (Lot #38) is located in Thornhurst Township, Lackawanna County. The lot numbers for these properties are identified on PPL's Attachment 4, Map Extent 3.

Prehearing Order #1 was issued by Administrative Law Judge David A. Salapa on January 8, 2013, which, *inter alia*, consolidated the Application and two Petitions for the purposes of discovery, litigation and discussion.

On January 25, 2013, PPL filed a Motion to Consolidate the 37 Eminent Domain cases with the Application and 2 Petitions. Prehearing Order #2 granting the requested consolidation was issued by Administrative Law Judge Salapa on January 29, 2013.

2. PETITION TO INTERVENE OF BLUE RIDGE

Blue Ridge filed its Petition to Intervene in the consolidated proceedings on February 22, 2012, as an affected property owner whose rights will be adversely affected if the Commission grants PPL authority to locate, construct and operate both the proposed Jenkins-West Pocono Line and the West Pocono-North Pocono Line. Furthermore, in addition, pursuant to 52 Pa. Code § 57.75(i)(3), as the owner of property which is the subject of the Eminent Domain Application at Docket No. A-2013-2341277, Blue Ridge has automatic standing to participate as a party.

Blue Ridge respectfully request that its Petition to Intervene be granted and that Blue Ridge be granted full party status. Blue Ridge also request that the caption related to the Eminent Domain Application affecting its property, Docket No. A-2013-2341277 be corrected to reflect Blue Ridge's correct legal name, Blue Ridge Real Estate Company.

3. SERVICE ON BLUE RIDGE

Blue Ridge is represented by the undersigned counsel who are authorized to accept service on behalf of Blue Ridge in this proceeding. Blue Ridge requests that the Commission and all parties of record serve copies of all documents electronically on its counsel of record, as well as by hard copy.

4. ANTICIPATED ISSUES AND SUB-ISSUES

Blue Ridge's position in this proceeding is to ensure that PPL's proposed construction has no adverse impact on Blue Ridge's property rights. Due to the early stages of the proceeding, Blue Ridge reserves the right to finalize its position after it has had an opportunity to further evaluate PPL's filings, conduct discovery and review additional information that will be provided, and to raise and/or address additional issues that may be identified by other parties.

5. PROPOSED WITNESSES

Blue Ridge is in the process of evaluating whether it will sponsor testimony in this proceeding. In the event Blue Ridge decides to sponsor testimony, it will inform the parties and Administrative Law Judge Salapa as soon as possible of the intended witness(es) and topic of testimony.

Blue Ridge further reserves the right to participate in this proceeding through the submission of discovery, cross-examination of the parties' witnesses, and the submission of briefs, reply briefs, exceptions and reply exceptions, if necessary.

6. PROPOSED SCHEDULE AND DISCOVERY RULES

Blue Ridge is willing to accept whatever schedule the other parties to this proceeding are willing to arrange, or Administrative Law Judge Salapa otherwise directs. Blue Ridge has reviewed and has no objection to the proposed schedule as set forth in Prehearing Order # 1.

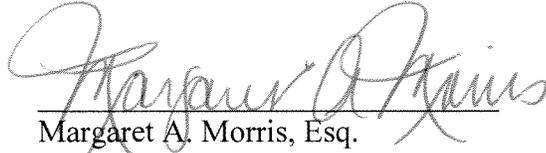
Blue Ridge requests that all parties of record serve copies of all discovery requests and answers electronically on its counsel of record as well as by hard copy.

7. POSSIBILITY OF SETTLEMENT

Blue Ridge generally believes that most, if not all, issues in this proceeding relevant to it are reasonably susceptible to mutual resolution and agrees to participate in any process designed to achieve that goal.

Respectfully submitted,

REGER RIZZO & DARNALL LLP



Margaret A. Morris, Esq.

Attorney-I.D. # 75048

Marlane R. Chestnut, Esq.

Attorney I.D. # 28793

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Dated: March 4, 2013