

R. ANTHONY WALDRON

ATTORNEY-AT-LAW
OFFICES IN
THE HISTORIC HAWLEY SILK MILL
8 Silk Mill Drive - Suite 215, Hawley PA 18428

Fax: (570) 226 6408

February 25, 2013

Rosemary Chiavetta- Secretary Public Utilities Commission PO Box 3265 Harrisburg PA 17105-3265

re: Protests to Application

A-2012-20349762- A-2012-2340872

John C. Justice and Linda S. Justice Property - A – 2012-2341107

AND Ronald G. Sidovar and Gloria Sidovar
Property – A-2012-1241120

Dear Ms. Chiavetta:

I am the attorney for John C. and Linda S. Justice and Ronald G. and Gloria Sidovar.

Enclosed please find two (2) Protests to Application No. A -2012 -2340872; I am filing a Protest on behalf of each of the above-named property owners. Kindly enter my appearance on behalf of these property owners as parties to the Application.

By copy of this letter I am serving copies of both Protests to the Administrative Law Judge, PPL and its General Counsel.

Very truly yours,

R. Anthony Waldron, Esq.

enc.

cc: PPL Electric Utilities Corporation

Paul E. Russell - Associate General Counsel Administrative Law Judge David A. Salapa

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 with the Northeast-Pocono Reliability Project in portions of Luzerne, Lackawanna, Monroe, and Wayne Counties, Pennsylvania

A-2012-2340872

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, Lackawanna County, Pennsylvania is reasonably necessary for the convenience or welfare of the public

P-2012-2340871

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 County, Pennsylvania is reasonably necessary for the convenience or welfare of the public.

P-2012-2341105

PROTEST TO THE APPLICATION A-2012-2340872 FILED BY JOHN C. JUSTICE AND LINDA S. JUSTICE

JOHN C. JUSTICE and LINDA S. JUSTICE, husband and wife, (hereinafter "Justices") hereby submit this Protest to this Application and in support thereof make the following representations:

- 1. Justices are the owners of certain real property located in Salem Township, Wayne County, Pennsylvania, comprising 21.41 acres and identified by Wayne County Tax Parcel No. 22-322-18.02 (hereinafter the "Property").
- 2. The proposed PPL Project involves the installation of transmission lines and a tower on the Property, which is also identified by PPL as A-2012-2341107.
- 3. That PPL has advised Justices that they will need to acquire approximately 5.3 acres of ROW that will cut through the heart of the Property.

SECRETARY S. RUREAU

- 4. That the proposed route of the transmission line across the Property is inappropriate, as there is an existing transmission line ROW nearby that would eliminate crossing the Property and the need for additional towers, by eliminating a 90-degree turn that is proposed on the Property.
- 5. That Justices believe that the proposed Project will not serve the needs of the public in Salem Township, Wayne County, Pennsylvania.
- 6. Justices have standing to protest this Application because their Property will be directly impacted if it is approved.

WHEREFORE, John C. Justice and Linda S. Justice hereby request the Commission either to deny the Application or to require the Applicant to re-locate its transmission lines so that they do not cross the Property.

Respectfully submitted,

R. Anthony Waldron, Esq

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PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU I, R. ANTHONY WALDRON, . ESQ., depose and say that I am the attorney for JOHN C. JUSTICE and LINDA S. JUSTICE, parties to the above captioned action; that Justices are not available to make this verification; that I have consulted with my clients and I am authorized to make this verification on their behalf and that the statements made in the foregoing Protest to the Application are true and correct to the best of my knowledge, information and belief. I understand that false statements made are subject to the penalties of 18 PA C.S.A. 4904, relating to unsworn falsification to authorities.

Date: <u>7/25/1/3</u>

R. ANTHONY WALDRON,

ESO.

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PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I, R. ANTHONY WALDRON, certify that I am this day serving a true and correct copy of the Protest to The Application upon the party(ies) below, by U.S. postage paid first class mail, which service satisfies the PA Rules of Civil Procedure:

Rosemary Chiavetta- Secretary Public Utilities Commission PO Box 3265 Harrisburg PA 17105-3265

PPL Electric Utilities Corporation Two North Ninth St Allentown PA 18101

Paul E. Russell - Associate General Counsel PPL Services Corporation 2 North Ninth St Allentown PA 18101

Administrative Law Judge David A. Salapa P.U.C. PO Box 3265 Harrisburg PA 17105-3265

Date: 2/25

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PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

R. ANTHONY WALDRON

Attorney for John C. Justice and Linda S. Justice

Sup. Court ID 26877

8 Silk Mill Road - Suite 215

Hawley PA 18428 (570) 226 6288