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March 6, 2017

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Application of Transource Pennsylvania, LLC for All of the Necessary Authority, Approvals, and Certificates of Public Convenience (1) to Begin to Furnish and Supply Electric Transmission Service in Franklin and York Counties, Pennsylvania; (2) for Certain Affiliated Interest Agreements; and (3) for any Other Approvals Necessary to Complete the Contemplated Transactions; Docket No. A-2017-2587821

Dear Secretary Chiavetta:

Pursuant to the Notice published in the *Pennsylvania Bulletin* on February 18, 2017, enclosed for filing is the Petition to Intervene of Mid-Atlantic Interstate Transmission, LLC in the above-referenced proceeding.

Please contact me if you have any questions.

Very truly yours,



Teresa K. Schmittberger

Enclosures

c: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania,	:	
LLC for All of the Necessary Authority,	:	
Approvals, and Certificates of Public	:	
Convenience (1) to Begin to Furnish and	:	
Supply Electric Transmission Service in	:	Docket No. A-2017-2587821
Franklin and York Counties, Pennsylvania;	:	
(2) for Certain Affiliated Interest	:	
Agreements; and (3) for any Other	:	
Approvals Necessary to Complete the	:	
Contemplated Transactions	:	

**PETITION TO INTERVENE OF
MID-ATLANTIC INTERSTATE TRANSMISSION, LLC**

Pursuant to Section 52 Pa. Code §§ 5.72–5.74, Mid-Atlantic Interstate Transmission, LLC (“MAIT”) hereby files this Petition to Intervene in the above-captioned proceeding. In support of this Petition, MAIT states as follows:

I. INTRODUCTION

1. On February 7, 2017, Transource Pennsylvania, LLC (“Transource”) filed an Application for All of the Necessary Authority, Approvals, and Certificates of Public Convenience (1) to Begin to Furnish and Supply Electric Transmission Service in Franklin and York Counties, Pennsylvania; (2) for Certain Affiliated Interest Agreements; and (3) for any Other Approvals Necessary to Complete the Contemplated Transactions (“Application”) at the Pennsylvania Public Utility Commission (“PUC” or “Commission”).

2. Notice was published in the *Pennsylvania Bulletin* on February 18, 2017, directing that formal protests and petitions to intervene be filed with the Commission on or before March 6, 2017.

3. MAIT is a certificated public utility providing interstate electric transmission service in Pennsylvania.

4. As proposed, MAIT does not support or oppose the Application. As the Commission proceeding progresses, however, other intervenors may propose changes to the Application that could impact MAIT. Accordingly, MAIT files this Petition to Intervene in the above-referenced proceeding consistent with the Commission's regulations at 52 Pa. Code §§ 5.72–5.74.

II. ELIGIBILITY TO INTERVENE

5. The Commission's regulation at 52 Pa. Code § 5.72 permits a petition to intervene to be filed by a "person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought." 52 Pa. Code § 5.72(a).

6. A party is eligible to intervene under this section where it can demonstrate "an interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.72(a)(2).

7. The Commonwealth Court held that intervention is proper where a party's interest in the proceeding is "substantial, immediate, and direct." *George v. Pa. Pub. Util. Comm'n*, 735 A.2d 1282, 1286 (Pa. Commw. Ct. 1999); *see also Re: Equitable Gas Co.*, 76 Pa. P.U.C. 23 (Opinion and Order dated Jan. 16, 1992).

8. Through its Application, Transource is seeking approval from the Commission to implement a Market Efficiency project, identified as Baseline Upgrade Numbers b2743 and b2752, previously approved by PJM Interconnection, LLC ("PJM"). Application, p. 9. Transource refers

to its work on this project as the Independence Energy Connection Project (“Independence Project”). *Id.* As part of the Independence Project, Transource is tasked with constructing new lines and substations in Pennsylvania and Maryland. *Id.* at 1-2. Under Baseline Upgrade Numbers b2743 and b2752, other utilities will also be responsible for completing additional work and upgrades to support the Independence Project. *See* Application, p. 17, n. 14.

9. In Pennsylvania, Transource is proposing to construct two new substations, the Rice Substation and the Furnace Run Substation. *Id.* at 10.

10. Per the direction of PJM, in order to construct the Rice Substation, MAIT will be required to construct a line between the Hunterstown-Conemaugh 500 kV Transmission Line and the proposed Rice Substation.

11. As part of this proceeding, the Commission will determine whether the Independence Project is “necessary or proper for the service, accommodation, convenience or safety of the public.” 66 Pa. C.S. § 1103. An evaluation of the need for a project in a particular area and the specifications and safety requirements for proposed utility facilities is central to this determination of whether or not a certificate of public convenience is necessary and proper. *See, e.g., Application of Q Water Company, Inc. for a Certificate of Public Convenience Authorizing it to serve portions of Providence and East Drumore Townships, Lancaster County, Pennsylvania; Application of Q Wastewater Company, Inc., for a certificate of Public Convenience Authorizing it to serve portions of Providence and East Drumore Townships, Lancaster County, Pennsylvania, 2004 Pa. PUC LEXIS 127, *20 (Opinion dated Aug. 31, 2004) (holding that an application for a certificate of public convenience is rejected, in part, due to the failure of the applicant to include a full description of the proposed facilities, the manner in which the facilities will be constructed, and facility specification information.)*

12. Accordingly, MAIT has an interest in this proceeding that is substantial, immediate, and direct, and which may not be adequately represented by other participants. MAIT's work is integral to completing the Market Efficiency project for which the Application is sought. The review and disposition of the Application could impact the scope of MAIT's work associated with the connection between the Hunterstown-Conemaugh 500 kV Transmission Line and the proposed Rice Substation. Any modifications made to the Independence Project during this proceeding will directly impact the future work and operations of MAIT. To the extent parties to this proceeding, and ultimately the Commission, agree to changes impacting, among other things, the need for certain facilities or facility location, specifications, safety, accessibility, etc., MAIT's facilities could likewise be impacted. No other party may adequately represent MAIT's interests in this proceeding as no other party is charged with the same work under Baseline Upgrade Numbers b2743 and b2752. MAIT is uniquely impacted by the developments and outcome of this proceeding.

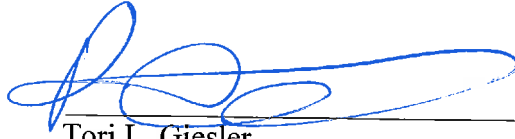
13. As proposed, MAIT does not support or oppose the Application. As the Commission proceeding progresses, however, other intervenors may propose changes to the Application that would impact the scope of MAIT's work in implementing Baseline Upgrade Numbers b2743 and b2752. To the extent changes are proposed, MAIT is seeking party status in order to monitor the proposed changes and modify its business processes accordingly.

14. For these reasons, MAIT's Petition to Intervene should be granted.

III. CONCLUSION

WHEREFORE, Mid-Atlantic Interstate Transmission, LLC respectfully requests that the Commission grant its Petition to Intervene.

Dated: March 6, 2017



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Power Company and West Penn Power Company

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Docket No. A-2017-2587821

VERIFICATION

I, Richard A. Zejka, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904.

3/4/2017

Date

Richard A. Zejka

