



17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166594

May 19, 2017

VIA ELECTRONIC FILING

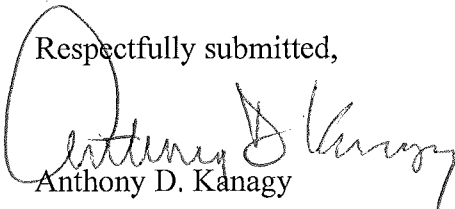
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

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:

Enclosed please find the Motion of Transource Pennsylvania, LLC for Admission *Pro Hac Vice* for Amanda Riggs Conner, Esquire, for the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Anthony D. Kanagy

ADK/skr
Enclosure

cc: Certificate of Service
Honorable Elizabeth Barnes

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

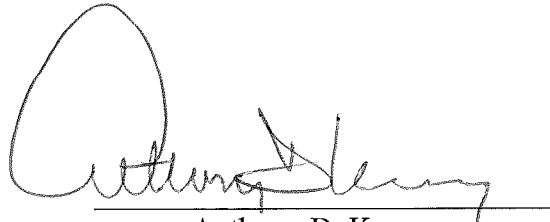
VIA E-MAIL AND FIRST CLASS MAIL

Darryl A. Lawrence, Esquire
Kristine E. Marsilio, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Tori Giesler, Esquire
Teresa K. Schmittberger, Esquire
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
*Counsel for Mid-Atlantic Interstate
Transmission, LLC*

Romulo L. Diaz, Jr., Esquire
Jack R. Garfinkle, Esquire
Michael S. Swerling, Esquire
Jennedy S. Johnson, Esquire
PECO Energy Company
2301 Market Street
Philadelphia, PA 19103
Counsel for PECO Energy

Date: May 19, 2017



Anthony D. Kanagy

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, :
LLC for a Certificate of Public :
Convenience to Begin to Furnish and :
Supply Electric Transmission Service in :
Franklin and York Counties, Pennsylvania :

Docket Nos. A-2017-2587821
 G-2017-2587822

**MOTION OF TRANSOURCE PENNSYLVANIA, LLC FOR
ADMISSION *PRO HAC VICE***

TO ADMINISTRATIVE LAW JUDGE ELIZABETH H. BARNES:

Pursuant to Section 5.103 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.103, and Rule 301(b) of the Pennsylvania Bar Admission Rules, Counsel of Record for Transource Pennsylvania, LLC (“Transource PA” or the “Company”), Anthony D. Kanagy, Esq., respectfully requests that Your Honor enter an Order granting admission *pro hac vice* to Amanda Riggs Conner, Esq., as counsel for Transource PA for all purposes in relation to these proceedings (“Motion”). In support thereof, the Movant, Anthony D. Kanagy, avers as follows:

1. Pursuant to Section 1.24(b)(1) of the Commission’s regulations, 52 Pa. Code § 1.24(b)(1), the Movant has entered his appearance as counsel of record for Transource PA in this proceeding, is an active member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 85522), and is a Principal with Post & Schell, P.C., whose principal office is in Philadelphia, Pennsylvania.

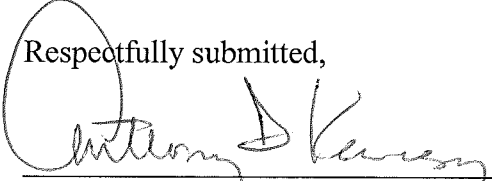
2. Amanda Riggs Conner is a Senior Counsel with American Electric Power Service Corporation, 1 Riverside Plaza, 29th Floor, Columbus, Ohio 43215.

3. Amanda Riggs Conner is a 1999 graduate of the Indiana University School of Law, Bloomington. She has been a member in good standing of the Bar of the District of Columbia since 2003.

4. Amanda Riggs Conner has experience and particular expertise in various aspects of regulatory and energy law, including issues related to electric transmission service, and has appeared in numerous proceedings before the Federal Energy Regulatory Commission. Ms. Riggs Conner has represented American Electric Power and its affiliates in energy regulatory matters for more than five years and has extensive knowledge of their operations, service activities, and regulatory history.

5. Wherefore, Anthony D. Kanagy, Movant and Counsel of Record for Transource PA, respectfully moves for admission of Amanda Riggs Conner, *pro hac vice*, on behalf of Transource PA for all permissible purposes in relation to these proceedings.

Respectfully submitted,



Amanda Riggs Conner (District of Columbia
ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Christopher T. Wright (PA ID # 203412)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: cwright@postschell.com

Date: May 19, 2017

Counsel for Transource Pennsylvania, LLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, :
LLC for a Certificate of Public Convenience :
to Begin to Furnish and Supply Electric : Docket Nos. A-2017-2587821
Transmission Service in Franklin and York : G-2017-2587822
Counties, Pennsylvania :

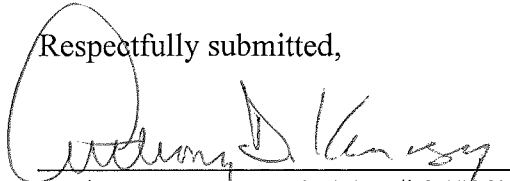
**VERIFIED STATEMENT OF ANTHONY D. KANAGY,
SPONSOR OF AMANDA RIGGS CONNER, FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Anthony D. Kanagy, Esq., a member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 85522), is moving for the admission *pro hac vice* of Amanda Riggs Conner, Esq. in the above-captioned proceeding. In support of the Motion, I, the sponsor, submit this verified statement pursuant to Pa. R.C.P. 1012.1:

1. I have had sufficient opportunity to conduct a reasonable investigation regarding Ms. Conner and can state that she is a reputable and competent attorney.
2. Any proceeds from the settlement of a cause of action in which the candidate is granted admission *pro hac vice* shall be received, held, distributed, and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.
3. I shall remain the attorney of record in this case, as required by the Rules of Civil Procedure.
4. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information, and belief, and that I would be able to prove the same if a hearing were

held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Anthony D. Kahagy", is written over a horizontal line. The signature is somewhat cursive and includes a large, stylized initial "A" at the beginning.

Anthony D Kahagy (PA ID # 85522)

Post & Schell, P.C.

17 North Second Street

12th Floor

Harrisburg, PA 17101-1601

Phone: 717-731-1970

Fax: 717-731-1985

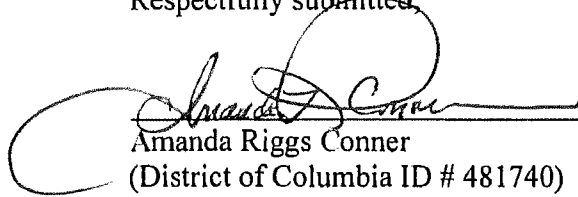
E-mail: akanagy@postschell.com

Date: May 19, 2017

4. I consent to the appointment of the sponsoring attorney, Anthony D. Kanagy, Esq., as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in the matter for which admission *pro hac vice* is sought.

5. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information, and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

Respectfully submitted,



Amanda Riggs Conner
(District of Columbia ID # 481740)
American Electric Power Service Corporation
801 Pennsylvania Ave. NW
Suite 735
Washington, D.C. 20004
Phone: 202-383-3436
Fax: 202-383-3459
E-mail: arconner@aep.com

Date: May 19, 2017