

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, :
LLC filed Pursuant to 52 Pa. Code Chapter :
57, Subchapter G, for Approval of the Siting : Docket No. A-2017-_____
and Construction of the 230 kV Transmission :
Line Associated with the **Independence** :
Energy Connection-West Project in :
Portions of Franklin County, Pennsylvania :

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA” or the “Company”) hereby files, pursuant to 52 Pa. Code § 57.72, this Siting Application requesting Pennsylvania Public Utility Commission (“Commission”) approval of the siting and construction of the Pennsylvania portion of the Rice-Ringgold 230 kV Transmission Line in portions of Franklin County, Pennsylvania. As explained below, the proposed Rice-Ringgold 230 kV Transmission Line is part of the Independence Energy Connection Project (“IEC Project”) approved by PJM Interconnection, L.L.C. (“PJM”) to alleviate transmission congestion constraints and provide reliability benefits in Pennsylvania, Maryland, West Virginia, and Virginia.

The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”). As explained below, Transource PA is obligated

to construct the Pennsylvania portion of the 230 kV transmission lines associated with the IEC Project.

Through this Siting Application, Transource PA seeks Commission approval of the siting and construction of the Pennsylvania portion of the 230 kV line associated with the IEC-West Project.¹ As explained below, Transource PA undertook a detailed analysis of feasible alternatives for the IEC-West Project. The Pennsylvania portion of the Proposed Route selected for the IEC-West Project will be sited to extend approximately 24.4 miles between the Maryland border and the new Rice Substation to be located in Franklin County, Pennsylvania.

Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA's attorneys are:

¹ The Pennsylvania portion of the 230 kV transmission line associated with the IEC-East Project is the subject of a separate Siting Application. As explained in Section IX below, Transource PA is requesting that this Siting Application and the separate Siting Application for the IEC-East Project be consolidated for purposes of hearings, if necessary, and decision.

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Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. Transource PA is a limited liability company organized and existing under the laws of Delaware. Transource PA is a wholly-owned direct subsidiary of Transource Energy, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. On February 7, 2017, Transource PA filed an Application with the Commission requesting all necessary authority, approvals and certificates of public convenience authorizing Transource PA to begin to furnish and supply electric transmission service as a Pennsylvania public utility within two corridors to be located in Franklin and York Counties, Pennsylvania. *See 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 ("Utility Application"). On July 10, 2017, the parties to the Utility Application proceeding filed a settlement agreeing that the Commission

should grant Transource PA's Utility Application. By Initial Decision issued September 14, 2017, the Administrative Law Judge approved the Utility Application as modified by the settlement. As of the time this Siting Application was prepared, Transource PA's Utility Application was pending before the Commission for final approval.

6. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland. Transource PA herein seeks Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.²

7. Accompanying this Siting Application are the following Attachments that provide additional detailed information regarding the proposed Project:

- Attachment 1 Commission Regulation Cross-Reference Matrix
- Attachment 2 Necessity Statement
- Attachment 3 Siting Study
- Attachment 4 Engineering Description
- Attachment 5 List of Owners of Property within the Right-of-Way
- Attachment 6 Agency Requirements
- Attachment 7 List of Governmental Agencies, Municipalities, and Other Public Entities Receiving the Application

² As explained below, the Maryland portion of the IEC-West Project will be constructed and owned by Transource PA's Maryland affiliate.

- Attachment 8 List of Governmental Agencies, Municipalities, and Other Public Entities Contacted
- Attachment 9 List of Public Locations where the Siting Application can be Viewed by the Public
- Attachment 10 Electric and Magnetic Fields Policy and Practices of Transource Pennsylvania and Transource Maryland
- Attachment 11 Vegetation Management
- Attachment 12 Agency Coordination
- Attachment 13 Public Notice Requirements

8. Also accompanying this Siting Application are the following written direct testimonies further explaining and supporting this Application for approval to site and construct the Pennsylvania portion of the 230 kV lines associated with the IEC-West Project:

Transource PA St. No. 1: Peggy I. Simmons, Managing Director Transmission Asset Strategy for AEPSC – Provides an overview of the IEC Project; provides a description of Transource PA and other related entities; describes the process employed by Transource PA in developing, preparing and filing this Siting Application; explains the decision making process within Transource PA for selecting the transmission line route; explains how Transource PA will oversee the construction, operations and maintenance of the IEC Project; and provides a status on the right-of-way acquisitions.

Transource PA St. No. 2: Kamran Ali, Director of Transmission Planning for AEPSC – Explains the need for the IEC Project; describes the IEC Project selected by PJM Interconnection, L.L.C. (“PJM”); and describes the obligation of Transource PA to Complete the Project.

Transource PA St. No. 3: Paul F. McGlynn, Manager in the PJM Transmission Planning Department – Explains the PJM Process; explains the need for the IEC Project; and describes how the IEC Project was selected by PJM

Transource PA St. No. 4: Barry A. Baker, Department Manager for Environmental Services, AECOM – Explains the environmental assessment, siting analysis, public outreach efforts, evaluation of the Alternative Routes, and selection of the Proposed

Route for the new double-circuit 230 kV transmission line associated with the IEC-West Project.

Transource PA St. No. 5: Kent Herzog, Project Manager for Burns & McDonnell – Explains the design features of the IEC-West Project; describes the safety features that will be incorporated into the design of the new 230 kV transmission line.

Transource PA St. No. 6: Thomas Schaffer, Transmission Right of Way Manager for AEPSC – Explains the process used by Transource PA to attempt to acquire the rights-of-way and easements necessary for the IEC-West Project; and provides a summary of the status of negotiations with landowners.

9. This Siting Application, including the accompanying Attachments and Statements, which are incorporated herein by reference, contains all of the information required by 52 Pa. Code §§ 57.72(c), 69.1101, 69.3102 – 69.3107.

II. NEED FOR THE PROJECT

10. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

11. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”).³ The RTEP is an annual planning process that

³ PJM’s RTEP process is currently set forth in Schedule 6 of PJM’s Amended and Restated Operating Agreement (“Schedule 6”). Schedule 6 governs the process by which PJM’s members rely on PJM to prepare an annual regional plan for the enhancement and expansion of the transmission facilities to ensure long-term, reliable electric service consistent with established reliability criteria. In addition, Schedule 6 addresses the procedures used to develop the RTEP, the review and approval process for the RTEP, the obligation of transmission owners to build transmission upgrades included in the RTEP, and the process by which interregional transmission upgrades will be developed.

encompasses a comprehensive series of detailed analyses to ensure electric power continues to flow reliably to customers under stringent reliability planning criteria.⁴

12. In addition to the reliability analysis, PJM's RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies. The electric transmission needs identified in this analysis stem from the fact that the PJM transmission grid provides the means for generators to participate in a competitive wholesale market to supply electricity, both capacity and energy, to customers in PJM's geographic footprint no matter where in this area the electrical load is located.

13. The electric transmission infrastructure needs identified by the PJM Market Efficiency Analysis are addressed by market efficiency transmission projects, which are aimed specifically at improving electric transmission economic efficiencies and alleviating electric transmission constraints that have an economic impact on PJM's wholesale energy or capacity markets.

14. When PJM's Market Efficiency Analysis identifies a need to relieve congestion on electric transmission facilities, PJM opens a Long Term Proposal Window to solicit the submittal of potential solutions (*i.e.*, market efficiency projects) to address those needs. PJM's solicitation of market efficiency project submittals through its Long Term Proposal Window is a competitive process consistent with FERC Order No. 1000.⁵ Potential solutions are evaluated using two criteria: first, the project must address the congestion identified in the Market Efficiency Analysis; and, second, the project benefits must exceed the costs by at least 25

⁴ PJM Manual 14B outlines the RTEP process and reliability criteria used for this process. PJM Manual 14B is available at: <http://www.pjm.com/~media/documents/manuals/m14b.ashx>.

⁵ A summary of FERC Order No. 1000 is available at: <http://www.ferc.gov/industries/electric/indus-act/trans-plan.asp>.

percent.⁶ In addition, the project must meet PJM's congestion criteria and not create additional unacceptable congestion elsewhere on the system.

15. Market efficiency projects that are selected through PJM's Long Term Proposal Window are presented to stakeholders and recommended to the PJM Board of Managers ("PJM Board") for approval. If approved, such market efficiency projects are included in the RTEP as Baseline Projects.

16. Importantly, pursuant to Schedule 6 of PJM's Amended and Restated Operating Agreement, after the PJM Board approves a proposed market efficiency project, the successful project proponent is obligated to complete the project once PJM and the successful entity execute a Designated Entity Agreement, which specifically designates the entity or entities having construction responsibility for the project.

17. In October 2014, PJM opened a Long Term Proposal Window ("2014/15 RTEP Long Term Proposal Window") to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia.⁷ In response, Transource Energy, the parent of Transource PA, submitted "Project 9A." The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM's 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most

⁶ Project benefits are measured by comparing the benefits in the form of net load payments and/or production costs with and without the proposed project for a 15-year study period. The economic benefit/cost ratio threshold test is set forth in PJM Manual 14B, Attachment E, available at: <http://www.pjm.com/~media/documents/manuals/m14b.ashx>.

⁷ See PJM, LLC, "PJM RTEP - 2014/15 RTEP Long Term Proposal Window Problem Statement & Requirements Document," Version 2 (Oct. 30, 2014), available at <https://www.pjm.com/~media/planning/rtep-dev/expan-plan-process/ferc-order-1000/rtep-proposal-windows/2014-15-rtep-long-term-proposal-window-problem-statement-and-requirements-document.ashx>.

production cost savings.⁸ On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.⁹

19. Although the primary benefits from the IEC Project relate to market efficiency and the reduction of congestion costs, the new transmission facilities associated with the IEC Project will also enhance the electrical strength and reliability of the transmission system by virtue of the new transmission facilities in the area that will be part of the interconnected transmission grid. The IEC Project will provide additional and alternative paths for electricity in the event of outages on other Pennsylvania transmission facilities. The IEC Project will also allow the interconnection of future reliability, generation, and load projects in the area.

20. Pertinent to this Application, the IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

21. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000.¹⁰ Pursuant to Schedule E of the FERC-approved Designated Entity

⁸ The recommendation of PJM staff to approve the IEC Project is available at: <http://www.pjm.com/~media/committees-groups/committees/teac/20160811/20160811-board-whitepaper-august-2016.ashx>.

⁹ PJM's 2014/2015 RTEP Baseline Upgrade Numbers b2743 and b2752 also includes upgrades to the existing Conastone and Ringgold Substations in Maryland and reconductoring of the Conastone-Northwest double-circuit 230 kV line and the Ringgold-Catoctin 138 kV line in Maryland. The upgrades to these existing facilities will be the responsibility of the incumbent utilities.

¹⁰ FERC's order approving the Designated Entity Agreement is available at:

Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA's Maryland affiliate, Transource Maryland, LLC ("Transource MD"), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

22. Accordingly, pursuant to Schedule 6 of PJM's Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

23. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA to complete the Pennsylvania portion of the IEC Project are provided in Attachment 2 to the this Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn, Transource PA Statement Nos. 2 and 3.

HI. DESCRIPTION OF THE PROPOSED PROJECT

24. The IEC Project approved by PJM involves: (i) construction of two new substations in Pennsylvania, the Rice Substation and the Furnace Run Substation; and (ii) construction of two new overhead double-circuit 230 kV interstate transmission lines, the Rice-Ringgold 230 kV Transmission Line and the Furnace Run-Conastone 230 kV Transmission Line.

25. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 miles, connecting the existing Ringgold Substation located near Smithsburg, Washington County, Maryland, and the new Rice

https://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20170112-3047

Substation to be located in Franklin County, Pennsylvania. This transmission line project is referred to as the IEC-West Project and is the subject of this Siting Application.¹¹

26. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation. Transource PA will construct, own, operate, and maintain the Pennsylvania portion of the Rice-Ringgold 230 kV Transmission Line, and Transource MD will construct, own, operate, and maintain the Maryland portion of the line.

27. A map of the proposed IEC-West Project is provided in Attachment 2 to this Siting Application.

28. The Pennsylvania portion of the new IEC-West Project will require the installation of approximately 162 structures with an average height of 135 feet. Approximately 2 to 4 taller structures (up to approximately 250 feet) may be used in certain locations to maintain appropriate clearances for certain structures and existing utility facilities. The spans between the structures will be approximately 800 feet.

29. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures. In certain areas, steel lattice structure may be used to better accommodate topographical, construction, or land use constraints. Depictions of typical structures to be used for the IEC-West Project are provided in Attachment 4 to this Siting Application.

¹¹ The new Furnace Run-Conastone 230 kV Transmission Line will be sited to extend approximately 16 miles, connecting the existing Conastone Substation located near Norrisville, Harford County, Maryland, and the new Furnace Run Substation to be located in York County, Pennsylvania. Transource PA will construct, own, operate, and maintain the Pennsylvania portion of the Furnace Run-Conastone 230 kV Transmission Line, and Transource MD will construct, own, operate, and maintain the Maryland portion of the line. This transmission line project is referred to as the IEC-East Project and is the subject of a separate Siting Application.

30. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The 230 kV double-circuit design will utilize twelve power conductors, with two conductors used for each of the six phase positions, and two overhead ground wires. An engineering description of the conductors and overhead ground wires is provided in Attachment 4 to the Siting Application.

IV. SITING ANALYSIS

A. SUMMARY OF THE SITING ANALYSIS

31. In accordance with the Commission's regulations at 52 Pa. Code § 57.72(c), Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The Siting Study for the IEC-West Project is provided in Attachment 3 to this Siting Application.

32. The Siting Study was used to develop feasible Alternative Routes, evaluate potential impacts associated with the Alternative Routes, and identify a Proposed Route to be constructed to meet the need for the IEC-West Project. The Siting Study provided Transource PA with a means to assess the human/built, environmental, engineering, and constructability variables associated with the different Alternative Routes so that a Proposed Route could be determined for the IEC-West Project.

33. Many sources of information were used to develop data for the Siting Study. These sources of information are summarized in Attachment 3 to this Siting Application.

34. The Siting Team also used a series of general siting guidelines and factors to direct the development, evaluation, and ultimate selection of routes. Using these routing guidelines and factors, the Siting Team identified opportunity and constraint features within the Study Area that would minimize potential impacts to the natural and human/built environments. Details of the opportunity and constraints used to develop the Alternative Routes are included in Attachment 3 to the Siting Application.

35. The route development process is inherently iterative with modifications made throughout the siting analysis as a result of the identification of new constraints, input from agencies, landowners, and other stakeholders, periodic re-assessment of routes with respect to the siting guidelines and factors, and adjustments to the overall route network to develop feasible Alternative Routes.

36. Once the Alternative Routes were identified, the Siting Team undertook a quantitative and qualitative analysis of potential impacts of each Alternative Route to the human/build environment, the natural environment, and engineering considerations. The Alternative Routes were reviewed in detail and compared using a combination of information collected in the field, Geographic Information System (“GIS”) data sources, public and agency input, engineering and constructability considerations, and the collective knowledge and experience of the Siting Team.

37. Using the quantitative and qualitative analysis described above, the Siting Team selected a Proposed Route that, on balance, best minimized the overall impacts of the project. The rationale for selecting the Proposed Route was derived from the accumulation of the siting decisions made throughout the process, the knowledge and experience of the Siting Team,

comments from the public and regulatory agencies, and the comparative analysis of potential impacts of each Alternative Route.

38. A detailed description of the process used to select the Proposed Route for the IEC-West Project is provided in Attachment 3 to the Siting Application.

B. SELECTION OF THE PROPOSED ROUTE

39. Using the siting process described above, the Siting Team identified three (3) Alternative Routes for the IEC-West Project: Alternative Route A, Alternative Route B, and Alternative Route C.

40. Alternative Route A extends approximately 30.4 miles (approximately 23.8 miles in Pennsylvania and approximately 6.6 miles in Maryland). Alternative Route B extends approximately 31.9 miles (approximately 25.3 miles in Pennsylvania and approximately 6.6 miles in Maryland). Alternative Route C extends approximately 28.8 miles (approximately 24.4 miles in Pennsylvania and approximately 4.4 miles in Maryland). A detailed description of these three Alternative Routes is provided Attachment 3 to this Siting Application.

41. The Siting Team undertook a qualitative and quantitative review and comparison of each Alternative Route. A detailed explanation of the qualitative and quantitative analysis and comparison of the Alternative Routes is provided in Attachment 3 to this Application.

42. As part of the review and comparison of the Alternative Routes, Transource PA conducted a public outreach program, which included two rounds of public open houses and a project website to inform the public about the IEC-West Project and obtain information from landowners about their properties. Feedback provided by the public was taken into consideration as the Siting Team analyzed the Alternative Routes. A summary of Transource PA's public outreach efforts is provided in Attachment 3 to this Siting Application.

43. The Alternative Routes were compared and a Proposed Route was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the Siting Team selected Alternative Route C as the Proposed Route for the proposed IEC-West Project.

44. The Proposed Route extends approximately 28.8 miles (approximately 24.4 miles in Pennsylvania and approximately 4.4 miles in Maryland). A general description of the Proposed Route is provided below:

- The Proposed Route exits the Rice Substation from the southwest corner and heads south, paralleling the east side of I-81 and spanning along the edge of agricultural fields for approximately 2.2 miles; along this stretch the Proposed Route crosses Mountain Run, designated a Coldwater Fishery (“CWF”).
- The Proposed Route turns sharply east to cross SR 696 perpendicularly and travels approximately 0.6 mile to the east-southeast through an agricultural field before turning sharply to the southwest.
- Travelling southwest for 0.7 mile, the Proposed Route crosses Phillaman Run (CWF) and then crosses Black Gap Road (SR 997) in a perpendicular fashion. The Proposed Route traverses for 0.6 mile around the perimeter of the Chambersburg Mall, generally following the outer edge of the parking lot on the northern and eastern sides of the mall, and then heading west to parallel with I-81 again.
- After reaching the eastern side of I-81, the Proposed Route turns sharply south, and parallels the interstate for approximately 1.4 miles and at this location I-81 and the route generally travel in a western direction. Along this section, the Proposed Route traverses the edge of agricultural fields and crosses an unnamed stream (CWF) and the Conococheague Creek (CWF).
- The Proposed Route turns sharply to the southwest and travels 0.4 until it reaches the existing FirstEnergy Corp. (“FE”) Letterkenny-Grand Point 138 kV transmission line. The route stays to the east of this system and parallels it south for approximately 1.6 miles toward U.S. Route 30, spanning along agricultural fields, around the Grand Point Substation, and over Walker Road. The Lost Acres Airport is located approximately 0.6 mile west of the route.
- Prior to crossing commercial lined U.S. Route 30, the Proposed Route first crosses over to the west side of the transmission line, which is now the FE Grand Point-Allegheny Energy 138 kV line, and then spans the highway. The route turns sharply

west and then south for 0.5 miles spanning across a parking lot and bypassing around a commercial building. After going around the building, the route again parallels the FE Grand Point-Allegheny Energy 138 kV line for 0.5 mile.

- The Proposed Route deviates from the transmission line corridor for 1.1 mile to bypass around homes along the line. Along this section, the route extends to the southwest and spans Falling Spring Branch (a High Quality-Cold Water Fishery), crosses Falling Spring Road, and traverses through a forested area where homes are present to the east. Within the forest, the route turns south, travels across an agricultural field and spans the FE Grand Point-Allegheny Energy 138 kV line near Henry Lane.
- After crossing this road, the Proposed Route extends to the southeast for approximately 4.6 miles over agricultural fields to Yohe Road, where it intersects with the FE Fayetteville-West Waynesboro 138 kV transmission line. This section involves crossing of two unnamed WWF streams, one CWF stream, several local roadways, and the FE Fayetteville-Allegheny 69 kV line.
- As the Proposed Route crosses Yohe Road, it also spans to the east side of the FE Fayetteville-West Waynesboro 138 kV transmission line and then turns sharply to the south to parallel this existing line for approximately 1.7 mile; an unnamed CWF stream is crossed in this section, as is Stamey Hill Road.
- A 0.6 mile deviation from the colocation is required in the vicinity of the Manheim Road crossing due residential development that has built up adjacent to the transmission line and the route then parallels the existing line for 0.5 miles on the eastern side.
- At Hess Benedict Road, the Proposed Route crosses over to the west side of the FE Fayetteville-West Waynesboro 138 kV transmission line to avoid agricultural and residential structures. The route parallels the line for another 3.7 miles, traversing agricultural fields, crossing Orphanage Road, Wayne Highway (SR 316), and Buchanan Trail East (SR 16), as well as an unnamed CWF stream.
- After crossing SR 16 and spanning the FE Antrim-West Waynesboro 69 kV lines, the Proposed Route turns sharply to the west and parallels this line for approximately 0.4 mile. This stretch includes a crossing of Cold Springs Road and an unnamed CWF stream.
- Turning to the south and then east, the Proposed Route extends for 1.2 miles to Marsh Road. The route traverses an agricultural field to avoid agricultural and residential structures, and crosses an unnamed CWF stream, the FE Reid-West Waynesboro 69 kV line, and the FE Ringgold-West Waynesboro 138 kV line.
- After crossing Marsh Road and an unnamed CWF stream, the Proposed Route turns sharply south to parallel the east side of the FE Ringgold-West Waynesboro 138 kV line for 2.1 miles. The Proposed Route crosses agricultural fields, Hagerstown Road

(SR 316), the FE West Waynesboro-East Waynesboro 138 kV line, and the West Branch Antietam Creek (CWF) along this stretch. The route extends away from the transmission line corridor to avoid residential structures near the southern end of this section prior to crossing Lyons Road.

- Spanning to the west side of the FE Ringgold-West Waynesboro 138 kV line, the Proposed Route turns south and crosses the Pennsylvania/Maryland state line. The route generally parallels the transmission line for approximately 2.6 miles until it intersects with Gardenhour Road. Some deviations are required along this stretch to avoid agricultural operations and structures. The route in this section crosses Rocky Forge Road, Ringgold Pike (SR 418), Poplar Grove Road, and Newcomer Road, as well as numerous crossings of various tributaries to Little Antietam Creek.
- The Proposed Route crosses Gardenhour Road paralleling the existing transmission line for 0.4 miles and traverses through an orchard.
- The Proposed Route extends out for 0.6 mile to the southwest from the transmission line to bypasses around residential structures along Rowe Road and traverses agricultural lands before spanning over to the south side of the FE Reid-Ringgold 138 kV transmission line.
- The Proposed Route turns east for 0.8 mile and extends into the southeastern corner of the Ringgold Substation, spanning the FE Ringgold-East Hagerstown 138 kV transmission line and Smithsburg Pike (MD 64) along the alignment.

45. The Siting Team determined that the cumulative environmental, human/built, engineering, and constructability impacts associated with the Proposed Route, Alternative Route C, will be significantly less than the other Alternative Routes. A detailed explanation of the selection of the Proposed Route is provided in Attachment 3 to this Application.

V. RIGHTS-OF-WAY

46. Transource PA's standard right-of-way width for a double circuit 230 kV transmission line is 130 feet, 65 feet either side of the proposed centerline of the transmission line. The right-of-way is determined by the structure type, design tensions, span length, and conductor "blowout" (the distance the wires are moved by a crosswind).

47. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

48. There are a total of 119 different owners (99 in Pennsylvania) of 147 deeded properties (123 in Pennsylvania) along the route selected for the proposed IEC-West Project. Detailed maps showing the properties traversed by the right-of-way for the proposed IEC-West Project are provided at the end of Attachment 3 to this Siting Application.

49. Prior to attempting to contact landowners, Transource PA provided packets of information to fully notify landowners that Transource PA plans to negotiate to acquire additional rights-of-way and easements. This packet of information provided the notices and information required by the Commission’s regulations at 52 Pa. Code § 57.91 and 69.3102.

50. A description of the process Transource PA utilizes to attempt to acquire rights-of-way and easements for the transmission lines associated with the IEC-West Project is provided in Transource PA Statement No. 6.

51. PJM approved the IEC Project on August 2, 2016, with an in-service date of June 1, 2020. Following PJM’s approval, Transource PA began the lengthy and detailed process to develop and identify feasible Alternative Routes and ultimately select a Proposed Route for the IEC-West Project. The Proposed Route was selected in late October 2017. Because the Proposed Route was only recently identified, Transource PA has not yet been able to complete negotiations and acquire the rights-of-way needed for the IEC-West Project.

52. Additionally, at the time it prepared this filing, Transource PA’s status as a Pennsylvania public utility was pending before the Commission. As a result, Transource PA did

not have the access and survey rights granted to Pennsylvania utilities under Section 309 of the Pennsylvania Eminent Domain Code, 26 Pa.C.S. § 309, when it prepared this Siting Application. The lack of utility status has delayed Transource PA's ability to access land, complete negotiations, and acquire the rights-of-way needed for the IEC-West Project.

53. Given the construction schedule and in-service date for the IEC-West Project, it is necessary for Transource PA to file this Siting Application as it continues right-of-way negotiations with landowners.

54. Transource PA will continue to negotiate with all affected landowners in an effort to reach a reasonable and mutually acceptable right-of-way agreement and, thereby, avoid the need to condemn rights-of-way across the properties traversed by the IEC-West Project.

55. In the event that Transource PA is unable to acquire the rights-of-way needed for the IEC-West Project, Transource PA will promptly file separate applications seeking Commission approval to exercise of the power of eminent domain to acquire rights-of-way and easements for the proposed IEC-West Project. If any such condemnation applications become necessary, Transource PA will request that they be consolidated and considered together with this Siting Application for the IEC-West Project.

VI. HEALTH AND SAFETY

56. The proposed IEC-West Project will not create any unreasonable risk of danger to the public health or safety.

57. The new 230 kV transmission line associated with the IEC-West Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable NESC minimum standards and all applicable legal requirements.

58. In addition to meeting the NESC standards, the IEC-West Project will also be designed to meet the recommendations outlined in the American Society of Civil Engineers (ASCE) Manual 74 (“Guidelines for Electrical Transmission Line Structural Loading”).

59. A description of Transource PA’s safety and design practices that will be incorporated into the IEC-West Project is provided in Attachment 4 to this Siting Application.

60. Attachment 10 accompanying this Application explains Transource PA’s standards for Electric and Magnetic Fields Policy and Practices, which will be applied to the IEC-West Project.

61. Transource PA is responsible for the safe operation and maintenance of its facilities and, therefore, is directly responsible for the management and maintenance of tall growing vegetation that could potentially effect the safe and reliable operation of its transmission lines. Attachment 11 accompanying this Siting Application explains Transource PA’s vegetation management practices that will be applied to the IEC-West Project.

62. Although the Proposed Route will traverse certain facilities, the IEC-West Project will not interfere with the operation of any communication towers, pipelines, or other utilities. Transource PA will work with the incumbent utilities to ensure proper clearances in order to safely operate and maintain the facilities.

63. Several major roadways will be spanned by the proposed IEC-West Project. If necessary, Pennsylvania Department of Transportation (“PennDOT”) Highway Occupancy Permits or equivalent type permits will be acquired by Transource PA for these major highways and all other state roads prior to construction.

64. The Lost Acres Airport is located approximately 0.6 miles west of the Proposed Route for the IEC-West Project. Transource PA does not anticipate any interference with airport

operations. However, if necessary, Transource PA will file all required documentation with the Federal Aviation Administration and the Pennsylvania Department of Transportation, Bureau of Aviation.

VII. COST AND IN-SERVICE DATE

65. The current estimated cost for the total IEC Project is approximately \$230 million. The estimated cost for the IEC-West Project is approximately \$132 million, which includes approximately \$47 million for substation work and approximately \$85 million for the new Rice-Ringgold 230 kV Transmission Line.

66. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

VIII. NOTICE AND SERVICE

67. As part of the review and comparison of the Alternative Routes, Transource PA conducted a public outreach program, which included two rounds of public open houses and a project website to inform the public about the Project and obtain information from landowners about their properties. Feedback provided through these outreach efforts was taken into consideration as the Siting Team analyzed the Alternative Routes and selected the Proposed Route for the IEC-West Project.

68. Prior to and subsequent to the open houses, Transource PA received and responded to comments from residents and other interested parties. Transource PA will continue responding to comments and inquiries, and provide periodic updates to residents and other

interested parties. Transource PA will continue its commitment of open communications and, where practical, will be responsive to input regarding the IEC-West Project from local residents and other interested parties.

69. A detailed explanation of Transource PA's public outreach efforts is provided in Attachment 3 to this Siting Application.

70. Transource PA has provided public notices in accordance with Sections 57.91 and 69.3102 of the Commission's regulations, 52 Pa. Code §§ 57.91, 69.3102. The public notices for this project are provided in Attachment 13 to this Application.

71. Copies of this Siting Application and Notices of Filing are being served in accordance with the provisions of Section 57.74 of the Commission's regulations, 52 Pa. Code § 57.74.

72. As soon as practicable after the filing of this Application, Transource PA will publish notice of the filing in newspapers of general circulation in the area of the proposed IEC-West Project. This notice will: (a) note the filing with the Commission; (b) provide brief description of the IEC-West Project and its location; (c) provide area locations where the complete application may be reviewed by the public; and (d) provide any additional information as directed by the Commission.

73. Transource PA also requests that the Commission publish notice of this Siting Application in the Pennsylvania Bulletin.

IX. RELATED PROCEEDINGS

74. Contemporaneously with the filing of this Application, Transource PA is filing the "Application of Transource Pennsylvania, LLC filed Pursuant to 52 Pa. Code Chapter 57,

Subchapter G, for Approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-East Project in Portions of York County, Pennsylvania” (the “IEC-East Application”) with the Commission. Therein, Transource PA is requesting approval to site and construct the Pennsylvania portion of the 230 kV transmission line associated with the IEC-East Project.

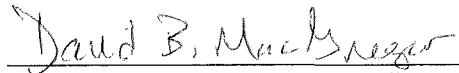
75. Issues related to the need for the IEC-East Project are interrelated with this Siting Application. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated for purposes of hearings, if necessary, and decision.

76. As explained above, Transource PA has not yet been able to complete negotiations and acquire the rights-of-way needed for the IEC-West Project, and will continue to negotiate with all affected landowners in an effort to reach a reasonable and mutually acceptable right-of-way agreement. In the event that Transource PA is unable to acquire the rights-of-way needed for the IEC-West Project, Transource PA will promptly file separate applications seeking Commission approval to exercise of the power of eminent domain to acquire rights-of-way and easements for the proposed IEC-West Project. If any such condemnation applications become necessary, Transource PA will request that they be consolidated and considered together with this Siting Application for the IEC-West Project.

X. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Siting Application with the IEC-East Application contemporaneously filed herewith; and (2) approve the siting and constructing of the Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project in portions of Franklin County, Pennsylvania as explained above and in the Attachments and Testimony submitted in support of this Siting Application.

Respectfully submitted,



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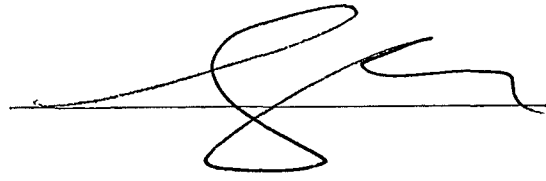
Date: December 27, 2017

Attorneys for Transource Pennsylvania, LLC

VERIFICATION

I, Antonio P. Smyth, being the President at Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 12/26/17



AP Smyth
Legal