2/10/2018

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

Re: Application of Transource Pennsylvania, LLC Filed Pursuant to 52 Pa. Code Chapter 57, Supchapter 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

Application of Transource Pennsylvania, LLC Filed Pursuant to 52 Pa. Code Chapter 57, Supchapter G, for Approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project in Portions of Franklin County, Pennsylvania

Docket Nos. A-2017-2640195
A-2017-2640200

Dear Secretary Chiavetta:

I am writing to protest the installation of the Independence Energy Project/Transource transmission lines through privately-owned lands in Harford County, MD and York County, PA.

I have been involved with the community against this project since June 2017 when I was informed by my neighbors that their land was going to be taken to be used for the installation of a market efficiency transmission line. One of these landowner's property is adjacent to mine and is on the final line proposed for the project. My husband and I built our house to take full advantage of the view from our back windows over our property and the adjacent property affected. If this line goes through, not only will our view be affected, but our property value will plummet. We have spent 33 years living on this land, restoring it from eroded, overused land to an area that now includes over 100 planted native trees, a restored wetland conservation area, and over 10 acres of planted and managed pasture. We saved for many years and built a new house on the property that overlooks the hard work we put in over all this time. We can now look forward to a view of either 135 foot tall lattice towers, emitting EMFs and stray shocks (admitted on PJM's own website despite Transource's claims of neither), or huge horribly ugly rusty monopoles that stick out from the landscape like sore thumbs. Neither are acceptable to look at or live near for the rest of our lives that we hoped to live out on the land we restored.

What has appalled me the most during this long process is that Transource and PJM do not care about anything other than their own profit. Their condescending attitudes to the landowners in this area are right out of the conventions they attend that have courses with titles like "How to deal with Mayberry." They have treated the people in this community with disdain and have assumed we are ignorant peasant people who are easily misled by lies and threats.

First, let's address their ridiculous argument of congestion and gridlock as the need for this transmission line:

What is congestion in the world of electric power? Not what you might think. From PJM's own papers published on their website:

"Heavy use of the electricity grid produces congestion, a situation in which the lowest-priced electricity can't flow freely to a specific area. PJM Interconnection's locational marginal pricing system takes account of congestion in determining wholesale electricity prices. It reflects the value of the energy at the specific location and time it is delivered.

- When the lowest-priced electricity can reach all locations, prices are the same across the entire PJM grid.
- When there is heavy use of the transmission system, the lowest-priced energy cannot flow freely to some locations.
- In that case, congestion costs are incurred as more expensive but advantageously located electricity is ordered to meet the demand.
- As a result, electricity prices are higher on the receiving end of the congestion and lower on the sending end.

Congestion – heavy use of the transmission system in an area – generally raises the electricity price in the receiving area of the congestion and lowers the price in the sending area. Operating conditions such as generation patterns, load levels and transmission outages can cause congestion and result in electricity price changes.

The locational marginal prices send price signals that identify congestion and encourage the development of new transmission facilities, new generation or demand-response initiatives in areas where congestion is common."
(https://www.pjm.com/~/media/about-pjm/newsroom/fact-sheets/congestion-fact-sheet.ashx)

In other words, when there is heavy use within the system, higher priced energy has to be used. This is what PJM means by congestion - it is **NOT** a lack of power to the grid, which is how Transource presented the need for the new transmission lines to the stakeholders at their town meetings.

How is this connected to power plants in Maryland?

At our first Stop Transource information table at Old Tyme Days in Fawn Grove, PA, I talked with two men who were connected with power plants in Maryland. Three primarily coal-fired plants, originally owned by Constellation Energy, then sold to Exelon in 2012, then sold to Raven Power Holdings LLC of Riverstone Holdings LLC later in 2012, are located near Glen Burnie and Bowley's Quarters, Maryland. The three plants (Brandon Shores Generating Station, C.P. Crane Generating Station, and Herbert A. Wagner Generating Station employ about 420 workers. These are coal-fired plants that are under stringent and expensive Maryland clean air regulations. Nearly 1 billion dollars was spent a few years ago to upgrade technology to reduce nitrogen oxides, sulfur dioxide, and mercury from the Brandon Shores plant emissions. The electrical output of these three generating stations is dispatched by the PJM Interconnection regional transmission organization. The two gentlemen that I spoke to said that if the transmission lines are built from Conastone to new substations located in Pennsylvania, at least two of these power generating plants will most likely be shut down because the electricity they generate is more costly than electricity generated in PA, putting over several hundred employees out of work.

This website explains the idea of congestion and the reasoning behind the construction of new lines (emphasis in the quote below is my own): http://www.genscape.com/blog/brandon-shores-greatertransparency-insight-expected-west-hub-congestion-traders

"Having monitors on the Brandon Shores facility instantly brings increased transparency to WHUB Traders as it is essential to understanding congestion in BGE. As excess power flows south onto a constrained network serving load in Baltimore and DC, the transmission lines will overload causing congestion on Bagley-Graceton (when the line is in service) and Conastone-Northwest (when the line is on outage). With ongoing work on Bagley-Graceton as a parallel line is currently being built, outages on the surrounding network continue to make BGE volatile and the most expensive zone. Brandon Shores alleviates congestion on Bagley-Graceton 230kV and Conastone-Northwest 230kV, which are the most frequently binding and costly constraints in PJM. Any loss of output at Brandon Shores can result in very expensive dispatch, and **having this generation output will help Traders stay ahead.**

To get an idea of how important Brandon Shores is to congestion in BGE and WHUB, we can look back at the morning of October 14, 2015 when Brandon Shores had tripped offline in HE 8. West Hub 5 minute prints went from

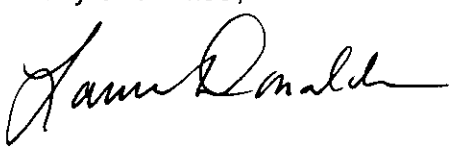
$32 at 7:45 to $267 within the next 10 minutes, while Conastone-Northwest shadow prices went from $62 to $1,732 during the same time interval."

So the point here is that the reason behind the construction of these transmission lines is to allow PJM to distribute cheaper energy. These benefits are not passed to the consumer but to the "power markets" - a network of huge power holding companies that trade on predicted and used energy.

"Looking at the map on the right (see website above) displaying Real-Time generation less Real-Time load from January 2016 - March 2016 in GWhs, the green zones such as AEP, PENELEC, and PPL have excess generation relative to load, and thus send additional power east to the more generation deficient zones such as PEPCO and BGE. The two zones have a combined generation capacity of 10.5 GWs, while last summer the PEPCO and BGE combined loads peaked at 12.6 GWs. Brandon Shores accounts for 12 percent of the combined capacity in the two zones, and is thus a critical baseload unit. Any further under-commitment in these zones will result in significantly more expensive energy costs and congestion."

Bottom line: It is all about the cost of energy within these energy brokerages and has nothing to do with transmission of energy or reliability to the consumer. With the addition of these transmission lines, PJM can give up reliance on Brandon Shores Generating Station, with its very expensive energy, and use cheaper energy from PA. Maryland benefits because it can claim it uses cleaner energy - generated in PA from the gas produced by fracking and by our own energy generating gas-fired plants. The people of PA get nothing in return except their land taken by eminent domain, their property values and their neighbors' property values ruined, most likely a higher energy bill as their energy is shipped elsewhere, and ecologically, agriculturally, historically, and aesthetically valuable lands destroyed, so that PJM and Transource can make a lot of money. Doesn't seem fair, does it?

Respectfully submitted,



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