

C&H  
Curtin & Heefner LLP  
ATTORNEYS AT LAW

2005 S. EASTON ROAD • SUITE 100 • DOYLESTOWN, PA 18901

(267) 898.0570 • (800) 773.0680 • FAX (215) 340.3929

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JOANNA A. WALDRON  
JAW@curtinheefner.com

March 20, 2018

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

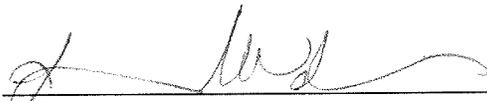
**Re: Application of Transource Pennsylvania, LLC Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval of the Siting and Construction of the 230kV Project in Portions of Franklin County, Pennsylvania  
Docket No. A-2017-2640200**

**Application of Transource Pennsylvania, LLC filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230kV Transmission Line Associated with the Independence Energy Connection-East Project in Portions of York County, Pennsylvania  
Docket No. A-2017-2640195**

Dear Secretary Chiavetta:

Enclosed please find the Petition to Add Appendix A Containing Member Standing Affidavits to the February 20, 2018, Petition to Intervene and Protest, pursuant to the Prehearing Conference.

CURTIN & HEEFNER LLP

BY:   
Jordan B. Yeager (Pa. I.D. No. 72947)  
Mark L. Freed (Pa. I.D. No. 63860)  
Joanna A. Waldron (Pa. I.D. No. 84768)  
jby@curtinheefner.com  
mlf@curtinheefner.com  
jaw@curtinheefner.com  
*Counsel for: Stop Transource Franklin County*

Enclosures

cc: Honorable Elizabeth H. Barnes  
Honorable Andrew M. Calvelli  
Certificate of Service

## CERTIFICATE OF SERVICE

**Consolidated Docket Nos. A-2017-2640200 and A-2017-2640195**

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 & FIRST CLASS MAIL

Honorable Elizabeth Barnes  
Honorable Andrew M. Calvelli  
Administrative Law Judges  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[ebarnes@pa.gov](mailto:ebarnes@pa.gov)  
[acalvelli@pa.gov](mailto:acalvelli@pa.gov)

Teresa K. Harrold, Esquire  
Tori L. Giesler, Esquire  
FirstEnergy Service Company  
2800 Pottsville Pike, PO Box 16001  
Reading, PA 19612-600  
*Mid-Atlantic Interstate Transmission  
& West Penn Power Company*  
[tharrold@firstenergycorp.com](mailto:tharrold@firstenergycorp.com)

Darryl A. Lawrence, Esq.  
Philip David Demanchick, Jr., Esq.  
David T. Evrard, Esquire  
Office of Consumer Advocate  
555 Walnut Street, Forum Place 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[dlawrence@paoca.org](mailto:dlawrence@paoca.org)  
[PDemanchick@paoca.org](mailto:PDemanchick@paoca.org)  
[devrard@paoca.org](mailto:devrard@paoca.org)

Kimberly A. Klock, Esquire  
Amy E. Hirakis, Esquire  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
*PPL Electric Utilities Corporation*  
[kklock@pplweb.com](mailto:kklock@pplweb.com)  
[aehirakis@pplweb.com](mailto:aehirakis@pplweb.com)

Romulo L. Diaz, Jr., Esquire  
Jack R. Garfinkle, Esquire  
Jennedy S. Johnson, Esquire  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19103  
*PECO*  
[Romulo.diaz@exeloncorp.com](mailto:Romulo.diaz@exeloncorp.com)  
[jack.garfinkle@exeloncorp.com](mailto:jack.garfinkle@exeloncorp.com)  
[jennedy.johnson@exeloncorp.com](mailto:jennedy.johnson@exeloncorp.com)

Margaret A. Morris, Esquire  
Linell Lukesh, Esquire  
Reger Rizzo Darnall LLP  
Circa Centre, 13<sup>th</sup> Floor  
2929 Arch Street  
Philadelphia, PA 19104  
*Citizens to STOP Transource*  
[mmorris@regerlaw.com](mailto:mmorris@regerlaw.com)  
[llukesh@regerlaw.com](mailto:llukesh@regerlaw.com)

Sharon E. Webb, Esquire  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)

Thomas J. Sniscak, Esquire  
Whitney F. Snyder, Esquire  
100 North Tenth Street  
Harrisburg, PA 17101  
*York County Planning Commission*  
[TJSniscak@hmslegal.com](mailto:TJSniscak@hmslegal.com)

Anthony D. Kanagy, Esq.  
Lindsay A. Berkstresser, Esq.  
David MacGregor, Esq.  
Post & Schell PC  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
*Transource Pennsylvania LLC*  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
[LBerkstresser@PostSchell.com](mailto:LBerkstresser@PostSchell.com)  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)

Linus E. Fenicle, Esquire  
Reager & Adler PC  
2331 Market St.  
Camp Hill, PA 17011  
*Quincy Township*  
[Lfenicle@reageradlerpc.com](mailto:Lfenicle@reageradlerpc.com)

Amanda Riggs Conner, Esquire  
Hector garcia esquire  
American electric power service corp  
1 Riverside Plaza  
29th Floor  
Columbus, OH 43215  
*Transource PA, LLC*  
[arconner@aep.com](mailto:arconner@aep.com)  
[hgarcial@aep.com](mailto:hgarcial@aep.com)

Curtin & Heefner LLP

By:   
JOANNA A. WALDRON

Date: March 20, 2018

**COMMONWEALTH OF PENNSYLVANIA  
BEFORE THE PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :  
Filed Pursuant to 52 Pa. Code Chapter 57, : Docket No. A-2017-2640195  
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 :

Application of Transource Pennsylvania, LLC :  
Filed Pursuant to 52 Pa. Code Chapter 57, : Docket No. A-2017-2640200  
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Connection-West Project in Portions of :  
Franklin County, Pennsylvania :

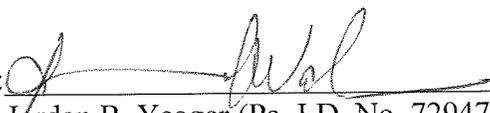
**PETITION OF STOP TRANSOURCE FRANKLIN COUNTY TO ADD APPENDIX A  
CONTAINING MEMBER STANDING AFFIDAVITS TO THE FEBRUARY 20, 2018  
PETITION TO INTERVENE AND PROTEST OF STOP TRANSOURCE FRANKLIN  
COUNTY**

Stop Transource Franklin County (“STFC”) hereby petitions to add the enclosed Appendix A to its Petition to Intervene and Protest, and avers as follows:

1. At the March 13, 2018 Prehearing Conference, which included conference on pending petitions to intervene, counsel for STFC offered to provide declarations from members of STFC with respect to standing and in support of the STFC’s Petition to Intervene and Protest.
2. Appendix A contains Member Standing Affidavits of five (5) STFC members: Lori Rice, Allan Etter, Karen Benedict, Lois White, and Ruth Frech.
3. Appendix A is offered in support of STFC’s Petition to Intervene and Protest.

WHEREFORE, Stop Transource Franklin County respectfully requests that the Commission accept this Appendix A to be added to and in support of Stop Transource Franklin County's Petition to Intervene and Protest that was filed on February 20, 2018.

Respectfully submitted,  
CURTIN & HEEFNER LLP

By:   
Jordan B. Yeager (Pa. I.D. No. 72947)  
Mark L. Freed (Pa. I.D. No. 63860)  
Joanna A. Waldron (Pa. I.D. No. 84768)  
2005 South Easton Road, Suite 100  
Doylestown, PA 18901

Dated: March 20, 2018

# APPENDIX A

**COMMONWEALTH OF PENNSYLVANIA  
BEFORE THE PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :  
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Connection-West Project in Portions of :  
Franklin County, Pennsylvania :

**AFFIDAVIT OF LORI RICE**

I, Lori Rice, verify that the following statements are true and correct to the best of my knowledge, information, and belief:

1. I reside at 1430 Henry Lane, Chambersburg, Franklin County, Pennsylvania 17202.
2. I, along with my husband, Allen Rice, own County Parcel 10-0D08-057-000000.
3. I am the President of Stop Transource Franklin County and an active member.
4. I have coordinated and attended multiple meetings over the past year as part of Stop Transource Franklin County.
5. Our farm is in the right-of-way proposed by Transource in the above-referenced Applications for construction of the two 230kV electric transmission lines as part of the Independence Energy Project ("IEC Project").
6. Transource is seeking a right-of-way agreement with us to place transmission line towers and right-of-way on my land.

7. We will be directly impacted by the IEC Project.
8. Our farming practice, which includes organic and biosecure practices, are not compatible with the proposed 130-foot wide right-of-way, towers, 230kV transmission lines, and the proposed vegetation management for the right-of-way.
9. The presence of the IEC Project's high voltage power lines will impact humans and animals on our farm.
10. The proposed IEC Project will restrict our ability to farm our land because any towers and the right-of-way will occupy useable land on our property, which is already limited by existing sinkholes and a utility line.
11. The constraints on our land will negatively impact our businesses and our finances.
12. I am concerned that the IEC Project would decrease the value of my land.
13. Further, the IEC Project would cause irreversible damage to the agriculture, tourism and future economic development in Franklin County.
14. I am working with Stop Transource Franklin County to show that the IEC Project is not necessary and fails to consider alternative energy sources, such as solar and wind.

The foregoing is true and correct to the best of my knowledge, information and belief. I understand that any false statements made are subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Executed this 19<sup>th</sup> day of March, 2018.



\_\_\_\_\_  
Lori C. Rice

**COMMONWEALTH OF PENNSYLVANIA  
BEFORE THE PUBLIC UTILITY COMMISSION**

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Associated with the Independence Energy :  
Connection-West Project in Portions of :  
Franklin County, Pennsylvania :

**AFFIDAVIT OF ALLAN ETTER**

I, Allan Etter, verify that the following statements are true and correct to the best of my knowledge, information, and belief:

1. My mother, Mary Etter, owns the farm at 5167 Olde Scotland Road, Franklin County, Pennsylvania 17257, County Parcel Nos. 09-0C-09-015-000000, and 09-0C09-014-000000.
2. I have power-of-attorney for my mother.
3. I am an active member of Stop Transource Franklin County.
4. Our family has farmed this land in Franklin County for six generations.
5. The land is in the right-of-way proposed by Transource in the above-referenced Applications for construction of the Independence Energy Project ("IEC Project") and Transource is seeking a right-of-way agreement with me.
6. Further, the proposed Rice Substation discussed in the Application will be in close proximity to our farm.

7. The placement of 135-foot tall towers and 230kV electric transmission lines will have an direct, immediate and substantial impact on our ability to farm our land.

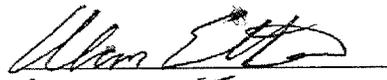
8. The towers and 130-foot wide right-of-way would directly impact our farming, and cause losses due to the inefficiency of farming around large tower structures.

9. The IEC Project will affect the geology of the property, and I am concerned that the IEC Project could have multiple impacts, such as reducing our water supply, creating sinkholes, or otherwise affecting land stability.

10. The addition of a nearby substation, transmission lines towers and EHV transmissions lines on and over our farm would decrease the value of my property.

The foregoing is true and correct to the best of my knowledge, information and belief. I understand that any false statements made are subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Executed this 20 day of March, 2018.

  
ALAN ETTER  
Allan Etter

**COMMONWEALTH OF PENNSYLVANIA  
BEFORE THE PUBLIC UTILITY COMMISSION**

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Franklin County, Pennsylvania :

**AFFIDAVIT OF KAREN BENEDICT**

I, Karen I. Benedict, verify that the following statements are true and correct to the best of my knowledge, information, and belief:

1. I reside at 5413 Manheim Road, Waynesboro, Franklin County, Pennsylvania 17202.

2. I, along with my husband Rodney A. Meyer, own County Parcel 09-0L07-038-000000, over eight acres in Quincy Township.

3. I am an active member of Stop Transource Franklin County and serve on the leadership team for the group.

4. Our land is in the right-of-way proposed by Transource in the above-referenced Applications for construction of the Independence Energy Project (“IEC Project”), and Transource is seeking a right-of-way agreement with me.

5. Transource proposes to place 135-foot tall transmission line towers and 230kV electric transmission lines and the right-of-way on my land.

6. The IEC Project would directly impact our home and use of our pasture for horses.

7. The proposed IEC Project is a substantial threat to continuing to use of land seasonally to pasture horses because the proposed electric transmission lines will pass directly over the pasture, and have known effects on horses.

8. Further, the IEC Project threatens our water supply because our home relies on a historic natural spring from adjacent land.

9. The proposed construction of the towers, and associated excavation and drilling activities, can impact shallow water sources, such as the spring, and alter our ability to use the natural spring.

10. The proposed transmission line would be within 450 feet of our home, and the right-of-way would be within 380 feet of our home.

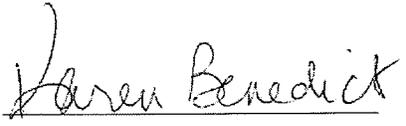
11. The IEC Project’s towers and EHV transmissions lines would decrease the value of my property.

12. The proposed IEC Project would impact the archaeological and historic value of the area.

13. Both Civil War and Native American Indian artifacts have been found on adjacent lands over the years, and recently, and we are concerned that the IEC Project installation will destroy additional historic artifacts.

The foregoing is true and correct to the best of my knowledge, information and belief. I understand that any false statements made are subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Executed this \_\_\_\_ day of March, 2018.

  
Karen Benedict

**COMMONWEALTH OF PENNSYLVANIA  
BEFORE THE PUBLIC UTILITY COMMISSION**

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Franklin County, Pennsylvania :

**AFFIDAVIT OF LOIS M. WHITE**

I, Lois M. White, verify that the following statements are true and correct to the best of my knowledge, information, and belief:

1. I reside at 1406 Walker Road, Chambersburg, Franklin County, Pennsylvania 17202, and am the owner of County Parcels 09-0C18-006A-000000 and 09-0C18-005-000000.
2. I am an active member of Stop Transource Franklin County.
3. My land is in the right-of-way proposed by Transource in the above-referenced Applications for construction of the Independence Energy Project ("IEC Project").
4. Transource proposes to place transmission line towers and 230kV transmission lines in that right-of-way on my land.
5. The construction and operation of these electric transmission lines and towers and associated 130-foot wide right-of-way would directly impact my farm and land.
6. The proposed IEC Project is a substantial threat to my

farm and to my quality of life because it will impact my ability to farm, the productivity of my farmland and soil, the value of my land, and the scenic value of my home.

7. The proposed IEC Project right-of-way divides my farm in two pieces.

8. Dividing the land and installing and maintaining a right-of-way will make it impossible to continue to use the property for corn production in same manner as it has been used, because farming around towers will be risky with large equipment.

9. In addition, the excavation required to construct and install the proposed towers will damage the productive soil, which last year produced corn crops at a rate of 230 bushels per acre.

10. Further, Transource proposes to maintain the 130-foot right-of-way through certain vegetation management practices, which will impact crop production

11. The transmission lines towers and EHV transmissions lines would decrease the value of my farm, which is my retirement savings.

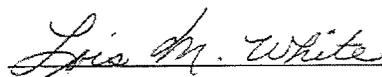
12. In addition to directly affecting the use and productivity of my land, the proposed Project will impact the views from my house on the property.

13. The proposed right-of-way passes behind my newly-constructed house that I had built on the most scenic portion of my property to capture the peaceful and tranquil views.

14. The IEC Project would destroy the peaceful and tranquil views from the home.

The foregoing is true and correct to the best of my knowledge, information and belief. I understand that any false statements made are subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Executed this 20 day of March, 2018.



Lois M. White

**COMMONWEALTH OF PENNSYLVANIA  
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Franklin County, Pennsylvania :

**AFFIDAVIT OF RUTH FRECH**

I, Ruth Frech, verify that the following statements are true and correct to the best of my knowledge, information, and belief:

1. I reside at 5617 Manheim Road, Waynesboro, Franklin County, Pennsylvania 17268.

2. I, along with my husband, Jay C. Frech, own County Parcel No. 19-0L07-046-000000.

3. I am an active member of Stop Transource Franklin County.

4. Our land is in the right-of-way proposed by Transource in the above-referenced Applications for construction of the Independence Energy Project ("IEC Project").

5. Transource is seeking a right-of-way agreement with me.

6. Transource proposes to place two 230kV transmissions

line and right-of-way on my land and to construct 135-foot tall towers near my property, all of which would directly impact our home.

7. My husband and I have planted trees and plants to create a wildlife habitat in our yard.

8. The proposed transmission lines would be within 250 feet of our home and will eliminate our ability to enjoy our yard and the wildlife habitat that we have established.

9. We raise chickens on our property for personal use, and I am concerned that the proposed IEC Project would impact the chicken's egg production.

10. I am concerned that the transmission line towers and 230kV transmissions lines would decrease the value of my property.

The foregoing is true and correct to the best of my knowledge, information and belief. I understand that any false statements made are subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Executed this 20 day of March, 2018.



~~Lois M. White~~

Ruth Frech *RF*