



Todd S. Stewart
Office: 717 236-1300 x242
Direct: 717 703-0806
tsstewart@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

September 12, 2014

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

RE: Application Of PPL Electric Utilities Corporation Under 15 Pa.C.S. §1511(c) For A Finding And Determination That The Service To Be Furnished By The Applicant Through Its Proposed Exercised Of The Power Of Eminent Domain To Acquire Right-of-Way and Easement Over A Certain Portion Of The Lands of J.Roy's, Inc., c/o Mr. Grant Wise, in Brecknock Township, Lancaster County, Pennsylvania for Siting And Construction Of Transmission Lines Associated With The Proposed North Lancaster-Honey Brook Project is Necessary Or Proper For The Service, Accommodation, Convenience Or Safety of the Public; Docket No. A-2014-2430579; **Prehearing Conference Memorandum of J.Roy's Inc.**

Dear Secretary Chiavetta:

Enclosed for electronic filing with the Commission is the Prehearing Conference Memorandum of J.Roy's Inc. in the above-captioned matter. Copies have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Sincerely,

Todd S. Stewart
Counsel to J.Roy's Inc.

TSS/jld
Enclosure
cc: Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

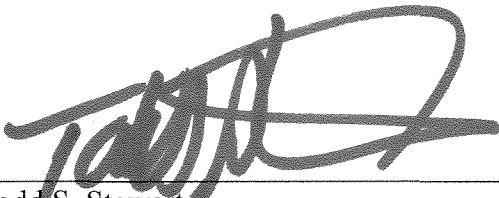
VIA ELECTRONIC & FIRST CLASS MAIL

David B. MacGregor
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
dmacgregor@postschell.com

Paul E. Russell
Associate General Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
perussell@pplweb.com

Christopher T. Wright
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
cwright@postschell.com

DATED: September 12, 2014



Todd S. Stewart

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application Of PPL Electric Utilities :
Corporation Under 15 Pa.C.S. §1511(c) For A :
Finding And Determination That The Service :
To Be Furnished By The Applicant Through : Docket No. A-2014-2430579
Its Proposed Exercised Of The Power Of :
Eminent Domain To Acquire Right-of-Way :
and Easement Over A Certain Portion Of The :
Lands of J.Roy’s, Inc., c/o Mr. Grant Wise, in :
Brecknock Township, Lancaster County, :
Pennsylvania for Siting And Construction Of :
Transmission Lines Associated With The :
Proposed North Lancaster-Honey Brook :
Project is Necessary Or Proper For The :
Service, Accommodation, Convenience Or :
Safety of the Public :

Application of PPL Electric Utilities Corporation :
For Approval of the Siting and Construction :
of the North Lancaster-Honey Brook #1 : Docket No. A-2014-2340565
& #2 138/69KV Transmission Lines :
in Lancaster County Pennsylvania :

**PREHEARING CONFERENCE MEMORANDUM
OF
J. ROY’S INC.**

**TO ADMINISTRATIVE LAW
JUDGE SUSAN D. COLWELL:**

NOW COMES J.Roy’s Inc. (“J.Roy’s”) and hereby submits this Prehearing Conference Memorandum.

1. J.Roy's agrees to accept electronic service of documents in this proceeding and requests that all documents in this proceeding be served on the following counsel:

Todd S. Stewart (Pa. ID No. 75556)
tsstewart@hmslegal.com
Hawke McKeon & Sniscak LLP
100 North Tenth Street
PO Box 1778
Harrisburg, PA 17105
(717) 236-1300 (voice)
(717) 236-4841 (fax)

To the extent that parties are able to include additional persons on the electronic service list, J.Roy's requests that the following persons also be included: Christopher M. Arfaa emarfaa@hmslegal.com and Christopher J. Knight cjknight@hmslegal.com.

2. J.Roy's intends to present, at a minimum, the issues identified in its Protest, which include the failure of PPL's application to meet its burden of proving that the proposed line is reasonable or necessary for the public safety and or convenience. In this particular instance, the concern over safety is pre-eminent, because of the proximity of a sizeable explosives storage facility on the premises owned by J.Roy's and over which PPL has proposed to construct the line in question. J.Roy's may also address the lack of need for the line as well.

3. J.Roy's intends, for the moment, to call its Principle, Mr. Grant H. Wise. It may also call additional witnesses as circumstances warrant, and it reserves the right to do so.

4. J.Roy's has not yet engaged in discovery but will do so, to the extent necessary, in an expedient manner. J.Roy's does not anticipate that any modification to the Commission's discovery regulations will be required, but is not opposed to same.

5. J.Roy's has reviewed the litigation schedule proposed by PPL and finds it to be acceptable.

6. J.Roy's is amenable to settlement negotiations at any time.

WHEREFORE, J.Roy's Inc. respectfully submits this Prehearing Conference Memorandum for your Honor's consideration at the prehearing conference scheduled for September 18, 2014 at 10 am.

Respectfully submitted,

By: 

Todd S. Stewart (Pa. ID No. 75556)
Christopher M. Arfaa (Pa. ID No. 57047)
Christopher J. Knight (Pa. ID No. 80058)
Hawke McKeon & Sniscak LLP
100 North Tenth Street
PO Box 1778
Harrisburg, PA 17105
Office: (717) 236-1300
Facsimile: (717) 236-4841
tsstewart@hmslegal.com
cmarfaa@hmslegal.com
cjknight@hmslegal.com

Counsel for J.Roy's Inc.