

# Mey & Sulla, L.L.P.

Attorneys - at - Law  
1144 East Drinker Street  
Dunmore, PA 18512  
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[jsulla@meysullalaw.com](mailto:jsulla@meysullalaw.com)  
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A-2016-2571918

Please reply to Dunmore

RECEIVED  
2016 NOV 30 AM 10:22  
PA.P.U.C.  
SECRETARY'S BUREAU

Michael R. Mey  
Justin J. Sulla

1425 Wyoming Avenue  
Forty Fort, PA 18704

November 23, 2016

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

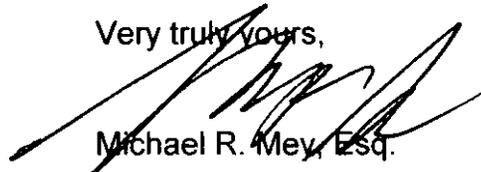
**RE: Application of PPL Electric Utilities Corporation Under 15 Pa.C.S. §1511(c) For A Finding And Determination That The Service To Be Furnished By the Applicant Through Its Proposed Exercise Of The Power Of Eminent Domain To Acquire Right-Of-Way And Easement Over A Certain Portion Of the Lands Of Dalton Equity, Inc., In West Abington, Lackawanna County, Pennsylvania Is Necessary Or Proper For the Service Accommodation, Convenience, Or Safety Of the Public - Docket No.: 2016-2571923; and,**

**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 Exercise Of The Power Of Eminent Domain To Acquire Right-Of-Way And Easement Over A Certain Portion Of the Lands Of the Heirs of Davis Dean Inc., In West Abington, Lackawanna County, Pennsylvania Is Necessary Or Proper For the Service Accommodation, Convenience, Or Safety Of the Public - Docket No.: 2016-2571918**

Dear Ms. Chiavetta:

Enclosed please find my Entry of Appearance and Petition to Intervene on behalf of Dalton Equity, Inc., and the Heirs of Davis Dean.

Very truly yours,



Michael R. Mey, Esq.

MRM/jmn  
Enc.

cc: Elizabeth H. Barnes, Administrative Law Judge  
Christopher T. Wright, Esq.

Michael R. Mey, Esq.  
Mey & Sulla, LLP  
ID #41441  
1144 East Drinker Street  
Dunmore, PA 18512  
(570) 961-1929

**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 Its Proposed :  
Exercise Of The Power Of Eminent :  
Domain To Acquire Right-of-Way :  
And Easement Over A Certain :  
Portion Of The Lands of the **Heirs of** :  
**Davis Dean**, In West Abington, :  
Lackawanna County, Pennsylvania is :  
Necessary or Proper for the Service, :  
Accommodation, Convenience, or :  
Safety of the Public :

Docket No.: A-2016- 2571918

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

.....  
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 :  
Exercise Of The Power Of Eminent :  
Domain To Acquire Right-of-Way :  
And Easement Over A Certain :  
Portion Of The Lands of **Dalton Equity,** :  
**Inc.**, In West Abington, Lackawanna :  
County, Pennsylvania is Necessary or :  
Proper for the Service, Accommodation, :  
Convenience, or Safety of the Public :

Docket No.: A-2016- 2571923

**PETITION TO INTERVENE**

**NOW COMES** the Intervener, Dalton Equity, Inc., in its own right, and as successor in interest to the Heirs of Davis Dean, by and through their counsel, Mey & Sulla, LLP and by these presents doES hereby petition to intervene in the above Applications filed by PP&L:

## **BACKGROUND**

1. Dalton Equity, Inc. is the fee simple owner of a property located in Lackawanna County whose meets and bounds description is attached and Exhibit "1".

2. Dalton Equity, Inc. has had a survey performed of its property which is attached as Exhibit "2".

3. When first contacted by PPL regarding the potential selection of its property for a proposed high-voltage power line PPL's representative provided Intervener with a description purporting to show that a portion of Dalton's land was allegedly owned by the Heirs of Dean Davis.

4. Dalton Equity, Inc. believes that this was a transposition error by PPL's representative, however, out of an abundance of caution Dalton has caused to be filed a Corrective Deed (Exhibit "3") to ensure that its legal description matches the survey attached as Exhibit "2".

## **PURPOSE OF INTERVENTION**

5. Dalton Equity has a direct, immediate and substantial interest in the subject matter of the Petitions filed by PPL and Dalton Equity's interests are not and will not be adequately represented in these proceedings absent intervention and opportunity to participate and protect its interests.

6. Dalton Equity does not want a power line installed on its property.

7. Dalton Equity's property is currently undeveloped, however, since soon after its purchase Dalton's intention was always to develop the property for residential use and has performed extensive survey and land planning in pursuit of its plan.

8. PPL has alleged that the sole user for this more than four miles long, hundred foot wide proposed right-of-way is William's Partners, the operator of a number of natural gas pipelines and is, upon information and belief a publicly traded for profit business entity.

9. PPL proposal to take Dalton's land cannot, therefore, be proper for the service, accommodation, convenience, or safety of the public. Specifically, PPL's invocation of the jurisdiction of the Pennsylvania Public Utility Commission is improper since its proposed power line would service only a single private party.

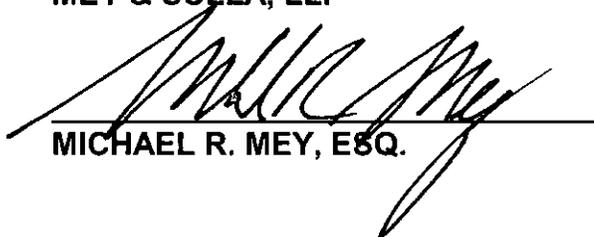
10. Intervener, Dalton, does therefore intend to formally object and protest to PPL's request for a determination by the Pennsylvania Public Utility Commission for a finding that the service to be furnished by it would be proper for the service, accommodation, convenience or safety of the public.

11. It is Dalton's intention to fully participate in all proceedings before the Pennsylvania Public Utility Commission to contest the proposed evidence by PPL and by these presence to hereby object to the hearsay documentation filed in PPL's application and further requests that all such documentation be rejected and stricken from the record before the Pennsylvania Public Utility Commission especially any purported "direct testimony" since the same was "taken" without notice or opportunity to participate by Dalton.

12. PPL's application does not demonstrate that both PPL and its proposed "customer" had adequately addressed alternatives to the installation and siting of the proposed power line.

**RESPECTFULLY SUBMITTED:**

**MEY & SULLA, LLP**



A handwritten signature in black ink, appearing to read "Michael R. Mey", is written over a horizontal line.

**MICHAEL R. MEY, ESQ.**

**RECEIVED**  
**2016 NOV 30 AM 10:23**  
**PA.P.U.C.**  
**SECRETARY'S BUREAU**

1

**METES & BOUNDS DESCRIPTION - Dalton Equity, Inc.**

All that certain parcel of land lying and situate in the township of West Abington, County of Lackawanna, and Commonwealth of Pennsylvania, more specifically described as follows:

Beginning at the center of the intersection of Seminary Road (S.R. # 4020 and Pond Road (T-436) common to lands of St. Michael's Agr. Ind. School and Dalton Equity, Inc;

Thence along the center of Pond Road for the following three courses and distances: South 48°03'02" East for a distance of 390.78 feet to a corner, thence in a South 46°50'06" East direction for a distance of 106.23 feet to a corner, thence in a South 39°39'47" East direction for a distance of 42.26 feet to a corner;

Thence along lands of Betty J. Deleo following a stone wall and barbwire fence in a South 39°09'07" West direction for a distance of 1701.89 feet to a corner;

Thence along the northeasterly side of West Abington Road (S.R. # 4018) in a North 64°51'12" West direction for a distance of 228.41 feet to a corner;

Thence along lands of Robert Syzmanski following a barbwire fence for the following three courses and distances: North 13°57'15" East for a distance of 1243.99 feet to a corner, thence in a North 62°17'15" East direction for a distance of 341.00 feet to a tree corner, thence in a North 20°32'15" East direction for a distance of 119.00 feet to a corner;

Thence following the center of Seminary Road (S.R. #4020) for the following four (4) courses and distances: South 72°35'50" West direction for a distance of 50.64 feet to a corner, thence in a South 75°23'56" West direction for a distance of 66.87 feet to a corner, thence in a South 79°37'52" West direction for a distance of 87.87 feet to a corner, thence in a South 84°21'38" West direction for a distance of 198.36 feet to a corner;

Thence along lands of Robert Syzmanski in a North 09°12'45" West direction for a distance of 2061.87 feet to a corner;

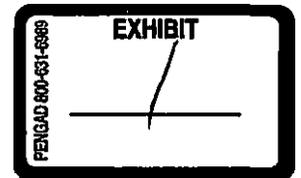
Thence along lands of Donald A. Williams in a North 15°14'59" East direction for a distance of 1603.97 feet to a corner;

Thence along lands of William J. Jordan, Jr. then Clinton F. Sekol, Jr. following a stone wall and barbwire fence in a South 47°19'31" East direction for a distance of 1544.67 feet to a corner;

RECORDED

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



Thence along lands of St. Michael's Agr. Ind. School following a barbwire fence for the following three courses and distances: South 33°24'39" West for a distance of 729.58 feet to a corner, thence in a South 27°01'26" West direction for a distance of 1089.00 feet to a corner, thence in a South 46°28'34" East direction for a distance of 769.82 feet to a corner;

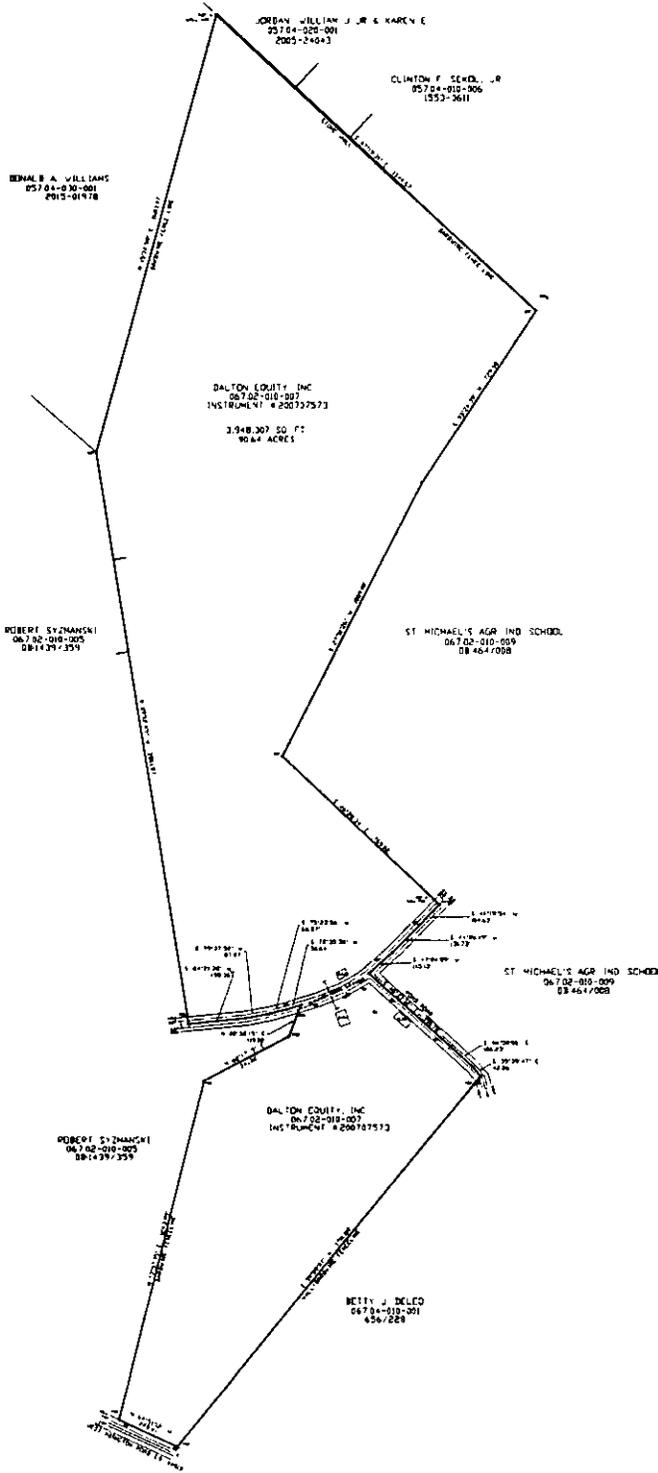
Thence following the center of Seminary Road for the following three courses and distances : South 44°19'54" West for a distance of 104.63 feet to a corner, thence in a South 44°26'19" West direction for a distance of 131.73 feet to a corner, thence in a South 47°04'09" West direction for a distance of 115.13 feet to the point of beginning.

Said parcel being subject to the right-of-way of Seminary Road and Pond Road, all easements, restrictions, rights-of-way, covenants, reservations or conditions contained in the chain of title or granted herein, contains approximately 90.6 acres.

2

# DALTON EQUITY, INC.

WEST ABINGTON TOWNSHIP LACKAWANNA COUNTY PENNSYLVANIA  
AS SURVEYED FOR WATKINS ON 02/09/16 - (NOT RESURVEYED ON 07/18/16)

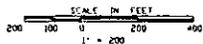


## RECEIVED

NOV 30 2016

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

PLAN



I, GUY ANTHONY DEANGELO, REGISTERED PROFESSIONAL LAND SURVEYOR  
SAY, U.S.S.H.C., HEREBY CERTIFY THAT THE PLAT OF LAND SHOWN HEREON  
REPRESENTS A SURVEY MADE BY ME AND THAT ALL MONUMENTS  
INDICATED HEREON ACTUALLY EXIST AS TO THEIR LOCATION, SIZE AND  
MATERIAL.

ALL PLANS THAT DO NOT SHOW AN EMBOSSED SEAL OVER AN ORIGINAL  
SIGNATURE IN BLACK INK, MAY HAVE BEEN FALSIFACTUALLY ALTERED.  
ALL INFORMATION SHOULD BE DISREGARDED UNLESS VERIFIED BY THE  
PROFESSIONAL LAND SURVEYOR WHOSE SIGNATURE APPEARS AT RIGHT



SURVEY MAP	
REVISED	07/18/16
DESIGNED	SWAN
DRAWN	J.A.C.
C.L.R.	17-2007
DATE	07/18/16
GUY ANTHONY DEANGELO, P.L.S.	
1619 BAVINCI LANE CLARKS SUMMIT, PENNSYLVANIA 18411 TEL (570) 838-1111	

EXHIBIT  
2  
PENGAD 800-631-6808



EVIE RAFALKO MCNULTY  
 Lackawanna County Recorder of Deeds  
 Gateway Center  
 135 Jefferson Avenue  
 Scranton, Pennsylvania 18503

3

This is a certification page  
 \*\*\*This page is now part of this legal document - DO NOT DETACH\*\*\*



INSTRUMENT #: 201612429

Receipt#: 266146  
 Clerk: AMT  
 Rec Date: 08/09/2016 01:49:10 PM  
 Doc Grp: D  
 Descrip: DEED - CORRECTIVE  
 Num Pgs: 6  
 Rec'd Frm: SULLA JUSTIN

Party1: DALTON EQUITY INC  
 Party2: DALTON EQUITY INC  
 Town: WEST ABINGTON TOWNSHIP

Consideration: 1.00  
 Taxable Amount: 0.00  
 Assessed Value: 11928.00

Recording:

Recording Fees - ROD	15.00
Cover/Index Page	2.00
Parcel Certification	10.00
State Writ Tax	0.50
State JCS/Access to Justi	35.50
Affordable Housing	13.00
County Improvement Fee	2.00
ROD Improvement Fee	3.00

Sub Total: 81.00

Transfer Tax	
STATE TRANSFER TAX	0.00
WEST ABINGTON TOWNSHIP	0.00
LACKAWANNA TRAIL SCHOOL D	0.00

Sub Total: 0.00

Total: 81.00

\*\*\*\* NOTICE: THIS IS NOT A BILL \*\*\*\*

I hereby CERTIFY that this document is recorded in the Recorder of Deeds Office of Lackawanna County, Pennsylvania.



*Evelyn Rafalko McNulty*

Evelyn Rafalko McNulty  
 Recorder of Deeds

\*\* Information may change during the verification process and may not be reflected on this page

Record and Return To:

SULLA JUSTIN  
 1144 E DRINKER ST  
 DUNMORE PA 18512  
 BOX 28

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NOV 30 2016

PA PUBLIC UTILITY COMMISSION  
 SECRETARY'S BUREAU



PIN NO. 067.02-010-007

***CONFIRMATORY/CORRECTIVE DEED,***

MADE the 9<sup>th</sup> day of August in the year of our Lord Two Thousand Sixteen (2016).

**BETWEEN Dalton Equity, Inc.,** a Pennsylvania Corporation, Dunmore, Lackawanna County, Pennsylvania hereinafter referred to as the "**GRANTOR,**"

A  
N  
D

**Dalton Equity, Inc.,** a Pennsylvania Corporation, Dunmore, Lackawanna County, Pennsylvania, hereinafter referred to as the "**GRANTEE,**"

**WITNESSETH,** that in consideration of **One (\$1.00) Dollar,** in hand paid, the receipt whereof is hereby acknowledged; the Grantor does hereby grant and convey to the said Grantee, its successors and assigns,

**ALL** that certain parcel of land lying and situate in the township of West Abington, County of Lackawanna, and Commonwealth of Pennsylvania, more specifically described as follows:

Beginning at the center of the intersection of Seminary Road (S.R. # 4020 and Pond Road (T-436) common to lands of St. Michael's Agr. Ind. School and Dalton Equity, Inc;

Thence along the center of Pond Road for the following three courses and distances: South 48°03'02" East for a distance of 390.78 feet to a corner, thence in a South 46°50'06" East direction for a distance of 106.23 feet to a corner, thence in a South 39°39'47" East direction for a distance of 42.26 feet to a corner;

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Said parcel being subject to the right-of-way of Seminary Road and Pond Road, all easements, restrictions, rights-of-way, covenants, reservations or conditions contained in the chain of title or granted herein, contains approximately 90.6 acres.

**BEING** the same premises conveyed to Dalton Equity, Inc. by Deed dated March 23, 2007, recorded in the Lackawanna County Recorder of Deeds Office on March 26, 2007 to Instrument No. 2007-07573.

This Deed is to correct and/or confirm the metes and bounds description from the description contained in the Deed dated March 23, 2007, recorded on March 26, 2007 to Instrument No. 2007-07573.

**SUBJECT** to the same adverses, restrictions, limitations, reservations, conditions, exceptions, covenants and easements as are contained in the prior Deeds and other documents composing the chain of title to the above described premises or as may be visible by physical inspection of the realty, but nevertheless, the mere recitation of this clause shall not serve to revive or perpetuate such restrictions, limitations, reservations, conditions, exceptions, covenants and easements if they have already expired in law or in practical effect.

**TOGETHER WITH** all and singular the buildings and improvements, ways, streets, alleys, driveways, passages, waters, water-courses, rights, liberties, privileges, hereditaments and appurtenances, whatsoever unto the hereby granted premises belonging, or in anywise appertaining, and the reversions and remainders, rents, issues, and profits thereof; and all the estate, right, title, interest, property, claim and demand whatsoever of it, the said Grantor, as well at law as in equity, of, in and to the same.

**TO HAVE AND TO HOLD** the said lot or piece of ground described above, with the buildings and improvements thereon erected, hereditaments and premises hereby granted, or mentioned and intended so to be, with the appurtenances, unto the said Grantee, its successors and assigns, to and for the only proper use and behoof of the said Grantee, its successors and assigns, forever.

**AND** the said Grantor, for its successors and assigns, executors and administrators, does, by these presents, covenant, grant and agree, to and with the said Grantee, its successors and assigns, that it, the said Grantor, and its successors and assigns, all and singular the hereditaments and premises herein described and granted, or mentioned and intended so to be, with the appurtenances, unto the said Grantee, its successors and assigns, against it, the said Grantor, and its successors and assigns, will specially warrant and defend against the lawful claim of all persons claiming by, through or under the said Grantor but not otherwise.

IN WITNESS WHEREOF, the GRANTOR has hereunto, by its President, set his hand and seal the day and year first above written.

SIGNED, SEALED and DELIVERED in the presence of:

DALTON EQUITY, INC.

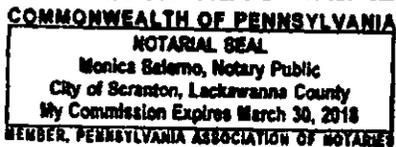
*[Signature]*  
MICHAEL R. MEY

*[Signature]*  
Witness

COMMONWEALTH OF PENNSYLVANIA :  
: SS  
COUNTY OF LACKAWANNA :

On this, the 9<sup>th</sup> day of August 2016, before me, the undersigned officer personally appeared Michael R. Mey, who acknowledged himself to be President of Dalton Equity, Inc. and acknowledged that he being authorized to do so, executed the foregoing instrument for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.



*[Signature]*  
Notary Public

I hereby certify that the correct address of the GRANTEE is:

1144 East Drinker Street, Dunmore, PA 18512

*[Signature]*  
Counsel for Grantee

LACKAWANNA COUNTY  
Certified Property Identification  
MUNI: 40

AUG 9 - 2016  
PIN: 06702 010 00700  
USE: 5000 ASSESS VAL 11928  
CLERK AM  
1000

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NOV 8 0 2016

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



# REALTY TRANSFER TAX STATEMENT OF VALUE

See reverse for instructions.

**RECORDER'S USE ONLY**

State Tax Paid	_____
Book Number	_____
Page Number	Inst # 201612429
Date Recorded	8-9-16

Complete each section and file in duplicate with Recorder of Deeds when (1) the full value/consideration is not set forth in the deed, (2) the deed is without consideration or by gift, or (3) a tax exemption is claimed. If more space is needed, please attach additional sheets. A Statement of Value (SOV) is not required if the transfer is wholly exempt from tax based on family relationship or public utility easement. However, it is recommended that a SOV accompany all documents filed for recording.

**A. CORRESPONDENT - All inquiries may be directed to the following person:**

Name Michael R. Mey, Esq.		Telephone Number: (570) 981-1929	
Mailing Address 1144 East Drinker Street		City Dunmore	State ZIP Code PA 18512

**B. TRANSFER DATA**

Date of Acceptance of Document 08 / 09 / 2016			
Grantor(s)/Lessor(s) Dalton Equity, Inc.		Grantee(s)/Lessee(s) Dalton Equity, Inc	
Mailing Address 1144 East Drinker Street		Mailing Address 1144 East Drinker Street	
City Dunmore	State PA	ZIP Code 18512	City State ZIP Code Dunmore PA 18512

**C. REAL ESTATE LOCATION**

Street Address Lake Winola Road		City, Township, Borough West Abington Township	
County Lackawanna	School District Abington	Tax Parcel Number 0670201000700	

**D. VALUATION DATA**

Was transaction part of an assignment or relocation?  Y  N

1. Actual Cash Consideration 1.00	2. Other Consideration + 0.00	3. Total Consideration = 1.00
4. County Assessed Value 11,928.00	5. Common Level Ratio Factor x 6.94	6. Computed Value = 82,780.32

**E. EXEMPTION DATA - Refer to instructions for exemption status.**

1a. Amount of Exemption Claimed \$ 82,780.32	1b. Percentage of Grantor's Interest in Real Estate 100.00 %	1c. Percentage of Grantor's Interest Conveyed 100.00 %
---	---	---

**2. Check Appropriate Box Below for Exemption Claimed.**

- Will or intestate succession. \_\_\_\_\_ (Name of Decedent) \_\_\_\_\_ (Estate File Number)
- Transfer to a trust. (Attach complete copy of trust agreement identifying all beneficiaries.)
- Transfer from a trust. Date of transfer into the trust \_\_\_\_\_  
If trust was amended attach a copy of original and amended trust.
- Transfer between principal and agent/straw party. (Attach complete copy of agency/straw party agreement.)
- Transfers to the commonwealth, the U.S. and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (If condemnation or in lieu of condemnation, attach copy of resolution.)
- Transfer from mortgagor to a holder of a mortgage in default. (Attach copy of mortgage and note/assignment.)
- Corrective or confirmatory deed. (Attach complete copy of the deed to be corrected or confirmed.)
- Statutory corporate consolidation, merger or division. (Attach copy of articles.)
- Other (Please explain exemption claimed.) \_\_\_\_\_

**Under penalties of law, I declare that I have examined this statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.**

Signature of Correspondent or Responsible Party 	Date 7-9-16
---	----------------

**FAILURE TO COMPLETE THIS FORM PROPERLY OR ATTACH REQUESTED DOCUMENTATION MAY RESULT IN THE RECORDER'S REFUSAL TO RECORD THE DEED.**

Michael R. Mey, Esq.  
Mey & Sulla, LLP  
ID #41441  
1144 East Drinker Street  
Dunmore, PA 18512  
(570) 961-1929

**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 Its Proposed : Docket No.: A-2016- 2571918  
Exercise Of The Power Of Eminent :  
Domain To Acquire Right-of-Way :  
And Easement Over A Certain :  
Portion Of The Lands of the **Heirs of** :  
**Davis Dean**, In West Abington, :  
Lackawanna County, Pennsylvania is :  
Necessary or Proper for the Service, :  
Accommodation, Convenience, or :  
Safety of the Public :

.....  
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Portion Of The Lands of **Dalton Equity,** :  
**Inc.**, In West Abington, Lackawanna :  
County, Pennsylvania is Necessary or :  
Proper for the Service, Accommodation, :  
Convenience, or Safety of the Public :

**CERTIFICATE OF SERVICE**

I, Michael R. Mey, Esq., counsel for Dalton Equity, Inc., in its own right and as successor in interest to he Heirs of Davis Dean, hereby certify that I have served the within Petition to Intervene on the parties listed below:

Elizabeth H. Barnes, Administrative Law Judge  
P.O. Box 3265  
Harrisburg, PA 17105-3265

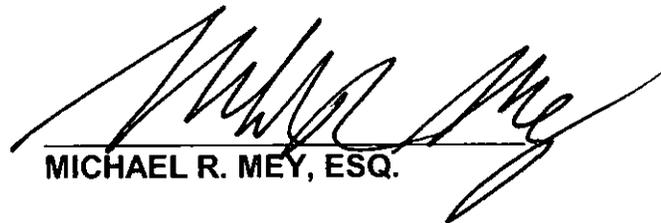
**RECEIVED**

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SECRETARY'S BUREAU

David B. MacGregor, Esq.  
Christopher T. Wright, Esq.  
Post & Schell  
17 N Second St., 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601

Kimberly A. Klock, Esq.  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101



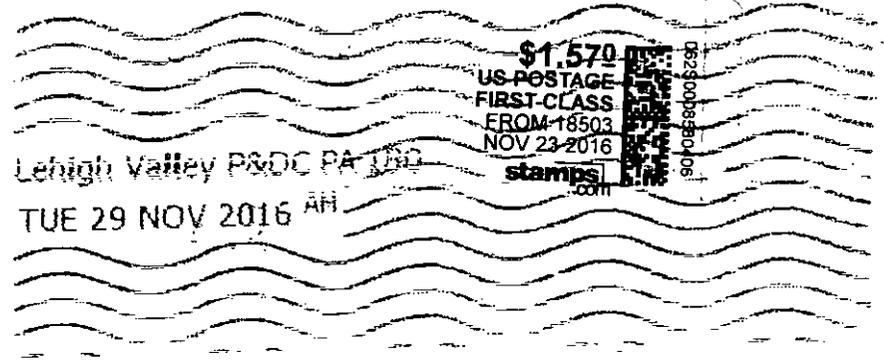
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