

Michael R. Mey, Esquire
Mey & Sulla, LLP
ID #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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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 :

COVER PAGE
DALTON EQUITY PREHEARING MEMEORANDUM
PROPOSED DISCOVERY ORDER
CERTIFICATE OF SERVICE

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PRE-HEARING CONFERENCE MEMORANDA

Now, comes Respondent, Dalton Equity, by and through their counsel, Mey & Sulla, LLP., and pursuant to the Order of the Honorable Elizabeth H. Barnes, Administrative Law Judge, makes the following initial pre-hearing conference memorandum:

A. Pursuant to 52 PA. Code §155 service should be made for both Dalton Equity and the Heirs of David Dean upon: Michael R. Mey, Esquire, 1144 East Drinker Street, Dunmore, PA 18512 (570)961-1929, mmey@meysullalaw.com.

B. A settlement offer has been made by PPL to which a response will be forthcoming.

C. Respondent would propose that written discovery in the form of Request for Production of Documents and Subpoenas be initiated on December 15, 2016; Depositions to be completed by May 15th, 2017.

D. Respondent's proposed Order for discovery is attached.

E. Respondent would propose that written testimony be provided on or before July 15, 2017 and that a hearing be scheduled thereafter. With post hearing briefs thirty (30) days after hearing.

F. Names, business addresses and telephone numbers of witnesses: to be determined following written discovery.

G. List of issues and sub- issues by Respondent:

1. Whether PPL's proposed use of Eminent Domain is for a public purpose;

2. Whether the installation of the 69 KV line is necessary;

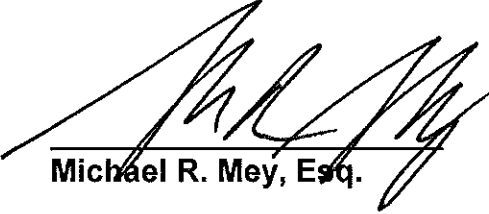
3. Whether PPL has exhausted other alternatives;

4. Whether service to the proposed Williams compressor station is necessary for the public safety, use and health.

H. Statement of proposed evidence by Respondent: to be determined after discovery.

I. Respondent agrees that the proceedings filed to the above captions should be consolidated since Dalton Equity is the only actual party in interest.

Respectfully submitted,



Michael R. Mey, Esq.

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PROPOSED DISCOVERY ORDER

- A. All written discovery to be initiated on December 15, 2016 and completed by March 1, 2017.
- B. All Depositions to be completed by May 15, 2017

Elizabeth H. Barnes, J.

Michael R. Mey, Esq.
Mey & Sulla, LLP
ID #41441
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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 Prehearing Memorandum and Proposed Discovery Order on the parties listed below:

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

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

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



MICHAEL R. MEY, ESQ.