

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 :  
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Convenience, or Safety of the Public :

COVER PAGE  
FOR APPLICATION FOR ISSUANCE OF A SUBPOENA

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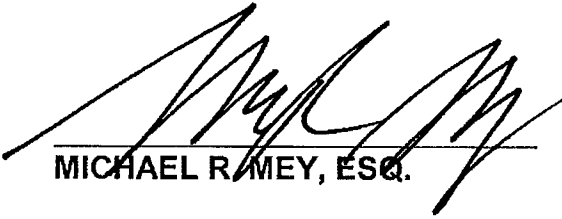
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**CERTIFICATE OF SERVICE**

I, Michael R. Mey, Esq., counsel for Dalton Equity, Inc., in its own right and as successor in interest to the Heirs of Davis Dean, hereby certify that I have served the within Application for Issuance of a Subpoena, Notice to Respond or Object and Subpoena Issued by the Pennsylvania Public Utility Commission on the parties listed below:

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

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



MICHAEL R. MEY, ESQ.

# Mey & Sulla, L.L.P.

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

Please reply to Dunmore

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Michael R. Mey  
Justin J. Sulla

1425 Wyoming Avenue  
Forty Fort, PA 18704

January 4, 2017

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

**RE: DALTON EQUITY**

Dear Judge Barnes:

Enclosed herewith please find an Application for the Issuance of a Subpoena by Dalton Equity.

Thank you for your kind attention to this matter. I am available to the Court at its convenience should you have any questions.

Respectfully yours,

  
Michael R. Mey, Esquire

MRM/jmn  
Enclosure  
cc: Christopher T. White, Esquire

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NOTICE TO RESPOND OR OBJECT

TO: PPL  
Transcontinental Gas Pipeline Company, LLC ("Transco")

Take notice that the attached Application shall be filed with Rosemary Chiavetta, Pennsylvania Public Utility Commission Secretary and the presiding Administrative Law Judge, Elizabeth H. Barnes, and that you are required to file any objection or response thereto within ten (10) days hereof.



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**APPLICATION FOR ISSUANCE OF A SUBPOENA**

**TO: THE HONORABLE ELIZABETH BARNES, ADMINISTRATIVE LAW JUDGE**

**NOW COMES** the Intervener, **Dalton Equity**, by and through its counsel, **Mey & Sulla, LLP**, and moves this Honorable Court to issue a Subpoena to **Transcontinental Gas Pipeline Company, LLC ("Transco")** and in support thereof says as follows:

1. This matter arises out of a request by PPL for a finding by the PUC that its purposed right-of-way over the lands of Dalton Equity is necessary or proper for the service, accommodation, convenience or safety of the public.

2. Dalton opposes the imposition of a right-of-way upon its land.

3. PPL's application sets forth that the service to be provided by this 59 kw line is exclusively for compressor station owned by Transco to supply electric power for a compressor station for one of Transco's natural gas pipelines.

4. Dalton contends that the purposed right-of-way and service to Transco is neither necessary nor proper for the service, accommodation, convenience or safety of the public nor has PPL and Transco adequately demonstrated an alternative to the 59kw power line.

5. Dalton proposes the service of a Subpoena substantially in the form of that attached as Exhibit 1 hereto seeking the following documents from Transco:

1. Correspondence between PPL and Transco and its affiliated companies, subsidiaries and partners concerning a proposed new natural gas compression station, Station 605 to be located in Clinton Township, Wyoming County.

2. All contracts, agreements, proposals, letters of intent or similar such documents between PPL and Transco and its affiliated companies, subsidiaries, partners, etc., concerning the proposed new natural gas compression station, Station 605 to be located in Clinton Township, Wyoming County.

6. The aforesaid documents are relevant, material and directly related to Dalton's opposition to PPL's proposed right-of-way.

7. Dalton believes that the documents sought will establish that the proposed right-of-way and ultimate electrical service to Transco will not be for the public's necessity, service, accommodation, convenience or safety and that there are alternatives available to Transco which are not addressed by PPL's application.

**WHEREFORE**, the Intervener, Dalton Equity, respectfully requests this Honorable Court to issue a Subpoena substantially in the form as that attached as Exhibit 1 hereto.

**RESPECTFULLY SUBMITTED,**

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

**MICHAEL R. MEY, ESQ.**

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**SUBPOENA ISSUED BY THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**TO: Transcontinental Gas Pipeline Company, LLC ("Transco")**

You are commanded to produce and permit inspection and copying of the following documents or objects at the place, date and time specified below:

1. Correspondence between PPL and Transco and its affiliated companies, subsidiaries and partners concerning a proposed new natural gas compression station, Station 605 to be located in Clinton Township, Wyoming County.

2. All contracts, agreements, proposals, letters of intent or similar such documents between PPL and Transco and its affiliated companies, subsidiaries, partners, etc., concerning the proposed new natural gas compression station, Station 605 to be located in Clinton Township, Wyoming County.

Place: 1144 East Drinker Street,  
Dunmore, PA 18512

Date: February 15, 2016

**BY THE COURT:**

By: \_\_\_\_\_  
**Elizabeth H. Barnes**  
**Presiding Administrative Law Judge**