



Thomas J. Sniscak
(717) 236-1300 x224
tjsniscak@hmslegal.com

Christopher M. Arfaa
(717) 236-1300 x231
cmarfaa@hmslegal.com

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

November 29, 2017

BY ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – Filing Room
Harrisburg, PA 17120

RE: Application of PPL Electric Utilities Corporation For approval to Rebuild the Hosensack Quarry # 1 and #2 138/69kV Transmission Line in Lehigh and Northampton Counties, Pennsylvania; Docket No. A-2017-2625559; PSU
PREHEARING MEMORANDUM

Dear Secretary Chiavetta:

Enclosed you will find The Pennsylvania State University's Prehearing Memorandum in the above-referenced proceedings. Copies have been served in accordance with the attached Certificate of Service.

If you have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,

Thomas J. Sniscak
Christopher M. Arfaa
Counsel to The Pennsylvania State University

TJS/das
Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities
Corporation for Approval to Rebuild the
Hosensack Quarry #1 and #2 138/69 Kv
Transmission Line in Lehigh and
Northampton Counties, Pennsylvania

Docket No. A-2017-2625559

**PREHEARING MEMORANDUM OF
THE PENNSYLVANIA STATE UNIVERSITY**

To: The Honorable Steven K. Haas

The Pennsylvania State University (“PSU”), by and through its attorneys in this matter, Hawke McKeon & Sniscak LLP, hereby submits its Prehearing Memorandum pursuant to the Prehearing Conference Order issued October 2, 2017, and 52 Pa. Code § 5.222.

I. ACCEPTANCE OF SERVICE

Service of documents in this proceeding should be made on the following individual:

Thomas J. Sniscak, Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
Phone: 717-236-1300
Fax: 717-236-4841
tjsniscak@hmslegal.com

Counsel for PSU are also willing to accept electronic service and request that the electronic service list utilized by the parties in this proceeding include Thomas J. Sniscak (tjsniscak@hmslegal.com) and Christopher M. Arfaa (cmarfaa@hmslegal.com), as counsel for PSU, and James Crist P.E. (JLCrist@aol.com) and Michael I. Prinkey, P.E., Sr. Energy Program

Engineer (mip103@psu.edu), as expert witnesses for PSU. PSU is willing to extend the same courtesy to other parties upon request.

II. MODIFICATIONS OF DISCOVERY PROCEDURES

PSU is not seeking modification of time deadlines set forth in the Commission's discovery regulations at this time.

III. PROPOSED LITIGATION SCHEDULE

PSU, as an intervenor, does not have a specific, proposed schedule for the litigation of this matter. PSU is of course willing to work with the other parties to develop a mutually-agreeable schedule.

IV. WITNESSES

PSU is continuing to review the application and has not yet determined which witness(es) it intends to call in this matter. PSU will notify the ALJ and all parties of record of the identity of such witness(es) when that determination is made.

PSU reserves the right to adopt any testimony of other witnesses, in whole or in part, and to offer additional witnesses and exhibits as may be necessary to address the testimony, exhibits, or evidence that may be presented by any party in this proceeding.

V. ISSUES

At this juncture, subject to PSU's continuing review of the application and subject to further issues raised in discovery and by PSU and other parties, the issues PSU intends to address include the following:

- The impact and the efforts which have been and will be made to minimize the impact, if any, of the proposed transmission line upon land use, including PSU's rights to occupy, use and otherwise enjoy its land that is subject to, and/or proximate to, the right-of-way in which Applicant seeks to site the transmission line.
- The availability of reasonable alternative routes.

WHEREFORE, The Pennsylvania State University respectfully submits this Prehearing Memorandum.

Respectfully submitted,



Thomas J. Sniscak, Attorney I.D. # 33891
Christopher M. Arfaa, Attorney I.D. # 57047
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17105-1778
E-mail: tjsniscak@hmslegal.com
E-mail: cmarfaa@hmslegal.com
Telephone: (717) 236-1300
Facsimile: (717) 236-4841

*Counsel for
The Pennsylvania State University*

Dated: November 29, 2017

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).

Christopher T Wright Esquire
Post & Schell
17 N Second Street 12TH Floor
Harrisburg PA 17106-1601

Office Of Consumer Advocate
555 Walnut Street
5TH Floor Forum Place
Harrisburg PA 17101-1923

Office Of Field Operations
PA Dept Of Environmental Protection
Market Street State Office Bldg
PO Box 2036
Harrisburg PA 17105-2063

Office Of Small Business Advocate
300 N Second Street Suite 202
Harrisburg PA 17101

Lehigh County Office Of The Executive
Government Center
17 S Seventh Street
Allentown PA 18101

PA Public Utility Commission
Bureau Of Investigation & Enforcement
PO Box 3265
Harrisburg PA 17105-3265

Brad Osborne Chairman
Lehigh County Board Of Commissioners
17 S Seventh Street
Allentown PA 18101

Becky Bradley Exec Dir
Lehigh Valley Planning Commission
961 Marcon Boulevard
Suite 310
Allentown PA 18109

William Mcfadden Distric Manager
Lehigh County Conservation District
4184 Dorney Park Road
Suite 105
Allentown PA 18104

Jeff Zehr Director Of Farmland
Lehigh County Bureau Of Agricultural
Land Preservation
4184 Dorney Park Road Suite 117
Allentown PA 18104

John A Brown County Exec
Northampton County
Northampton County Courthouse
669 Washington Street
Northampton PA 18042-7475

John Cusick Council President
Northampton County Council
Northampton County Courthouse
669 Washington Street
Northampton PA 18041

Terry Kromer Chairperson
Northampton County Farmland
Preservation Board
14 Gracedale Avenue
Nazareth PA 18064

Donald Mack Chairman
Northampton County Conservation District
Greystone Building
14 Gracedale Avenue
Nazareth PA 18064

Ellen Koplin Manager
Lower Milford Township
7607 Chestnut Hill Church Road
Coopersburg PA 18036

Donna Wright Chairperson
Lower Milford Township
Board Of Supervisors
7607 Chestnut Hill Church Road
Coopersburg PA 18036

Charles Beck Chairman
Salisbury Township
Planning Commission
2900 South Pike Avenue
Allentown PA 18103

Thomas Beil Manager
Upper Saucon Township
5500 Camp Meeting Road
Center Valley PA 18034

Stephen Wagner Chairman
Upper Saucon Township
Board Of Supervisors
5500 Camp Meeting Road
Center Valley PA 18034

John Landis Chairman
Lower Saucon Township
Planning Commission
3700 Old Philadelphia Pike
Bethlehem PA 18015

Upper Milford Township
5671 Chestnut Street
PO Box 210
Old Zionsville PA 18068

John J. Blair
1412 Walter Street, Suite 7
Bethlehem, PA 18015

Lois Gadek Chairperson
Lower Milford Township
Planning Commission
7607 Chestnut Hill Church Road
Coopersburg PA 18036

Randy Soriano Township Manager
Salisbury Township
2900 South Pike Avenue
Allentown PA 18103

James Brown President
Salisbury Township
Board Of Commissioners
2900 South Pike Avenue
Allentown PA 18103

Samanthia Ciotti Falcone Chairperson
Upper Saucon Township
Planning Commission
5500 Camp Meeting Road
Center Valley PA 18034

Jack Cahalan Manager
Lower Saucon Township
3700 Old Philadelphia Pike
Bethlehem PA 18015

Ron Horiszny President
Lower Saucon Township Council
3700 Old Philadelphia Pike
Bethlehem PA 18015

PA Fish and Boat Commission
595 E. Rolling Ridge Drive
Bellefonte, PA 16823-9620
ATTN: Christopher A. Urban

Myron R. Haydt Developer Inc.
2105 Sonoma Drive
Bethlehem, PA 18015

Certificate of Service
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John & Clauddine Bertalan
1824 Church Road
Bethlehem, PA 18015
Michael Crossley
3851 Quarry Drive
Emmaus, PA 18049

Lloyd C. & Ruth K. Ohl
6113 Limeport Pike
Coopersburg, PA 18036-9102



Thomas J. Sniscak
Christopher M. Arfaa

Dated this 29th day of November, 2017.