



Heather M. Hunter  
Paralegal  
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Ext. 148

February 20, 2018

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
Commonwealth Keystone Bldg.  
400 North Street  
Harrisburg, PA 17120

**Re: Application of Transource Pennsylvania, LLC Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval of the Siting and Construction of the 230kV Transmission Line Associated with the Independence Energy Connection-East Project in Portions of York County, Pennsylvania  
Docket No. A-2017-2640195**

Dear Secretary Chiavetta:

Enclosed please find the Maple Lawn Farms, Inc.'s Protest to an Application that was filed today, February 20, 2018, in the above-referenced proceeding.

Copies have been serviced as indicated in the Certificate of Service.

Sincerely,

Heather M. Hunter  
Paralegal

HMH/cga

Counsel for:  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048 Fax: (717) 783-7153

Enclosure

cc: Honorable Elizabeth H. Barnes, ASLJ  
Honorable Andrew M. Calvelli  
Certificate of Service

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**APPLICATION OF TRANSOURCE : DOCKET NO. A-2017-2640195**  
**PENNSYLVANIA, LLC FILED PURSUANT :**  
**TO 52 PA. CODE CHAPTER 57, :**  
**SUBCHAPTER G, FOR APPROVAL OF THE :**  
**SITING AND CONSTRUCTION OF THE :**  
**230 KV TRANSMISSION LINE ASSOCIATED :**  
**WITH THE INDEPENDENCE ENERGY :**  
**CONNECTION-EAST PROJECT IN :**  
**PORTIONS OF YORK COUNTY, :**  
**PENNSYLVANIA :**

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**MAPLE LAWN FARMS, INC.'S  
PROTEST TO AN APPLICATION**

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Maple Lawn Farms, Inc. (Maple Lawn Farms), hereby files this Protest to an Application before the Pennsylvania Public Utility Commission (“Commission”) in matters pertaining to Transource Pennsylvania, LLC’s (Transource) Application for Approval of the Siting and Construction of the 230 kV Transmission Line (Transmission Line) Associated with the Independence Energy Connection – East Project in Portions of York County, Pennsylvania (Application) in the above-captioned proceeding, Docket No. A-2017-2640195. In support of this Protest, Maple Lawn Farms states the following:

1. Maple Lawn Farms owns the farmland located at 251 E. Maple Lawn Rd, New Park, PA 17352.

2. Maple Lawn Farms maintains its office at 251 E. Maple Lawn Road, New Park, PA 17352. Maple Lawn Farms, Inc. is represented by:

Anne E. Zerbe, Esq.  
(PA ID 79151)

E-mail: azerbe@cgalaw.com  
CGA Law Firm  
135 North George Street  
York, PA 17401  
Email: azerbe@cgalaw.com  
Telephone: (717)-718-7104  
Facsimile: (717) 843-9039

3. If the Application is approved, the Transmission Line would cut through the heart of Maple Lawn Farms.

4. As such, Maple Lawn Farms has a direct interest in the Application.

5. Paul McPherson, generation 4, is the President of Maple Lawn Farms.

6. Hugh McPherson, generation 5, is the Corporate Secretary of Maple Lawn Farms.

7. Maple Lawn Farms has been in the McPherson family for over 100 years.

8. Maple Lawn Farms is a recognized Pennsylvania Century Farm.

9. The Pennsylvania Department of Agriculture implemented the Century Farm Program to emphasize the importance of economic and rural heritage and traditions.

10. The Century Farm Program recognizes the farms and families that contribute so much to Pennsylvania's heritage and who foster and preserve its agricultural legacy.

11. Maple Lawn Farms has been contributing to Pennsylvania's agricultural heritage and legacy for over 100 years.

12. The current view shed of Maple Lawn Farms is unobstructed, and provides a breath-taking view of rolling farmland of Southern York County.

13. As explained below, this view shed is a critical feature and key draw for tourists and customers to Maple Lawn Farms.

14. Maple Lawn Farms has preserved its unspoiled, unencumbered and vast scenic view of rural farmland for over 100 years.

15. This magnificent view shed is a critical aesthetic feature of Maple Lawn Farms.
16. Maple Lawn Farms attracts many of its customers from suburban areas and cities, who come to Maple Lawn Farms to enjoy the beauty and serenity of the scenic farm.
17. Maple Lawn Farms grows cherries, blueberries, apricots, peaches, apples, pumpkins and other orchard fruit.
18. Maple Lawn Farms offers Pick-Your-Own fruit for its customers.
19. Maple Lawn Farms also operates Maize Quest Corn Maze and Maize Quest Fun Park.
20. The Maize Quest Corn Maze is one of the original corn mazes in America, founded in 1997.
21. The Maize Quest Corn Maze is world-famous.
22. The Maize Quest Corn Maze attracts over 30,000 people and families from all over the county to take on the challenge of navigating its thematic corn maze that extends over 9 acres.
23. A key feature of the world-famous corn maze includes the tower, from which the public can enjoy a bird's eye view of the incredible view shed.
24. The Maize Quest Fun Park includes one of the largest collections of people-sized puzzles in the world covering an additional 5 acres of public attractions.
25. The Maize Quest Fun Park includes other family friendly activities, including but not limited to the Cow Train, Pedal Carts, Mountain Slide and Bamboo Maze.
26. Maple Lawn Farms hosted the first annual Sunflower Festival, which became the largest Sunflower Festival in Central Pennsylvania in its first year by hosting over 2,500 guests to enjoy scenic views of sunflower varieties.

27. The Transmission Line would destroy the aesthetic and physical environment of the Forn Maze, Fun Park Farm, Orchard, and Sunflower Festival Field.

28. Maple Lawn Farms offers tours for school children and other groups who learn about the rich agricultural heritage and tradition, educate themselves on how important agriculture is for our society and learn healthy and nutritional eating habits.

29. Teachers and schools select Maple Lawn Farms because of its rural location and unspoiled farmland and view, which is wholly different from suburban or city landscapes.

30. Other customers visit Maple Lawn Farms because of the unspoiled and rural view shed, which extends unencumbered for miles.

31. Maple Lawn Farms' business depends on selling directly to consumers via Pick-Your-Own.

32. The Transmission Lines will blight the scenic York County farmland that attracts so many customers to enjoy the scenic view while picking orchard fruit and berries.

33. If the Application is approved, the Transmission Lines will absolutely destroy the primary aesthetic feature of Maple Lawn Farms.

34. Once the view shed is marred by massive Transmission Line towers and wires, the aesthetic culture and heritage is lost forever.

35. The destruction of this centuries old view will negatively impact the farm and tourism operations of Maple Lawn Farms.

36. The Transmission Lines will cause a loss and decline of tourism and business of Maple Lawn Farms.

37. Maple Lawn Farms employs over 85 people through its farming and tourism operations.

38. A reduction in tourism or business will jeopardize the jobs of Maple Lawn Farms' employees.

39. In the past, Maple Lawn Farms operated animal production facilities.

40. As markets change, Maple Lawn Farms must be ready to adapt to changing markets and business demands.

41. The Transmission Line would directly limit its ability to build farm buildings that may be necessary to ensure that future generations of the McPherson family can sustain farming on the land.

42. Further, all jobs associated with building the Transmission Lines are temporary.

43. Maple Lawn Farms has been farming in this community for over 100 years.

44. Maple Lawn Farms employs over 85 people in the local community.

45. Loss of the current aesthetic scenery will ruin the centuries old heritage and tradition of this rural farming community.

46. Commercial farmers face razor-thin profit margins.

47. During construction, Maple Lawn Farms will sustain damage to crops. This will decrease its profits.

48. During construction, large portions of farmland will be unusable, resulting in more lost profits.

49. Further, limitations on crop varieties placed on the land under the power lines forever restricts Maple Lawn Farm's ability to grow new crops and adapt to future farming practices.

50. The Transmission Line will also degrade the surrounding environment and intrude on the scenic view of the landscape.

51. The Transmission Line will irreparably harm the farming and tourism operations

of Maple Lawn Farms.

52. The Transmission Lines will permanently destroy the rich historical and aesthetic culture of this Century Farm.

53. As set forth in Transource submissions of alternate routes, less intrusive, alternative routes exist that would not damage this Century Farm and ruin the view shed.

54. Mitigation is possible and should occur in order to avoid ruining these pristine and prized rural landscapes and centuries old farming and tourism operations.

55. Alternate routes would not destroy the view shed of this Century Farm or impede tourism operations by permanently scarring the view.

56. Protestant reserves the right to raise other and more specific objections as necessary and appropriate during the course of the proceeding.

**WHEREFORE**, Maple Lawn Farms, Inc., respectfully requests that the Pennsylvania Public Utility Commission carefully consider the facts set forth in this Protest, give significant weight to the unique history, culture and traditions of Maple Lawn Farms and its highly recognized and prized aesthetic attributes and rich farming heritage that will be permanently destroyed by the construction and implementation of the Transmission Line and deny the Transource Application.

Respectfully submitted,

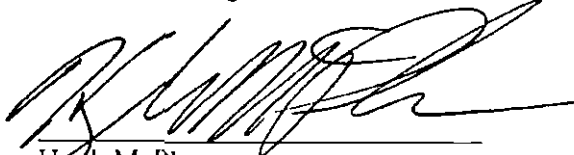
/s/Anne E. Zerbe, Esquire

Dated: February 20, 2018

Anne E. Zerbe, Esquire  
PA ID #79151  
CGA Law Firm  
135 N. George St.  
York, PA 17401  
Phone: 717-848-4900  
Fax: 717-843-9039  
Email: azerbe@cgalaw.com

VERIFICATION OF MAPLE LAWN FARMS, INC.

I, Hugh McPherson, Corporate Secretary, Maple Lawn Farms, Inc., hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).



Hugh McPherson  
Corporate Secretary

Date:

2/16/18

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## CERTIFICATE OF SERVICE

Re: Application of Transource Pennsylvania, LLC Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval of the Siting and Construction of the 230kV Transmission Line Associated with the Independence Energy Connection-East Project in Portions of York County, Pennsylvania  
Docket No. A-2017-2640195

I hereby certify that I have this day served a true copy of the foregoing document, the Maple Lawn Farms, Inc.'s Protest to An Application, upon the parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 20<sup>th</sup> day of February 2018

### SERVICE BY E-MAIL and FIRST CLASS MAIL

The Honorable Elizabeth H. Barnes  
The Honorable Andrew M. Calvelli  
Administrative Law Judges  
PO Box 3265  
Harrisburg, PA 17105-3265

Amanda Riggs Conner, Esq.  
Hector Garcia, Esq.  
American Electric Power Service  
1 Riverside Plaza, 29<sup>th</sup> Floor  
Columbus, OH 43215

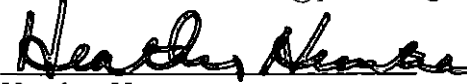
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Heather Hunter

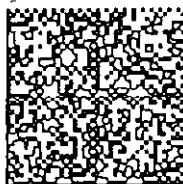
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Rosemary Chiavetta, Secretary  
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