

February 20, 2018

Via UPS

Rosemary Chiavetta, Esquire
Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Docket No. A-2017-2640195
Application of Transource Pennsylvania LLC
Petition to Intervene of Citizens to STOP Transource**

Dear Secretary Chiavetta:

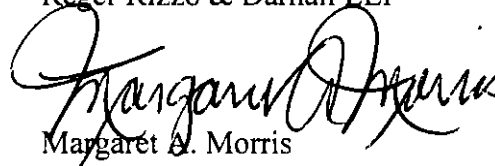
Enclosed for filing are the original and one copy of the Petition to Intervene of Citizens to STOP Transource to be filed in the above referenced matter. Kindly file the original of record and return the date-stamped copy in the enclosed self-addressed, stamped envelope.

A copy of the Petition to Intervene has been forwarded in the manner indicated on the attached Certificate of Service.

If there are any questions, please contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/jmm
Enclosures

cc: The Honorable Andrew Calvelli, PA Public Utility Commission [w/enc.]
The Hon. Elizabeth Barnes, Pennsylvania Public Utility Commission [w/enc.]
Citizens to STOP Transource [w/enc.]
Service list [w/enc.]

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC for :
approval of the Siting and Construction of the :
230 kV Transmission Line associated with the : A-2017-640195
Independence Energy Connection-East Project :
in Portions of York County, Pennsylvania. :

**PETITION TO INTERVENE OF
CITIZENS TO STOP TRANSOURCE**

Citizens to STOP Transource (Citizens), by and through its undersigned attorneys, REGER RIZZO & DARNALL LLP, pursuant to 52 Pa. Code §§ 5.71-74, hereby files this Petition to Intervene in the above-captioned proceeding. Citizens has a direct and substantial interest in the issues raised in this proceeding that cannot be represented by any other party. In support of this Petition, Citizens states as follows:

I. INTRODUCTION

1. On December 27, 2017, Transource Pennsylvania, LLC (Transource or Applicant) filed an Application for Approval of the Siting and Construction of the 230 kV transmission line associated with the Independence Energy Connection Project in a portion of York County, Pennsylvania (Application).

II. CITIZENS' INTEREST AND STANDING

2. Citizens, a 501(c)(4) organization, has its principal office located 251 East Maple Lawn Road, New Park, PA 17352.

3. Citizens' attorney for the purpose of receiving service of all documents in this proceeding is:

Margaret A. Morris, Esq.
REGER RIZZO & DARNALL LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
(215) 495-6524 (voice)
(215) 495-6600 (fax)
mmorris@regerlaw.com

4. Counsel for Citizens is authorized to accept service on its behalf. Citizens requests that the Commission and all parties of record serve copies of all documents (including but not limited to correspondence, discovery requests and answers, commission orders, pleadings and testimony) electronically on its counsel of record as well as by hard copy.

5. Each member of Citizens is a landowner who is directly affected by the Application.

6. As a result of Transource's decision to locate the Project across property owned by each of its members, the collective property rights of Citizens are adversely affected in that each member may be unable to use and or/develop individually owned property appropriately.

7. Citizens has a direct and substantial interest in the proceeding, which is not adequately represented by existing participants. The individual rights of each member will be directly affected if the Commission grants the Application. Each member of Citizens may be bound by the action of the Commission. Citizens therefore satisfies the standards for intervention established by the Commission in 52 Pa. Code §5.72(a).

8. Based on a preliminary review of the Application, Citizens has identified the following issues that require further consideration by the Commission and must be resolved prior to a Commission decision on the Application:

- a. Transource has not proven the need for the Project.
- b. The Project will not bring cost savings to ratepayers in the Commonwealth.
- c. There is an existing right-of-way with existing towers that are only half energized.
- d. The Project as proposed will have a significant and substantial impact on the economics and esthetics of the individually owned property of each member of Citizens.
- e. The proposed path for the Project will negatively impact land owned by the members of Citizens, which is specifically cultivated for agriculture production.

9. Due to the early stage of the proceeding, Citizens reserves the right to raise additional issues that may arise after it has had an opportunity to further evaluate Transource's filings, conduct discovery and review additional information that be provided, and /or issues that may be identified by other parties.

III. CONCLUSION

WHEREFORE, Citizens to STOP Transource respectfully requests that the Commission

and the presiding Administrative Law Judges grant its Petition to Intervene with full party status in this proceeding.

Respectfully submitted,

REGER RIZZO & DARNALL LLP



Margaret A. Morris, Esq.

Attorney I.D. # 75048

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Dated: February 20, 2018

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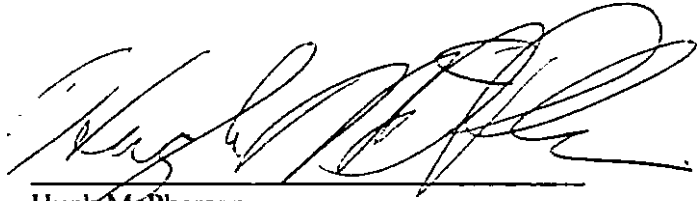
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VERIFICATION

I, Hugh McPherson, of Citizens to STOP Transource, am authorized to make this Verification on its behalf, and I verify that the information provided in the foregoing document(s) is true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to forsworn falsifications to authorities.



Hugh McPherson
Citizens to STOP Transource

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the person(s) listed below, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

David B. MacGregor
Anthony D. Kanagy
Christopher T. Wright
Post & Schell PC
17 North Second Street, 12th Floor
Harrisburg, PA 17101

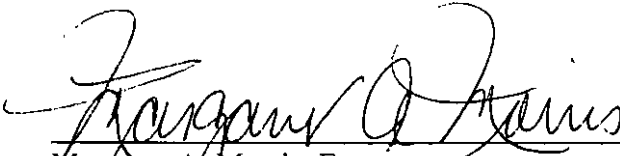
Amanda Riggs Connor
Hector Garcia
American Electric Power Service Corp.
1 Riverside Plaza, 29th Floor
Columbus, OH 43215

Richard A. Kanaskie
Bureau of Investigation and Enforcement
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

John R. Evans
Office of the Small Business Advocate
300 North Second Street
Suite 1102
Harrisburg, PA 17101

Tanya J. McCloskey
Darryl A. Lawrence
Office of the Consumer Advocate
Forum Place
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1921

Dated: February 20, 2018


Margaret A. Morris, Esq.

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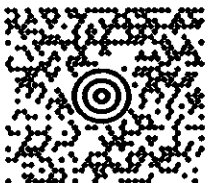

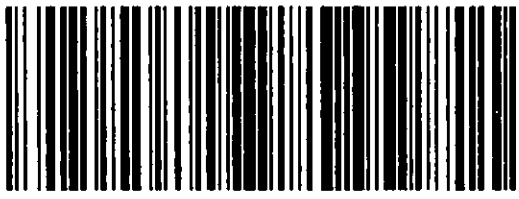
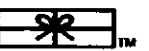
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