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March 8, 2018

**VIA eFILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
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 230 kV Transmission Line Associated with the Independence Energy Connection-East Project in Portions of York County, Pennsylvania  
Docket No. A-2017-2640195**


**Application of Transource 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-West Project in Portions of Franklin County, Pennsylvania  
Docket No. A-2017-2640200**

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced dockets is the **Prehearing Memorandum of PECO Energy Company**.

If you have any questions regarding this filing, please do not hesitate to contact me at 215-841-4353.

Very truly yours,



Jennedy S. Johnson

Enclosures

cc: Honorable Elizabeth A. Barnes  
Honorable Andrew M. Calvelli

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**Application of Transource Pennsylvania, :  
LLC Filed Pursuant to 52 Pa. Code :  
Chapter 57, Subchapter G, for Approval :  
of the Siting and Construction of the :     Docket No.   A-2017-2640200  
230 kV Transmission Line Associated :  
With the Independence Energy :  
Connection-West Project in Portions of :  
Franklin County, Pennsylvania :**

**PREHEARING MEMORANDUM OF  
PECO ENERGY COMPANY**

Pursuant to Section 333 of the Public Utility Code, 66 Pa.C.S. Section 333, and in response to the February 26, 2018 Prehearing Conference Order issued in the above-captioned proceedings, PECO Energy Company (PECO) provides the following:

**I. INTRODUCTION**

On December 27, 2017, Transource filed with the Pennsylvania Public Utility Commission (“Commission”) two Applications for Approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection Project in portions of York and Franklin Counties, Pennsylvania (“Application”).<sup>1</sup> In its Applications, Transource seeks Commission approval to implement a PJM Market Efficiency Project (the “Independence Energy Connection Project” or “IEC Project”) to alleviate transmission congestion. Application at 1. Specifically, under the IEC Project, Transource will construct, own, maintain, and operate two new

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<sup>1</sup> Transource requests that the two Siting Applications at Docket Nos. A-2017-2640195 and A-2017-2640200 be consolidated for the purposes of hearings and decisions. Application at 2.

electric transmission substations in Pennsylvania, as well as the Pennsylvania portions of two new 230kV interstate transmission lines – the Furnace Run-Conastone line (the “IEC-East Project”) and the Rice-Ringgold line (the “IEC-West Project”). *Id.* at 1-2.

These Applications were assigned to the Office of Administrative Law Judge and were further assigned to Administrative Law Judges Elizabeth A. Barnes and Andrew M. Calvelli for investigation and the scheduling of hearings. On February 26, 2018, ALJs Barnes and Calvelli issued a Prehearing Conference Order indicating that an Initial Prehearing Conference was scheduled for March 13, 2018. This Order also detailed the parties’ obligations with respect to the Prehearing Conference.

On February 14, 2018, PECO filed a Petition to Intervene in the proceedings. PECO submits this Prehearing Memorandum in accordance with the Prehearing Conference Order in these Applications.

## **II. ITEMS RAISED IN THE PREHEARING CONFERENCE ORDER**

### **A. Consolidation of Cases**

- PECO takes no position on this issue.

### **B. Any forthcoming eminent domain or shelter applications**

- PECO is unaware of Transource PA’s pending applications.

### **C. Petitions to Intervene**

- PECO requests that its Petition to Intervene be granted. PECO has a direct and substantial interest in the issues raised in these proceedings because a portion of the IEC Project would be connected to PECO infrastructure. Further, any modifications made to the IEC Project during this proceeding could result in obligations for PECO and ultimately its customers, and PECO may be bound by the action of the Commission in these proceedings. *See* 52 Pa. Code § 5.72(2)(2). Therefore, PECO’s interest cannot be adequately represented by any other party in this proceeding, and PECO will be uniquely impacted by the developments in and the outcome of this proceeding.

D. Service List

- PECO requests that its entry on the Service List be corrected, as follows:

Romulo L. Diaz, Jr.  
Jack R. Garfinkle  
Jennedy S. Johnson  
PECO Energy Company  
2301 Market Street, S23-1  
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E. Issues

- At this time, PECO's interests in this proceeding stem from the fact that the IEC Project would be connected to PECO infrastructure and that any changes could result in obligations for PECO and ultimately its customers. PECO is in the beginning stages of its evaluation of Transource's proposals and has no additional issues at this time. PECO specifically reserves the right to raise additional issues, as necessary.

F. Statutory deadline and possibility of waiver

- PECO takes no position on this issue.

G. Witnesses

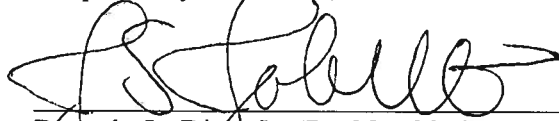
- PECO has not identified any witnesses at this time, and specifically reserves the right to call a witness or witnesses, as necessary. As soon as PECO has determined whether any witness or witnesses will be necessary, PECO will promptly notify ALJs Barnes and Calvelli and all parties of record.

H. Procedural Schedule

- PECO will work with the ALJs and the Parties to arrive at a mutually agreeable schedule.

- I. Other Matters: Exchange of Exhibits; Admissions, stipulations, and authentication of documents; transcript turnaround; discovery rules modifications; and briefing outline
- o PECO takes no position on these issues.

Respectfully submitted,



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Dated: March 8, 2018

#4601770

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of Transource Pennsylvania, :  
LLC Filed Pursuant to 52 Pa. Code :  
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230 kV Transmission Line Associated :  
With the Independence Energy :  
Connection-East Project in Portions of :  
York County, Pennsylvania :**

**Application of Transource Pennsylvania, :  
LLC Filed Pursuant to 52 Pa. Code :  
Chapter 57, Subchapter G, for Approval :  
of the Siting and Construction of the :     Docket No.   A-2017-2640200  
230 kV Transmission Line Associated :  
With the Independence Energy :  
Connection-West Project in Portions of :  
Franklin County, Pennsylvania :**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the Prehearing Memorandum of PECO Energy Company upon the parties of record in these proceedings in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the matter and upon the persons listed below via first class mail:

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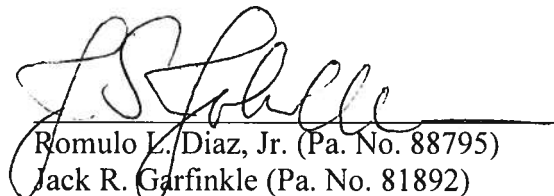
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