

March 8, 2018

Via Electronic Filing

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

**Re: Docket Nos. A-2017-2640195 and A-2017-2640200
Application of Transource Pennsylvania LLC
Prehearing Conference Memo of Citizens to STOP Transource**

Dear Secretary Chiavetta:

Attached for filing is the Prehearing Conference Memorandum of Citizens to STOP Transource (Citizens) in the above referenced proceeding.

A copy of the Memorandum has been forwarded to the parties 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
Attachment

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

**Re: Docket Nos. A-2017-2640195 and A-2017-2640200
Application of Transource Pennsylvania LLC
Prehearing Conference Memo of Citizens to STOP Transource**

CERTIFICATE OF SERVICE

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

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Dated: March 8, 2018



Margaret A. Morris, Esquire

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 : A-2017-2640195
Construction of the 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 : A-2017-2640200
Construction of the 230 kV Transmission Line :
Associated with the Independence Energy :
Connection – West Project in Portions of Franklin :
County, Pennsylvania :

**PREHEARING CONFERENCE MEMORANDUM OF
CITIZENS TO STOP TRANSOURCE**

Pursuant to the February 26, 2018 Prehearing Conference Order of the Honorable Elizabeth H. Barnes and Andrew M. Calvelli, and Commission regulations at 52 Pa. Code § 5.222, Citizens to STOP Transource (Citizens) submits the following in response to Paragraph 6 of that Order.

a. *Consolidation of cases.*

Citizens does not oppose the consolidation of the dockets.

b. *Any forthcoming eminent domain or shelter applications.*

Citizens notes that Transource filed an action in the York County Court of Common Pleas at Docket No. 2018-SU-000565 asserting eminent domain against its members. Citizens has retained counsel and opposes Transource’s request for access to the members’ property.

c. *Petitions to Intervene.*

Citizens timely filed its Petition to Intervene in Docket No. A-2017-2640195 (East Project) and requests the Petition be granted and that Citizens be granted full party status. 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).

d. *Service List*

Citizens requests that Margaret A. Morris, Esquire and Linell M. Lukesh, Esquire be listed on the Commission's service list on behalf of Citizens. The contact information for counsel is provided below:

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Citizens agrees to receive service of documents electronically in this proceeding followed by a hard copy.

e. *Issues.*

Regarding the East Project, Citizens is currently investigating and analyzing the following general issues:

1. Need for the East Project.
2. Availability of reasonable alternatives.
3. Environmental and Land use Impacts.
4. Contrary to the protection of natural resources in the Commonwealth

Citizens reserves the right to expand or narrow the issues it will address, as necessary.

f. *Statutory deadline and possibility of waiver.*

Citizens supports the position of the Office of Consumer Advocate (OCA) on this issue.

g. *Witnesses.*

Citizens anticipates associating with the testimony of the OCA's witnesses. In addition, Citizens will offer the testimony of Sean Cully, Master of the Rose Tree Hunt Club,¹ which will be directly affected by the proposed route since it utilizes the land owned by members of Citizens. Citizens reserves the right to call any additional witnesses based on issues identified by the parties:

h. *Procedural schedule.*

Citizens support the procedural schedule proposed by the OCA.

i. *Public Input Hearings*

Citizens support the position of the OCA on this issue.

¹ The Rose Tree Hunt Club is the oldest subscription hunt in America on record.

j. *Site Views*

Citizens strongly supports the use of site visits to the affected members' properties so that the presiding Judges, attorneys and the interested parties can view the properties and listen to the specific concerns relating to the potential effect of the East Project on the locations.

Respectfully submitted,

Dated: March 8, 2018



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