



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Main Fax  
www.postschell.com

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Anthony D. Kanagy

akanagy@postschell.com  
717-612-6034 Direct  
717-731-1985 Direct Fax  
File #: 166570

March 8, 2018

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

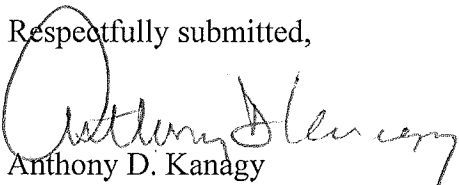
**Re: Application of Transource Pennsylvania, LLC Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-East Project in Portions of York County, Pennsylvania - Docket No. A-2017-2640195**

**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 is the Prehearing Memorandum of Transource Pennsylvania, LLC for the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Anthony D. Kanagy

ADK/jl  
Enclosures

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

ALLENTOWN HARRISBURG LANCASTER PHILADELPHIA PITTSBURGH PRINCETON WASHINGTON, D.C.

A PENNSYLVANIA PROFESSIONAL CORPORATION

## CERTIFICATE OF SERVICE

**Docket Nos. A-2017-2640195 & A-2017-2640200**

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

### VIA E-MAIL & FIRST CLASS MAIL

ANNE E ZERBE ESQUIRE  
CGA LAW FIRM  
135 N GEORGE ST  
YORK PA 17401  
*Representing Maple Lawn Farms, Inc.  
Rose Tree-Blue Mountain Hunt Club, Inc.*

JOANNA A WALDRON ESQUIRE  
CURTIN & HEEFNER LLP  
DOYLESTOWN COMMERCE CENTER  
2005 S EASTON ROAD SUITE 100  
DOYLESTOWN PA 18901  
*STOP Transource Franklin County*

TERESA HARROLD ESQUIRE  
FIRSTENERGY  
2800 POTTSVILLE PIKE  
PO BOX 16001  
READING PA 19612-6001  
*Representing MAIT*

THOMAS J SNISCAK ESQUIRE  
WHITNEY E SNYDER ESQUIRE  
HAWKE MCKEON AND SNISCAK LLP  
100 N TENTH STREET  
HARRISBURG PA 17101  
*Representing York County Planning  
Commission*

JACK GARFINKLE ESQUIRE  
JENNEDY S JOHNSON ESQUIRE  
ROMULO L DIAZ JR ESQUIRE  
EXELON BUSINESS SERVICES  
2301 MARKET STREET  
LEGAL DEPT S23-1  
PHILADELPHIA PA 19103  
*Representing PECO Energy Company*

PHILLIP D DEMANCHICK ESQUIRE  
DAVID T EVRARD ESQUIRE  
DARRYL A LAWRENCE ESQUIRE  
OFFICE OF CONSUMER ADVOCATE  
555 WALNUT STREET 5TH FLOOR  
FORUM PLACE  
HARRISBURG PA 17101

SHARON E WEBB ESQUIRE  
OFFICE OF SMALL BUSINESS  
ADVOCATE  
300 NORTH SECOND STREET SUITE 202  
HARRISBURG PA 17101

MARGARET A MORRIS ESQUIRE  
REGER RIZZO & DARNALL  
2929 ARCH STREET 13TH FLOOR  
PHILADELPHIA PA 19104  
*Representing Citizens to STOP Transource*

VIA FIRST CLASS MAIL

THE HONORABLE SCOTT WAGNER  
SENATOR  
SENATE BOX 203028  
HARRISBURG PA 17120-3028

THE HONORABLE KRISTIN PHILLIPS-  
HILL  
PENNSYLVANIA HOUSE OF  
REPRESENTATIVES  
PO BOX 202093  
HARRISBURG PA 17120-2093

J ROSS MCGINNIS  
41 WEST MAIN STREET  
FAWN GROVE PA 17321

JOHN L KENNEDY  
LOUISE S KENNEDY  
490 KENNEDY ROAD  
AIRVILLE PA 17302

STEPHEN SNELL  
544 CRESTWOOD DRIVE  
RED LION PA 17356

JERRY TAYLOR  
PATRICE TAYLOR  
183 BUECKER RD  
DELTA PA 17314

MELANIE GOSS  
GREGORY GOSS  
289 LEIB ROAD  
NEW PARK PA 17352

SHANE TAYLOR  
SHARLIE TAYLOR  
KRISTI TAYLOR  
118 GORAM RD  
BROGUE PA 17309

BARBARA GALLAGHER  
9 SCARBOROUGH FARE  
STEWARTSTOWN PA 17363

ROBERT BIESTER  
49 GORAM RD  
BROGUE PA 17309

GLORIA WOLFE  
JACK WOLFE  
153 W MAPLE LAWN ROAD  
NEW PARK PA 17352

JEFFREY NEUTZEL  
166 HOPEWELL ROAD  
NEW PARK PA 17352

BARRY SHENK  
17281 DRACO ROAD  
STEWARTSTOWN PA 17363

ABIGAIL ANDERSON  
GREG ANDERSON  
MORGAN ANDERSON  
TAYLOR ANDERSON  
VIRGINIA ANDERSON  
ZACKERY ANDERSON  
6038 TANNER LANE  
STEWARTSTOWN PA 17363

MARGARET TAYLOR  
109 NORRIS ROAD  
DELTA PA 17314

RONA KAUFMANN  
183 DUNKARD VALLEY ROAD  
YORK PA 17403

CARLY MILLER  
DONNA MILLER  
DAVID MILLER  
DYLAN MILLER  
JACK MILLER  
12261 WOODLAND DRIVE  
FELTON PA 17322

RANDALL STEWART JR  
TIFFANY PEIFFER  
110 HIGH STREET  
FELTON PA 17322

RANDALL STEWART  
PEGGY STEWART  
28 STEWART ROAD  
AIRVILLE PA 17302

KAY TAYLOR  
SAMUEL TAYLOR  
92 W HEFFNER ROAD  
BROGUE PA 17309

BRADLEY WALTERMYER  
329 BARE ROAD  
AIRVILLE PA 17302

STEPHEN HECNER  
THERESA NORRIS  
16783 DRACO ROAD  
NEW PARK PA 17352

BARBARA ANDERSON  
DAVID ANDERSON  
56 ZIMMERMAN ROAD  
AIRVILLE PA 17302

PATRICIA MILLER  
1914 WOODBINE ROAD  
AIRVILLE PA 17302

DAVID DOWNS  
1725 WOODBINE ROAD  
AIRVILLE PA 17302

WILLIAM TOMPKINS  
KATHLEEN TOMPKINS  
1056 MUDDY CREEK ROAD  
AIRVILLE PA 17302

ANDY TAYLOR  
118 WRIGHT ROAD  
DELTA PA 17314

JAMES MCGINNIS JR  
290 WOOLEN MILL ROAD  
NEW PARK PA 17352

AUSTIN TAYLOR  
372 W TELEGRAPH ROAD  
AIRVILLE PA 17302

KRISTIN THOMAS  
12951 WORKINGER ROAD  
BROGUE PA 17309

ALAN TAYLOR  
231 BUECKER ROAD  
DELTA PA 17314

MATTHEW KELLER  
1883 WOODBINE ROAD  
AIRVILLE PA 17302

STEPHEN AND DOLORES KRICK  
699 FROST HILL ROAD  
AIRVILLE PA 17302

BEN HEISHMAN  
341 GORAM ROAD  
BROGUE PA 17309

BAILEY ANDERSON  
BROOKE ANDERSON  
BRYCE ANDERSON  
CHRISTINE ANDERSON  
GARY ANDERSON  
322 MOHAWK DRIVE  
RED LION PA 17356

CAROLE LONG  
844 WOOLEN MILL ROAD  
STEWARTSTOWN PA 17363

CHRISTINE BLOUSE  
BRENTON BLOUSE  
IAN BLOUSE  
27 GODFREY ROAD  
FELTON PA 17322

ALAN YOST  
16154 LITTLE ROAD  
STEWARTSTOWN PA 17363

JAKE TAYLOR  
1505 WOOD BIRE ROAD  
AIRVILLE PA 17302

RAYMOND R LINS  
RACHEL L LINS  
1017 ORCHARD ROAD  
NEW PARK PA 17352

JASON WOLFE  
STACEY WOLFE  
3198 NEW PARK ROAD  
NEW PARK PA 17352

TWIN GOOD FARMS  
DAVID GOOD  
68 REED ROAD  
AIRVILLE PA 17302

BYRON JESS BOYD  
831 NEW PARK ROAD  
NEW PARK PA 17352

JOHN & CAROL HAMILTON  
562 WOOLEN ROAD  
STEWARTSTOWN PA 17363

HENRY & GLENDA SOMMER  
2340 NEW PARK ROAD  
NEW PARK PA 17352

MAPLE LAWN FARMS INC  
251 E MAPLE LAWN ROAD  
NEW PARK PA 17352

LAURIE DONALDSON  
241 GROVE RD  
STEWARTSTOWN PA 17363

KATHERINE STEWART  
14 E PENNSYLVANIA AVE  
YOE PA 17313

DANIEL MCELWAIN  
338 MARSTELLER RD  
NEW PARK PA 17352

DEREK DETTINGER  
24 CHANCEFORD RD  
BROGUE PA 17309

ROBERT BOWNMAN  
TRISHA BOWMAN  
11721 MUDDY CREEK RD  
AIRVILLE PA 17302

GREGORY WILT  
KRISTINA WILT  
353 MARSTELLER RD  
NEW PARK PA 17352

M KATHRYN JUDY  
STEPHEN JUDY  
93 KENNEDY RD  
AIRVILLE PA 17302

WESTLEY TOMPKINS  
360 HIGH ROCK RD  
AIRVILLE PA 17302

BRETT TOMPKINS  
245 ZION CHURCH RD  
RED LION PA 17356

BARRON & JANA SHAW  
445 SALT LAKE RD  
FAWN GROVE PA 17321

DIANE M NEFF  
586 FROSTY HILL ROAD  
AIRVILLE PA 17302

ROBERT MICKEY  
JOHNEVA MICKEY  
224 LEIB RD  
NEW PARK PA 17352

THOMAS KRELL JR  
APRIL KRELL  
6720 MACBETH WAY  
SYKESVILLE MD 21784

GEORGE TREADWAY  
2503 CRESTVIEW DR  
FALLSTON MD 21047

DAN MOSER  
MATT MOSER  
PAMELA MOSER  
ZAC MOSER  
233 W MAPLE LAWN RD  
NEW PARK PA 17352

HARRY PEIFFER JR  
113 DAD BURNHAMS RD  
PINE GROVE PA 17963

DALE SAXMAN  
2443 ARNOLD RD  
RED LION PA 17356

DAVID SAXMAN  
2192 CRALEY RD  
WINDSOR PA 17366

MELVIN SAYLOR  
516 BULL RUN RD  
WRIGHTSVILLE PA 17368

JESSE THOMPSON  
1415 PLEASANT GROVE RD  
RED LION PA 17356

JEREMIAH GOOD  
2159 BANNISTER ST  
YORK PA 17404

RUSSELL BURTON  
8 S MAIN ST  
JACOBUS PA 17407

JONATHAN HASH  
1790 NEW PARK RD  
NEW PARK PA 17352

KENT BLEVINS  
16186 W LIBERTY RD  
STEWARTSTOWN PA 17363

KELLY MUSSER  
5267 SNYDER LN  
YORK PA 17406

LEONARD TRAYNOR II  
JUSTINE TRAYNOR  
900 HICKORY HILL LN  
YORK PA 17402

MICHAEL CORDELL  
4219 ALTENWALD RD  
WAYNESBORO PA 17268

BRANDY MILLER  
333 TOMLINSON RD  
AIRVILLE PA 17302

GARLAND SWEITZER  
531 GOOD RD  
AIRVILLE PA 17302

WILLIAM GROVE  
63 W SNYDER CORNER RD  
RED LION PA 17356

BLAINE HAM  
615 SLAB RD  
DELTA PA 17314

KENNY GROVE  
278 OAKBROOK DR  
FELTON PA 17322

CLETUS GOHN  
DIANE GOHN  
737 GOOD RD  
AIRVILLE PA 17302

VIRGINIA & GINNY GIBBLE  
30 SCHOOL HOUSE RD  
LANCASTER PA 17603

KEVIN ELKO  
640 BRIDGETON RD  
FAWN GROVE PA 17321

TODD DORN  
8352 BLUE BALL RD  
STEWARTSTOWN PA 17363

BRIAN MCCLEARY  
72 W MAPLELAWN RD  
NEW PARK PA 17352

SUMMER LEDFORD  
615 ALUM ROCK RD  
NEW PARK PA 17352

ADDYSON CREAMERS  
KATHARINE CREAMERS  
JORDYN CREAMERS  
WILLIAM CREAMERS  
54 ARNOLD RD  
NEW PARK PA 17352

NEIL AUTRY  
625 ALUM ROCK RD  
NEW PARK PA 17352

CHRISTINE CROWE  
735 JEFFERSON LN  
RED LION PA 17356

LEONARD TRAYNOR  
SANDRA TRAYNOR  
523 ALUM ROCK ROAD  
NEW PARK PA 17352

DOUGLAS ROHRER  
MARTHA ROHRER  
1728 BRIDGE ROAD  
LANCASTER PA 17602

DEBORAH MACKLIN  
ANDREW MACKLIN  
MACKLIN FARMS  
518 GOOD ROAD  
AIRVILLE PA 17302

HUGH MCPHERSON  
2885 NEW PARK ROAD  
NEW PARK PA 17352

J LAMAR ROHRER  
KIRA D ROHRER  
1110 VILLAGE ROAD  
LANCASTER PA 17602

LYNDA MANNING  
121 SALT LAKE RD  
FAWN GROVE PA 17321

DAWN MARKUS  
LEAH MARKUS  
7641 BURKHOLDER RD  
WAYNESBORO PA 17268

THOMAS L RAMSEY  
PATRICIA COULSON  
7189 FAIRWAY DRIVE SOUTH  
FAYETTVILLE PA 17222

LAURIE DONALDSON  
241 GROVE RD  
STEWARTSTOWN PA 17363

REGINA MANCUSO  
14 SANIBEL LANE  
CHAMBERSBURG PA 17201

WILLIAM FOGAL  
ELIZABETH RENZULLI  
1838 FALCON LANE  
CHAMBERSBURG PA 17202

KATHLEEN KAUFFMAN  
2917 ADAMS DR  
CHAMBERSBURG PA 17202

LEONARD KAUFFMAN  
MARY KAUFFMAN  
4297 OLDE SCOTLAND RD  
CHAMBERSBURG PA 17202

C STEWART MCCLEAF  
WASHINGTON TOWNSHIP SUPERVISORS  
13013 WELTY ROAD  
WAYNESBORO PA 17268

VINCENT & NICOLE SERRA  
1219 MASON DIXON ROAD  
GREENCASTLE PA 17225

DANIELLE BERNECKER  
1827 WOOD DUCK DR E  
CHAMBERSBURG PA 17202

ERIC SCOTT BURKHOLDER  
315 LEEDY WAY WEST  
CHAMBERSBURG PA 17202

AARON KAUFFMAN  
MELINDA KAUFFMAN  
4220 OLD SCOTLAND RD  
CHAMBERSBURG PA 17202

WILLA WELLER KAAL  
67 SUMMER BREEZE LANE  
CHAMBERSBURG PA 17202

LUWANDA MUMMA  
693 FALLING SPRING RD  
CHAMBERSBURG PA 17202

ROBERTA SCOTT  
6239 MARSH ROAD  
WAYNESBORO PA 17268

FRANCES MCDERMOTT  
782 FRANKLIN SQUARE DRIVE  
CHAMBERSBURG PA 17201

SPENCER PHEIL  
BRECHYN CHACE  
CAITLIN RAMSEY  
6167 GREENBRIAR TERRACE  
FAYETTEVILLE PA 17222

DONALD LEHMAN  
WAYNE LEHMAN  
686 MOWER RD  
CHAMBERSBURG PA 17202

LOIS WHITE  
1406 WALKER ROAD  
CHAMBERSBURG PA 17202

CRAIG & PAGE NITTERHOUSE  
1785 FALLING SPRING RD  
CHAMBERSBURG PA 17202

COLBY & LEAH NITTERHOUSE  
2479 NEWCOMER RD  
CHAMBERSBURG PA 17202

JOSEPH & MARY ANN REBOK  
37 LINOAK RD  
CHAMBERSBURG PA 17202

MICHAEL CORDELL  
4219 ALTENWALD RD  
WAYNESBORO PA 17268

JAN & GEORGIANA HORST  
826 NEW FRANKLIN RD  
CHAMBERSBURG PA 17202

JUSTIN & SHARLA DUNLAP  
8015 HIDDEN VALLEY LN  
WAYNESBORO PA 17268

ANNE & BRENDAN FINUCANE  
2760 SPRINGVIEW DRIVE  
CHAMBERSBURG PA 17202

ALLEN & LORI RICE  
1430 HENRY LANE  
CHAMBERSBURG PA 17202



ELLEN ENGLE  
MILTON ENGLE  
5765 MANHEIM RD  
WAYNESBORO PA 17268

ALLAN STINE  
HEATHER STINE  
867 CIDER PRESS ROAD  
CHAMBERSBURG PA 17202

BONNIE BYERS  
SUZY HUGHES  
4200 DIXIE AVENUE  
CHAMBERSBURG PA 17202

LAURIE VIOZZI  
2723 NEWCOMER RD  
CHAMBERSBURG PA 17202

KENNETH LEHMAN  
1592 FAIRVIEW AVENUE  
CHAMBERSBURG PA 17202

ELLEN BLACK  
536 BRIAR LANE  
CHAMBERSBURG PA 17202

QUINCY TOWNSHIP SUPERVISORS  
7575 MENTZER GAP ROAD  
WAYNESBORO PA 17268-8946

DOREEN RICE  
FRED RICE  
3410 CHURCH RD  
CHAMBERSBURG PA 17202

KIMBERLY CALIMER  
3136 CHURCH RD  
CHAMBERSBURG PA 17202

ROBERTA LAWYER  
8617 SHEFFIELD MANOR BLVD  
WAYNESBORO PA 17268

LARRY & SUZANNE ROSS  
1175 WEBLING CIRCLE  
GREENCASTLE PA 17225

JAY FRECH  
RUTH FRECH  
5617 MANHEIM RD  
WAYNESBORO PA 17268

ROY & EMMA CORDELL  
4690 FETTERHOFF CHAPEL ROAD  
CHAMBERSBURG PA 17202

NORMA RICKER  
WALTER RICKER  
3063 NEW FRANKLIN ROAD  
CHAMBERSBURG PA 17202

MICHAEL KATZ  
6267 CROOKED STICK LANE  
FAYETTEVILLE PA 17222

WALTER PORTMANN  
146 HARVEST LANE  
CHAMBERSBURG PA 17202

FRED BYERS  
1863 COLDSMITH RD  
SHIPPENSBURG PA 17257

HAROLD & NANCY BARNES  
1511 SPRINGSIDE DRIVE EAST  
CHAMBERSBURG PA 17202

MARTHA BUHRMAN  
3453 HERTOY LANE  
FORT LOUDON PA 17224

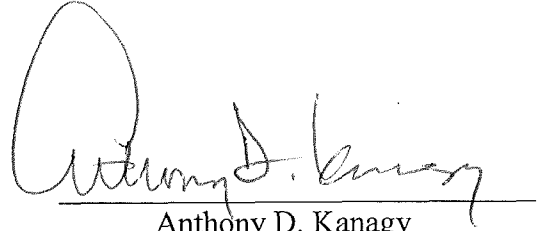
JOY BANZHOF  
709 CUMBERLAND AVENUE  
CHAMBERSBURG PA 17201

ROB MOWER  
904 WALKER ROAD  
CHAMBERSBURG PA 17202

S SUSAN MCMURTRAY  
1567 SPRING SIDE DRIVE EAST  
CHAMBERSBURG PA 17202-4718

DEBORAH SCHREIBER-OTT  
1546 SPRING SIDE DR EAST  
CHAMBERSBURG PA 17202

Date: March 8, 2018



Anthony D. Kanagy

**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 MEMORANDUM OF  
TRANSOURCE PENNSYLVANIA, LLC**

**TO ADMINISTRATIVE LAW JUDGES ELIZABETH H. BARNES AND ANDREW M. CALVELLI:**

Transource Pennsylvania, LLC (“Transource PA” or the “Company”), pursuant to 52 Pa. Code § 5.222(d), and in compliance with the Prehearing Order issued by Administrative Law Judges Elizabeth H. Barnes and Andrew M. Calvelli (the “ALJs”) on February 26, 2018, hereby files this Prehearing Memorandum in the above-captioned proceedings, and states as follows:

**I. PROCEDURAL HISTORY, PROTESTS AND PETITIONS TO INTERVENE**

1. On December 27, 2017, Transource PA filed Applications for Approval of the Siting and Construction of 230 kV Transmission Lines in Portions of York County at Docket No. A-2017-2640195 (“IEC-East Project”) and in portions of Franklin County at Docket No. A-2017-2640200 (“IEC-West Project”) (collectively, the “Independence Energy Connection Project” or “IEC Project”).

2. Notice of the Applications appeared in the *Pennsylvania Bulletin* on January 20, 2018.

3. On February 22, 2018, Transource PA filed Proofs of Publication indicating that public notice of the Application at Docket No. A-2017-2640195 appeared in the *York Daily Record* and *South York Delta Star* on January 25, 2018 and February 1, 2018. Also on February 22, 2018, Transource PA filed Proofs of Publication indicating that public notice of the Application at Docket No. A-2017-2640200 appeared in the *Waynesboro Record Herald* and the *Chambersburg Public Opinion* on January 25, 2018 and February 1, 2018.

4. The deadline for filing protests and petitions to intervene was February 20, 2018. Numerous Protests were filed in both dockets, including Protests filed by the Office of Consumer Advocate (“OCA”). Petitions to Intervene in Docket No. A-2017-2640200 (IEC-West) were filed by PECO Energy Company, Scott and Emily Crist, Stop Transource Franklin County, Mid-Atlantic Interstate Transmission, LLC & West Penn Power Company, and Jared and Rebecca Campbell. Numerous individuals, as well as PECO Energy Company, the Maryland and Pennsylvania Railroad Preservation Society, and Citizens to STOP Transource filed Petitions to Intervene in Docket No. A-2017-2640195 (IEC-East). The Office of Small Business Advocate (“OSBA”) also filed Notices of Intervention and Public Statements in both dockets.

5. A Notice of Prehearing Conference was issued on January 4, 2018, scheduling the Initial Prehearing Conference in both dockets for March 13, 2018.

6. On February 28, 2018, the ALJs issued a Prehearing Conference Order directing that the parties submit prehearing conference memoranda by March 8, 2018.

## **II. CONSOLIDATION OF CASES**

7. The Applications filed at Docket No. A-2017-2640195 and Docket No. A-2017-2640200 both relate to the IEC Project approved by PJM Interconnection, LLC to alleviate transmission congestion constraints and provide reliability benefits in Pennsylvania, Maryland, West Virginia, and Virginia. Transource PA requests the Applications be consolidated for purposes of hearings and decisions pursuant to the Pennsylvania Public Utility Commission's ("Commission") regulations at 52 Pa. Code § 5.81 because the Applications involve common questions of law and fact, and consolidating the Applications will facilitate the timely and efficient resolution of the matters raised in the Applications.

## **III. FORTHCOMING EMINENT DOMAIN AND SHELTER APPLICATIONS**

8. Transource PA is in the process of seeking to negotiate rights-of-way with the affected landowners. In the event that Transource PA is unable to acquire the rights-of-way needed for the IEC Project, Transource PA will file separate applications seeking Commission approval to exercise of the power of eminent domain to acquire rights-of-way and easements for the proposed IEC Project by May 15, 2018. Transource PA will request that they be consolidated and considered together with this Siting Application for the IEC Project.

9. As part of the IEC Project, Transource PA proposes to construct two new substations: the Furnace Run Substation to be located in York County, Pennsylvania and the Rice Substation to be located in Franklin County, Pennsylvania. The Company intends to submit a petition pursuant to 52 Pa. Code § 5.41 and 53 P.S. § 10619 for a finding that buildings to shelter control equipment are reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance. Transource also intends to file this petition by May 15, 2018. At that time, the Company will request that petition be consolidated with the Application proceeding.

**IV. PROCEDURAL SCHEDULE AND STATUTORY DEADLINE**

10. Transource PA proposes the following procedural schedule:

Filing	December 27, 2017
Prehearing Conference	March 13, 2018
Public Input Hearings and Site Visits	April 2018
Other Parties Direct Testimony	June 20, 2018
Rebuttal Testimony	August 1, 2018
Surrebuttal Testimony	August 22, 2018
Written Rejoinder	September 5, 2018
Hearings	Week of September 10-14, 2018
Main Brief	October 12, 2018
Reply Brief	November 2, 2018

11. Transource PA notes that it has sent this proposed schedule to the parties with counsel in this proceeding. This procedural schedule is necessary to accommodate construction of the IEC Project and to support an in-service date of June 1, 2020.

12. Transource PA notes that the schedule set forth above is longer than schedules set in other transmission line cases. In this case, Transource PA is proposing a Reply Brief date that is approximately 10 months after the filing date. In the *Susquehanna Roseland* proceeding, the Reply Brief date was approximately 9 months after the filing date. See Docket No. A-2009-2082562. Likewise, in the *Northeast Pocono* proceeding, the Reply Brief date was approximately 8 ½ months after the filing date. See Docket No. A-2012-2340872.

13. Transource PA notes that if the Parties cannot agree to a schedule, Transource PA supports the schedule set forth by the ALJs in the Prehearing Conference Order.

14. All dates are for in-hand delivery. The Company proposes that electronic mail for receipt and distribution of testimony and exhibits will satisfy in-hand service dates, with follow-up hard copies provided by first class mail.

**V. SERVICE OF DOCUMENTS**

15. Transource PA requests that all documents be served on:

Anthony D. Kanagy, Esq.  
Post & Schell, P.C.  
17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
Phone: 717-612-6034  
Fax: 717-731-1985  
E-mail: akanagy@postschell.com

16. Transource PA agrees to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies be served upon:

David B. MacGregor — dmacgregor@postschell.com  
Lindsay A. Berkstresser — lberkstresser@postschell.com  
Hector Garcia — hgarcia1@aep.com  
Amanda Riggs Conner — arconner@aep.com

17. Transource PA's attorneys are authorized to accept service on behalf of the Company in this proceeding. Transource PA requests that the Commission and all parties of record serve copies of all discovery requests and answers, correspondence, Commission Orders, and any other documents issued in this proceeding on its attorneys at the address and via the email addresses stated above.

**VI. DISCOVERY**

18. Discovery is ongoing. To date, numerous interrogatories have been served on Transource PA to which the Company has responded.

19. Transource PA has filed a Motion for Protective Order requesting to limit the disclosure of confidential information and highly confidential critical energy infrastructure information.

20. The Company proposes that discovery be conducted within the timeframe provided in the proposed procedural schedule and pursuant to the Commission's regulations regarding discovery, 52 Pa. Code § 5.342.

## **VII. WITNESSES AND ISSUES**

21. Transource PA has presented the following statements, in its case-in-chief, in support of the above-captioned Applications:

Transource PA St. No. 1: Peggy I. Simmons, Managing Director Transmission Asset Strategy for AEPSC – Provides an overview of the IEC Project; provides a description of Transource PA and other related entities; describes the process employed by Transource PA in developing, preparing and filing this Siting Application; explains the decision making process within Transource PA for selecting the transmission line route; explains how Transource PA will oversee the construction, operations and maintenance of the IEC Project; and provides a status on the right-of-way acquisitions.

Transource PA St. No. 2: Kamran Ali, Director of Transmission Planning for AEPSC – Explains the need for the IEC Project; describes the IEC Project selected by PJM Interconnection, L.L.C. ("PJM"); and describes the obligation of Transource PA to Complete the Project.

Transource PA St. No. 3: Paul F. McGlynn, Manager in the PJM Transmission Planning Department – Explains the PJM Process; explains the need for the IEC Project; and describes how the IEC Project was selected by PJM.

Transource PA St. No. 4: Barry A. Baker, Department Manager for Environmental Services, AECOM – Explains the environmental assessment, siting analysis, public outreach efforts, evaluation of the Alternative Routes, and selection of the Proposed Route for the new double-circuit 230 kV transmission line associated with the IEC-East Project.



Transource PA St. No. 5: Kent Herzog, Project Manager for Burns & McDonnell – Explains the design features of the IEC-East Project; describes the safety features that will be incorporated into the design of the new 230 kV transmission line.

Transource PA St. No. 6: Thomas Schaffer, Transmission Right of Way Manager for AEPSC – Explains the process used by Transource PA to attempt to acquire the rights-of-way and easements necessary for the IEC-East Project; and provides a summary of the status of negotiations with landowners.

In accordance with Section 57.74 of the Commission’s regulations, 52 Pa. § 57.74, Transource PA previously filed and served copies of these statements on all parties that received the Siting Application.

22. Transource PA reserves the right to call additional witnesses to address any issues that may arise during the course of the proceeding.

23. Transource PA will demonstrate that the siting and construction of the proposed IEC Project is necessary to resolve the market efficiency issues identified in PJM’s annual Regional Transmission Expansion Plan (“RTEP”) and to enhance the electrical strength and reliability of the transmission system by virtue of the new transmission facilities that will be part of the interconnected transmission grid. To accomplish this, Transource PA will, among other things, construct two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line; and (2) the Furnace Run-Conastone 230 kV Transmission Line.

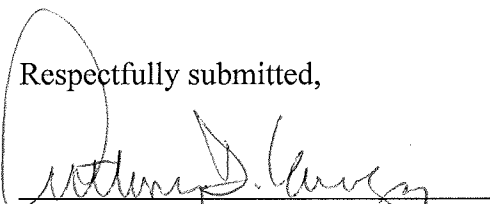
24. Transource PA will demonstrate that the proposed routes for the IEC Project were selected after extensive analysis of feasible alternatives, which included a comprehensive environmental inventory, identification and analysis of alternative routes, and selection of the preferred routes. Transource PA will demonstrate that it identified and compared route alternatives based upon a detailed analysis and balance of comments from the public, societal

concerns, environmental impacts, engineering considerations, and cost. Transource PA intends to demonstrate that, overall, the preferred routes will have substantially less impact on the natural and built environments, land use, and citizens in the affected region than alternative routes would have.

**VIII. SETTLEMENT**

25. Transource PA remains open and available for settlement discussions with the other parties and all affected landowners.

Respectfully submitted,



Amanda Riggs Conner (District of Columbia ID # 481740)  
Hector Garcia (VA ID # 48304)  
American Electric Power Service Corporation  
1 Riverside Plaza, 29th Floor  
Columbus, OH 43215  
Phone: 614-716-3410  
Fax: 614-716-1613  
E-mail: arconner@aep.com  
E-mail: hgarcia1@aep.com

David B. MacGregor (PA ID # 28804)  
Anthony D. Kanagy (PA ID # 85522)  
Lindsay A. Berkstresser (PA ID # 318370)  
Post & Schell, P.C.  
17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
Phone: 717-612-6034  
Fax: 717-731-1985  
E-mail: dmacgregor@postschell.com  
E-mail: akanagy@postschell.com  
E-mail: lberkstresser@postschell.com

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Attorneys for Transource Pennsylvania, LLC