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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

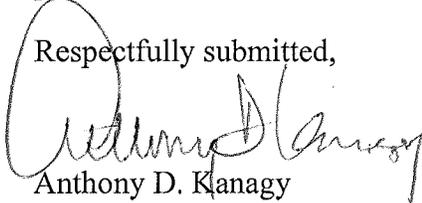
Re: Application of Transource Pennsylvania, LLC Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-East Project in Portions of York County, Pennsylvania - Docket No. A-2017-2640195

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 please find the Motion of Transource Pennsylvania, LLC for Admission *Pro Hac Vice* for Amanda Riggs Conner, Esquire, 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: Certificate of Service
Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli

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

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166 HOPEWELL ROAD
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AIRVILLE PA 17302

BEN HEISHMAN
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DANIEL MCELWAIN
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NEW PARK PA 17352

DEREK DETTINGER
24 CHANCEFORD RD
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TRISHA BOWMAN
11721 MUDDY CREEK RD
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93 KENNEDY RD
AIRVILLE PA 17302

WESTLEY TOMPKINS
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AIRVILLE PA 17302

BRETT TOMPKINS
245 ZION CHURCH RD
RED LION PA 17356

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

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JOHNEVA MICKEY
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PAMELA MOSER
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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

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YORK PA 17404

RUSSELL BURTON
8 S MAIN ST
JACOBUS PA 17407

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NEW PARK PA 17352

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JUSTINE TRAYNOR
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GARLAND SWEITZER
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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
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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
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RED LION PA 17356

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1511 SPRINGSIDE DRIVE EAST
CHAMBERSBURG PA 17202

MARTHA BUHRMAN
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FORT LOUDON PA 17224

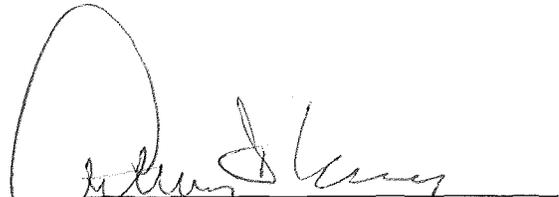
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S SUSAN MCMURTRAY
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CHAMBERSBURG PA 17202

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 :
Construction of the 230 kV Transmission : Docket No. A-2017-2640195
Line Associated with the Independence :
Energy Connection-East Project in Portions :
of Franklin 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 230 kV Transmission : Docket No. A-2017-2640200
Line Associated with the Independence :
Energy Connection-West Project in Portions :
of Franklin County, Pennsylvania :

**MOTION OF TRANSOURCE PENNSYLVANIA, LLC FOR
ADMISSION *PRO HAC VICE***

TO ADMINISTRATIVE LAW JUDGES ELIZABETH BARNES AND ANDREW CALVELLI:

Pursuant to Section 5.103 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.103, and Rule 301(b) of the Pennsylvania Bar Admission Rules, Counsel of Record for Transource Pennsylvania, LLC (“Transource PA” or the “Company”), Anthony D. Kanagy, Esq., respectfully requests that Your Honors enter an Order granting admission *pro hac vice* to Amanda Riggs Conner, Esq., as counsel for Transource PA for all purposes in relation to these proceedings (“Motion”). In support thereof, the Movant, Anthony D. Kanagy, avers as follows:

1. Pursuant to Section 1.24(b)(1) of the Commission’s regulations, 52 Pa. Code § 1.24(b)(1), the Movant has entered his appearance as counsel of record for Transource PA in

this proceeding, is an active member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 85522), and is a Principal with Post & Schell, P.C., whose principal office is in Philadelphia, Pennsylvania.

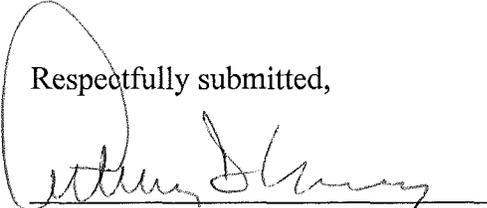
2. Amanda Riggs Conner is a Senior Counsel with American Electric Power Service Corporation, 1 Riverside Plaza, 29th Floor, Columbus, Ohio 43215.

3. Amanda Riggs Conner is a 1999 graduate of the Indiana University School of Law, Bloomington. She has been a member in good standing of the Bar of the District of Columbia since 2003.

4. Amanda Riggs Conner has experience and particular expertise in various aspects of regulatory and energy law, including issues related to electric transmission service, and has appeared in numerous proceedings before the Federal Energy Regulatory Commission. Ms. Riggs Conner has represented American Electric Power and its affiliates in energy regulatory matters for more than five years and has extensive knowledge of their operations, service activities, and regulatory history.

5. Wherefore, Anthony D. Kanagy, Movant and Counsel of Record for Transource PA, respectfully moves for admission of Amanda Riggs Conner, *pro hac vice*, on behalf of Transource PA for all permissible purposes in relation to these proceedings.

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
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David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
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Date: March 8, 2018

Counsel for Transource Pennsylvania, LLC

**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 230 kV Transmission Line : Docket No. A-2017-2640195
Associated with the Independence Energy :
Connection-East Project in Portions of :
Franklin County, Pennsylvania :

Application of Transource Pennsylvania, LLC :
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Construction of the 230 kV Transmission Line : Docket No. A-2017-2640200
Associated with the Independence Energy :
Connection-West Project in Portions of :
Franklin County, Pennsylvania :

**VERIFIED STATEMENT OF ANTHONY D. KANAGY,
SPONSOR OF AMANDA RIGGS CONNER, FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Anthony D. Kanagy, Esq., a member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 85522), is moving for the admission *pro hac vice* of Amanda Riggs Conner, Esq. in the above-captioned proceeding. In support of the Motion, I, the sponsor, submit this verified statement pursuant to Pa. R.C.P. 1012.1:

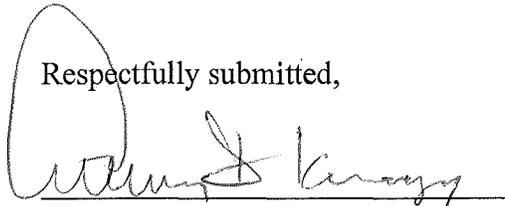
1. I have had sufficient opportunity to conduct a reasonable investigation regarding Ms. Conner and can state that she is a reputable and competent attorney.

2. Any proceeds from the settlement of a cause of action in which the candidate is granted admission *pro hac vice* shall be received, held, distributed, and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

3. I shall remain the attorney of record in this case, as required by the Rules of Civil Procedure.

4. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information, and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

Respectfully submitted,



Anthony D Kanagy (PA ID # 85522)

Post & Schell, P.C.

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Date: March 8, 2018

**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 :
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Associated with the Independence Energy :
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Franklin County, Pennsylvania :

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Construction of the 230 kV Transmission Line : Docket No. A-2017-2640200
Associated with the Independence Energy :
Connection-West Project in Portions of :
Franklin County, Pennsylvania :

**VERIFIED STATEMENT OF AMANDA RIGGS CONNER
FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Anthony D. Kanagy, Esq., a member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 85522), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of the said sponsor's Motion, I, the candidate, submit this verified statement pursuant to Pa. R.C.P. 1012.1:

1. I am admitted to practice in and am a member of good standing in the Bar of the District of Columbia, having been admitted in 2003. I have never been suspended, disbarred, or otherwise disciplined nor am I currently the subject of any disciplinary proceeding.

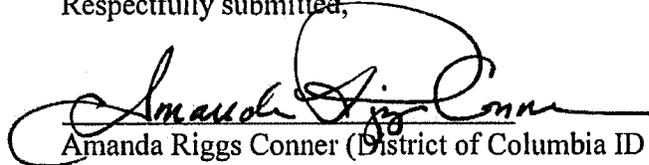
2. I shall comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

3. I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during my appearance in the matter for which admission *pro hac vice* is being sought.

4. I consent to the appointment of the sponsoring attorney, Anthony D. Kanagy, Esq., as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in the matter for which admission *pro hac vice* is sought.

5. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information, and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

Respectfully submitted,



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Date: March 8, 2018