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E-File

March 9, 2018

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17120-3265

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 on behalf of PPL Electric Utilities Corporation ("PPL Electric") is a Nunc Pro Tunc Petition to Intervene in the above referenced consolidated proceedings.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on March 9, 2018, which is the date it was filed electronically using the Commission's E-filing system.

If you have any questions please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Amy E. Hirakis", is written over the typed name. The signature is fluid and cursive.

Amy E. Hirakis

Enclosure

Cc: Certificate of Service
ALJ Barnes
ALJ Calvelli

CERTIFICATE OF SERVICE

(Docket Nos. A-2017-2640195 and 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).

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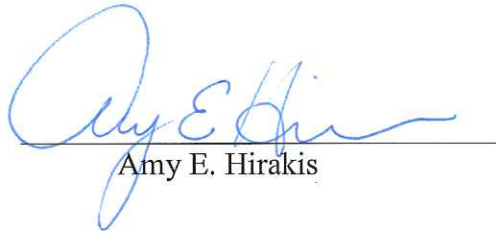
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Date: March 9, 2018



Amy E. Hirakis

**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 :**

**NUNC PRO TUNC PETITION TO INTERVENE OF
PPL ELECTRIC UTILITIES CORPORATION**

Pursuant to 52 Pa.Code §§ 5.72-74, PPL Electric Utilities Corporation (“PPL Electric”) files this *Nunc Pro Tunc* Petition to Intervene in the above-captioned proceedings. In support of this Petition, PPL Electric states as follows:

I. INTRODUCTION

1. PPL Electric furnishes electric service to approximately 1.4 million customers throughout the certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania. PPL Electric is a “public utility” and an “electric distribution company” as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 102, 2803.

2. 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 Independent Energy Connection Project in portions of York and Franklin Counties, Pennsylvania (“Application”).¹

3. In its Application, 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 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 Line”) and the Rice-Ringgold line (the “IEC-West Line”). *Id.* at 1-2.

4. The Commission will evaluate Transource’s Application under Sections 501 and 1501 of the Public Utility Code, as well as its Regulations at 52 Pa. Code Section 57.71 *et seq.* The Commission’s regulations state that it will not grant a siting application unless it finds that: (1) there is a need for it; (2) it will not create an unreasonable risk of danger to the health and safety of the public; (3) it is in compliance with applicable statutes and regulations providing for the protection of the natural resource of this Commonwealth; and (4) it will have minimum adverse environmental impact, considering the electric power needs of the public, the state of available technology, and the available alternatives. 52 Pa. Code § 57.76.

¹ Transource has requested that the two Siting Applications at Docket Nos. A-2017-2640195 and A-2017-2640200 be consolidated for the purpose of hearings and decisions. Application at 2.

5. The Commission will also consider: (1) the present and future necessity of the proposed HV line in furnishing service to the public; (2) the safety of the proposed HV line; (3) the impact and the efforts which have been, and will be, made to minimize the impact, if any, of the proposed HV line upon land use, soil sedimentation, plant and wildlife habitats, terrain, hydrology, landscape, archeologic areas, geologic areas, historic areas, scenic areas, wilderness areas, and scenic rivers; and (4) the availability of reasonable alternative routes. 52 Pa Code § 57.75; see also 52 Pa. Code § 69.3105.

II. ELIGIBILITY TO INTERVENE

6. The Commission's Regulations at 52 Pa. Code § 5.72 permits a petition to intervene to be filed by any "person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought." 52 Pa. Code § 5.72(a). A party is eligible to intervene under this section upon showing "an interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." *Id.* at § 5.72(a)(2).

7. Transource's proposed route for the Furnace Run-Conastone line is what is commonly referred to as a "greenfield" route. That is, Transource needs to acquire new easements over property in York County and build an entirely new HV line.

8. Transource's application has raised concerns in the local community relating to the impacts it will have on the local area, including but not limited to concerns about impact on animal and plant habitats; impacts on agricultural land; impacts on soils; impacts on wetlands and floodplains; and storm water impacts. See, e.g., Protest of the York County Planning Commission, ¶¶ 12, 14.

9. PPL Electric has recently been contacted by a local legislator inquiring whether PPL Electric has existing right of way in which the IEC-East Line could be constructed in order to reduce the impact on the environment and the local community. In response to this inquiry, PPL Electric investigated the matter and recognized that it indeed has existing right of way on its Otter Creek-Conastone line which substantially parallels the proposed IEC-East Line. PPL Electric has now learned that this fact was publicized in an article in the York Daily Record on December 15, 2017.

10. Further, Transource has identified land owned by PPL Electric as potentially within the right-of-way of its proposed route. See Application; Attachment 5 (List of land owners of property within the right-of-way).

11. Accordingly, PPL Electric has a direct and substantial interest in the issues raised in this proceeding because (1) Transource has identified land owned by PPL Electric as potentially within the right-of-way of its proposed route; and (2) due to the proximity of PPL Electric's Otter Creek-Conastone line, which parallels and is in close proximity to the proposed IEC-East Line, there is great potential that PPL Electric's Otter Creek-Conastone line and/or its existing right of way will become an issue in this proceeding. Hence, PPL Electric seeks to intervene in this proceeding in order to protect its property interests and monitor the impacts of Transource's proposal on PPL Electric's facilities.

III. GOOD CAUSE TO FILE THIS PETITION NUNC PRO TUNC

12. The Commission's regulations at 52 Pa. Code § 5.74(b) sets forth the permitted time frame for a party to timely file a petition to intervene. See 52 Pa. Code § 5.74(b)(1)-(4). Accordingly, in this matter, a petition to intervene was to be filed no later than February 20, 2018 to be timely.

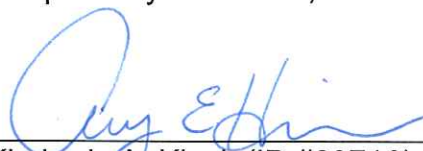
13. Section 5.74(b), however, provides the opportunity to file a petition to intervene after the established time period for good cause shown. See 52 Pa. Code § 5.74(b)(1)-(2).

14. PPL Electric has good cause to file this petition *nunc pro tunc*. PPL Electric was contacted by a local state legislature after the February 20, 2018 date to file petitions to intervene. It was this outreach to PPL Electric by a state legislature inquiring about its existing right of way that alerted PPL Electric that its Otter Creek-Conastone line could be a potential issue in this proceeding.

15. Further, allowing PPL Electric to intervene in a matter in which there are numerous other objectors will not delay the proceeding, nor will not change Transource's burden of proof.

16. For these reasons, PPL respectfully requests that the Commission grant this Petition to Intervene *nunc pro tunc*.

Respectfully submitted,



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Date: March 9, 2018

Counsel for PPL Electric Utilities Corporation

VERIFICATION

I, FRANK J. RICHARDSON II, being the PJM & Federal Regulatory Policy Manager at PPL Electric Utilities Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 3/9/2018

Frank J. Richardson II