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File #: 166570

May 15, 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: Petition of Transource Pennsylvania, LLC for a Finding that a Building to Shelter Control Equipment at the Rice Substation in Franklin County, Pennsylvania is Reasonably Necessary for the Convenience or Welfare of the Public**  
**Docket No. P-2018-**

Dear Secretary Chiavetta:

Enclosed for filing is the Petition of Transource Pennsylvania, LLC in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in cursive script that reads 'Anthony D. Kanagy'. The signature is written in black ink and is positioned above the printed name.

Anthony D. Kanagy

ADK/jl  
Enclosures

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

**CERTIFICATE OF SERVICE**

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 CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265

Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923

Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101

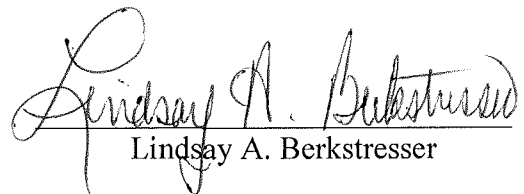
Franklin County Planning Commission  
218 North Second Street  
Chambersburg, PA 17201  
Attn: Phil Tarquino, Director

Franklin County Commissioners  
14 North Main Street  
Chambersburg, PA 17201  
Attn: David Keller, Chairman

Southampton Township  
Board of Supervisors  
705 Municipal Drive  
Shippensburg, PA 17257  
Attn: Mr. Paul Witter, Chairman

Southampton Township  
Planning Commission  
705 Municipal Drive  
Shippensburg, PA 17257  
Attn: Dr. Jack Benhart, Chairman

Date: May 15, 2018

  
Lindsay A. Berkstresser

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Transource Pennsylvania, LLC :  
for a Finding that a Building to Shelter :  
Control Equipment at the Rice Substation in : Docket No. P-2018-\_\_\_\_\_  
Franklin County, Pennsylvania is :  
Reasonably Necessary for the Convenience :  
or Welfare of the Public :

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**PETITION OF TRANSOURCE PENNSYLVANIA, LLC**

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TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) hereby petitions the Pennsylvania Public Utility Commission (“Commission”), pursuant to 52 Pa. Code § 5.41 and 53 P.S. § 10619, for a finding that a building to shelter control equipment (“Control Equipment Building”) at the proposed Rice Substation in Franklin County, Pennsylvania is reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance (“Zoning Petition”). Subject to the Commission’s approval, construction of this Project is scheduled to begin as soon as practicable to meet the in-service date of June 1, 2020. In support of this Zoning Petition, Transource PA states as follows:

**I. INTRODUCTION**

1. This Zoning Petition is filed by Transource PA, a public utility that was formed to construct, own, operate, and maintain electric transmission facilities and equipment in Pennsylvania subject to the regulatory jurisdiction of the Commission.

2. Transource PA is a limited liability company organized and existing under the laws of Delaware. Transource PA is a wholly-owned direct subsidiary of Transource Energy, LLC (“Transource Energy”).

3. Transource PA’s address is as follows:

Transource Pennsylvania, LLC  
1 Riverside Plaza, 29<sup>th</sup> Floor  
Columbus, Ohio 43215-2372

4. Transource PA’s attorneys are:

David B. MacGregor (PA ID # 28804)  
Anthony D Kanagy (PA ID # 85522)  
Lindsay A. Berkstresser (PA ID # 318370)  
Post & Schell, P.C.  
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Amanda Riggs Conner (DC ID # 481740)  
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Transource PA’s attorneys are authorized to receive all notices and communications regarding this Zoning Petition.

5. On December 27, 2017, Transource PA filed the “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” (“Siting Application”). Therein, Transource PA is requesting approval to site and construct the transmission lines associated with the West portion of the Independence Energy Connection Project (“IEC Project”). Also on December 27, 2017, Transource PA filed the “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.” The IEC Project was approved by PJM Interconnection, L.L.C. (“PJM”) to alleviate transmission congestion constraints and provide reliability benefits in Pennsylvania, Maryland, West Virginia, and Virginia. The IEC Project will have two components—the IEC-West Project, which consists of the siting and construction of the Rice-Ringgold 230 kV Transmission Line in portions of Franklin County, Pennsylvania, and the IEC-East Project, which consists of the siting and construction of the Pennsylvania portion of the Furnace Run-Conastone 230 kV Transmission Line in portions of York County, Pennsylvania.

6. With the Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC-West Project.

7. 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.<sup>1</sup>

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<sup>1</sup> Transource PA is filing separate zoning petitions for the Furnace Run Substation to be located in York County, Pennsylvania and the Rice Substation to be located in Franklin County, Pennsylvania, requesting findings that the buildings to shelter control equipment at each of the Substations are reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance pursuant to 53 P.S. § 10619.

8. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

### **III. NEED FOR THE PROJECT**

9. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

10. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). The RTEP is an annual planning process that encompasses a comprehensive series of detailed analyses to ensure electric power continues to flow reliably to customers under stringent reliability planning criteria.

11. In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies. The electric transmission needs identified in this analysis stem from the fact that the PJM transmission grid provides the means for generators to participate in a competitive wholesale market to supply electricity, both capacity and energy, to customers in PJM’s geographic footprint no matter where in this area the electrical load is located.

12. The electric transmission infrastructure needs identified by the PJM Market Efficiency Analysis are addressed by market efficiency transmission projects, which are aimed specifically at improving electric transmission economic efficiencies and alleviating electric transmission constraints that have an economic impact on PJM's wholesale energy or capacity markets.

13. When PJM's Market Efficiency Analysis identifies a need to relieve congestion on electric transmission facilities, PJM opens a Long Term Proposal Window to solicit the submittal of potential solutions (i.e., market efficiency projects) to address those needs. PJM's solicitation of market efficiency project submittals through its Long Term Proposal Window is a competitive process consistent with FERC Order No. 1000. Potential solutions are evaluated using two criteria: first, the project must address the congestion identified in the Market Efficiency Analysis; and, second, the project benefits must exceed the costs by at least 25 percent. In addition, the project must meet PJM's congestion criteria and not create additional unacceptable congestion elsewhere on the system.

14. Market efficiency projects that are selected through PJM's Long Term Proposal Window are presented to stakeholders and recommended to the PJM Board of Managers ("PJM Board") for approval. If approved, such market efficiency projects are included in the RTEP as Baseline Projects.

15. Importantly, pursuant to Schedule 6 of PJM's Amended and Restated Operating Agreement, after the PJM Board approves a proposed market efficiency project, the successful project proponent is obligated to complete the project once PJM and the successful entity execute a Designated Entity Agreement, which specifically designates the entity or entities having construction responsibility for the project.

16. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response, Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

17. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

18. Although the primary benefits from the IEC Project relate to market efficiency and the reduction of congestion costs, the new transmission facilities associated with the IEC Project will also enhance the electrical strength and reliability of the transmission system by virtue of the new transmission facilities in the area that will be part of the interconnected transmission grid. The IEC Project will provide additional and alternative paths for electricity in the event of outages on other Pennsylvania transmission facilities. The IEC Project will also allow the interconnection of future reliability, generation, and load projects in the area.

19. Pertinent to this Application, the IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the



IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

#### **IV. THE PROPOSED PROJECT**

20. The IEC Project is being proposed in order resolve the transmission congestion constraints and improve overall system reliability as described above. The IEC Project approved by PJM involves: (i) construction of two new substations in Pennsylvania, the Rice Substation and the Furnace Run Substation; and (ii) construction of two new overhead double-circuit 230 kV interstate transmission lines, the Rice-Ringgold 230 kV Transmission Line and the Furnace Run-Conastone 230 kV Transmission Line.

21. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 miles, connecting the existing Ringgold Substation located near Smithsburg, Washington County, Maryland, and the new Rice Substation to be located in Franklin County, Pennsylvania. This transmission line project is referred to as the IEC-West Project and is the subject of this Siting Application.

22. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation. Transource PA will construct, own, operate, and maintain the Pennsylvania portion of the Rice-Ringgold 230 kV Transmission Line, and Transource MD will construct, own, operate, and maintain the Maryland portion of the line.

23. A map of the proposed IEC-West Project is provided in Attachment 2 to the Siting Application.

24. The Pennsylvania portion of the new IEC-West Project will require the installation of approximately 162 structures with an average height of 135 feet. Approximately 2 to 4 taller structures (up to approximately 250 feet) may be used in certain locations to maintain appropriate clearances for certain structures and existing utility facilities. The spans between the structures will be approximately 800 feet.

25. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures. In certain areas, steel lattice structure may be used to better accommodate topographical, construction, or land use constraints. Depictions of typical structures to be used for the IEC-West Project are provided in Attachment 4 to the Siting Application.

26. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The 230 kV double-circuit design will utilize twelve power conductors, with two conductors used for each of the six phase positions, and two overhead ground wires. An engineering description of the conductors and overhead ground wires is provided in Attachment 4 to the Siting Application.

27. Provided as "Appendix A" hereto is an exhibit showing the location of the tract of land on which the proposed Rice Substation, together with the Control Equipment Building, will be constructed.

**V. EXEMPTION FROM LOCAL ZONING**

28. The Pennsylvania Municipalities Planning Code ("MPC") provides, in relevant part, as follows:

This article shall not apply to any existing or proposed building, or extension thereof, used or to be used by a public utility corporation, if, upon petition of the corporation, the Pennsylvania Public Utility Commission shall, after public hearing, decide that

the present or proposed situation of the building in question is reasonably necessary for the convenience or welfare of the public.

Section 619 of the MPC, Act of July 31, 1968, P.L. 805, *as amended*, 53 P.S. § 10619. Thus, a municipality may zone a public utility building unless the Commission determines that the building is reasonably necessary for the convenience or welfare of the public. If the Commission finds that the building is reasonably necessary, the building is exempt from local zoning ordinances under the MPC. *Del-AWARE Unlimited, Inc. v. Pa. P.U.C.*, 513 A.2d 593, 596 (Pa. Cmwlth. 1986).

29. As explained above, and more fully in the Siting Application and supporting Attachments, the IEC-West Project, including the Rice Substation, is necessary to relieve congestion constraints identified by PJM and enhance overall system reliability. The Rice Substation must include certain equipment in order to operate properly and this equipment must be protected from the elements. The most efficient and appropriate means of protecting the equipment at this Substation is construction of a Control Equipment Building on the site proposed for the new Rice Substation.

30. Because the IEC-West Project, including the Rice Substation, is reasonably necessary for the public convenience and welfare, the Commission should find that the Control Equipment Building is reasonably necessary and, therefore, exempt from the Southampton Township's local zoning ordinance pursuant to Section 619 of the MPC. *Del-AWARE Unlimited, Inc. v. Pa. P.U.C.*, 513 A.2d 593 (Pa. Cmwlth. 1986).

## **VI. THE SOUTHAMPTON TOWNSHIP ZONING ORDINANCE**

31. On January 11, 2001, the Commission adopted a policy statement to further the Commonwealth's goal of making agency actions consistent with sound land use planning by considering the impact of its decision upon local comprehensive plans and zoning ordinances.

See 31 Pa. Bull. 951 (Feb. 17, 2001). Section 69.1101 of the Commission's Regulations provides:

[T]he Commission will consider the impact of its decisions upon local comprehensive plans and zoning ordinances. This will include reviewing applications for:

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(2) Siting electric transmission lines.

(3) Siting a public utility "building" under section 619 of the Municipalities Planning Code (53 P.S. § 10619)....

52 Pa. Code § 69.1101.

32. Southampton Township has adopted a zoning ordinance. See Southampton Township, Pennsylvania Code of Ordinances Codified through Ordinance No. 2017-003, enacted December 26, 2017 (Zoning Chapter 39).<sup>2</sup>

33. The substation site for the Rice Substation is zoned as Agricultural / Woodland Conservation (A).

34. Southampton Township's zoning ordinance defines the allowances and restrictions associated with the various zoning districts and identifies "Essential Services" as:

the erection, construction, alteration, or maintenance, by public utilities or municipal or other governmental agencies or private corporations under contract to a municipality, of gas, electrical, telephone, steam or water transmission or distribution system, and sewer and solid waste disposal systems, including buildings, enclosures, wells, pumping stations, poles, wires, mains, drains, sewers, pipes, conduits, cables, fire alarm boxes, police call boxes, traffic light signals, hydrants, sanitary landfills, incinerator waste disposal areas, and other similar equipment and accessories and services in connection therewith, reasonably necessary for the furnishing of adequate service by such public utilities or municipal or other governmental agencies or private corporations under contract to a municipality including firehouse of fire companies and emergency services

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<sup>2</sup> Available at [https://library.municode.com/pa/southampton\\_township\\_franklin\\_county/codes/code\\_of\\_ordinances?nodeId=CH39ZO](https://library.municode.com/pa/southampton_township_franklin_county/codes/code_of_ordinances?nodeId=CH39ZO).

under agreement with the municipality or for the public health or safety or general welfare.

*See id.* § 39-1300.

35. Under the Agricultural / Woodland Conservation District (A) conditional uses include public utility facilities and essential services, provided that “all buildings including accessory buildings shall not cover more than ten percent of the area of the lot”. *See id.* § 39-Part 7. On application, and after a public hearing and the receipt of recommendations by the Township and County Planning Commissions, and after all required subdivision or land development plan approvals, the Supervisors may authorize the issuance of land use permits for any of the conditional uses permitted by the zoning ordinance. *See id.* § 39-1101.

36. The Southampton Zoning Ordinance defines a “building” as any structure having a roof supported by columns or walls and intended for the shelter, housing, or enclosure of persons, animals, or chattels, and including covered porches or bay windows and chimneys. *See id.* § 39-1300. In turn, the Zoning Ordinance defines “structure” any man-made object having an ascertainable stationary location on or in land or water, whether or not affixed to the land. *See id.*

37. A building and/or zoning permit is required prior to the erection, construction, or use of any building, structure, or portion thereof. A building and/or zoning permit is also required prior to the use or change in land. *See id.* § SEC. 39-501 AND 39-502

38. The proposed control equipment building at the Rice Substation as designed will generally consist of an estimated 60ft x 16ft x 10ft tall prefabricated metal building. It will rest on a series of drilled shaft concrete foundations. The building will have an HVAC unit mounted to the side providing continuous heating and cooling. The substation and building will be surrounded by a seven-foot tall chain link fence with one additional foot of barbed wire. The

fenced area will consist of approximately 8 acres. Access within the substation will be through lock secured swing gates of similar construction as the fence.

39. Based on the foregoing, in the absence of a finding by the Commission under Section 619 of the MPC, it is unlawful under the Southampton Township Zoning Ordinance for Transource PA to commence work on and begin use of the Rice Substation and Control Equipment Building. Per the Zoning Ordinance no building or structure in any district, unless otherwise exempted, shall be demolished, erected, reconstructed or restored, or structurally altered without a land use permit duly issued upon application to the Township. No land use permit shall be issued unless the proposed construction or use is in full conformity with all the provisions of this Part and the Township Land Use Permit Ordinance. Further, it is unlawful to use any structure or building in any manner until a Certificate of Zoning Compliance has been issued and obtained from the Zoning Officer.

40. For these reasons, Transource PA requests that the Commission find that the Control Equipment Building at the proposed new Rice Substation is reasonably necessary for the convenience or welfare of the public and are, therefore, exempt from the requirements of the Southampton Township Zoning Ordinance that may, in the Township's opinion, impose any restriction, condition, or regulation on the construction of the Control Equipment Building at the Rice Substation.<sup>3</sup> As explained by Mr. Ali in Transource PA St. No. 2, the IEC-West Project,

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<sup>3</sup> The lack of authority for a local municipality to regulate the design, location, or construction of public utility facilities is consistent with the long line of cases holding that public utilities are exempt from local ordinances. *See Duquesne Light Company v. Monroeville Borough*, 449 Pa. 573, 580, 298 A.2d 252, 256 (1972) ("This Court has consistently held, however, that the Public Utility Commission has exclusive regulatory jurisdiction over the implementation of public utility facilities") (citations omitted). *See, e.g., County of Chester v. Philadelphia Elec. Co.*, 420 Pa. 422, 218 A.2d 331 (1966) (holding that regulation by a multitude of jurisdictions would result in "twisted and knotted" public utilities with consequent harm to the general welfare); *Newtown Twp. v. Philadelphia Elec. Co.*, 594 A.2d 834, 837 (Pa. Cmwlth. 1991) (noting that "it is clear that no 'implied' power exists in the MPC which would allow the Township to regulate [the Philadelphia Electric Company] through its subdivision and land development ordinance"); *Heintzel v. Zoning Hearing Bd. of Millcreek Twp.*, 533 A.2d 832 (Pa. Cmwlth. 1987) (holding that township had no power to regulate, under its zoning ordinance, city's erection of water tower because

including the Rice Substation, is reasonably necessary for the convenience or welfare of the public.

41. Transource notes that it is serving copies of this Petition on the Franklin County Planning Commission, Franklin County Commissioners, Southampton Township Board of Supervisors, and Southampton Township Planning Commission.

## **VII. RELATED PROCEEDINGS**

42. As explained above, Transource PA previously filed Siting Applications with the Commission requesting approval to site and construct the IEC Project, including the proposed Rice Substation and Control Equipment Building that is the subject of this Zoning Petition. Issues relating to the necessity for the IEC Project are interrelated with this Zoning Petition.

43. Contemporaneously herewith this Zoning Petition, Transource PA is filing a Zoning Petition requesting a finding that a building to shelter control equipment at the proposed Furnace Run Substation in York County is reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance pursuant to 52 Pa. Code § 5.41 and 53 P.S. § 10619. Both the Furnace Run and Rice Substations are required for the IEC Project. Issues related to the Zoning Petition for the Furnace Run Substation are interrelated with this Zoning Petition. In addition, the Siting Applications for the IEC-East and IEC-West proceeding have been consolidated for purposes of hearing and decision.

44. Finally, Transource PA is separately filling 133 Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished

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that power was under the exclusive jurisdiction of the PUC); *South Coventry Twp. v. Philadelphia Elec. Co.*, 504 A.2d 368 (Pa. Cmwlth. 1986) (noting that to possibly subject [the Philadelphia Electric Company] to a miscellaneous collection of regulations upon its system would clearly burden and indeed disable it from successfully functioning as a utility); *Commonwealth v. Delaware and Hudson Railway Co.*, 339 A.2d 155 (Pa. Cmwlth. 1975) (holding that the MPC did not authorize local governments to regulate public utilities in any manner which infringes upon the power of the Commission to so regulate).

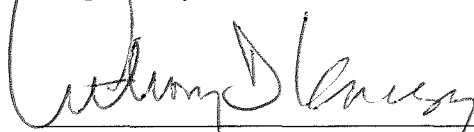
through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Zoning Petition.

45. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated for purposes of hearings, if necessary, and decision.

### **VIII. CONCLUSION**

WHEREFORE, Transource PA respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Rice Substation Zoning Petition with the IEC-East and IEC-West Siting Applications, Furnace Run Substation Zoning Petition, and the 133 Condemnation Applications contemporaneously filed herewith; and (2) find that the control equipment building proposed by Transource PA at the Rice Substation is reasonably necessary for the convenience or welfare of the public and, therefore, are exempt from the Zoning Ordinance of Southampton Township.

Respectfully submitted,



Amanda Riggs Conner (District of Columbia  
ID # 481740)  
Hector Garcia (VA ID # 48304)  
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Date: May 15, 2018

Counsel for Transource Pennsylvania, LLC



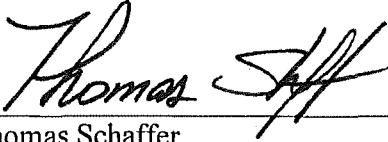
# Appendix A



**VERIFICATION**

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, 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 Transource Pennsylvania, LLC 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: May 15, 2018

  
\_\_\_\_\_  
Thomas Schaffer  
Manager, Transmission Right of Way  
Transource Pennsylvania, LLC