

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
800-684-6560

FAX (717) 783-7152
consumer@paoca.org

June 1, 2018

Honorable Elizabeth H. Barnes
Honorable Andrew M. Calvelli
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Application of Transource Pennsylvania,
LLC for Approval of the Siting and
Construction of the Independence Energy
Connection-East & West Projects in
Portions of York County & Franklin County
Docket Nos. A-2017-2640195 and
A-2017-2640200

Dear Judge Barnes and Judge Calvelli:

Enclosed please find the Office of Consumer Advocate's Motion to Amend the Procedural Schedule in the above referenced proceeding.

Copies have been served as shown on the Certificate of Service.

Respectfully Submitted,

/s/ Darryl A. Lawrence

Darryl A. Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
E-Mail: DLawrence@paoca.org

Enclosures:

cc: Rosemary Chiavetta, Secretary
Certificate of Service
*250589

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania LLC :
for Approval of the Siting and Construction :
of the 230 kV Transmission Line Associated : Docket No. A-2017-2640195
with the Independence Energy Connection - :
East Project in Portions of York County :

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

MOTION OF THE OFFICE OF CONSUMER ADVOCATE
TO AMEND THE PROCEDURAL SCHEDULE PURSUANT TO
52 PA. CODE SECTIONS 5.371, 5.372

Pursuant to 52 Pa. Code Sections 5.371 and 5.372, the Pennsylvania Office of Consumer Advocate (OCA) hereby respectfully requests that Administrative Law Judges Elizabeth H. Barnes (ALJ Barnes) and Administrative Law Judge Andrew M. Calvelli (ALJ Calvelli) amend the procedural schedule by allowing 60 additional days for the preparation of interveners Direct Testimony. In support of its Motion, the OCA sets forth the following:

I. INTRODUCTION

On December 27, 2017, Transource Pennsylvania, LLC filed two applications with the Commission seeking approval of the siting and construction of the 230 kV lines associated with the Independence Energy Connection Project. The applications are as follows:

- 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, 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, A-2017-2640200

The Independence Energy Connection Project (IEC Project), which PJM approved as part of its Market Efficiency Analysis to alleviate congestion constraints across the Pennsylvania and Maryland border, involves the construction of two new substations in Pennsylvania, the Rice Substation and the Furnace Run Substation, and the construction of the Pennsylvania Portion of two new overhead double-circuit 230 kV interstate transmission lines. The Rice substation and the Rice-Ringgold 230 kV Transmission Line is referred to as the IEC-West Project. The Furnace Run Substation and the Furnace Run-Conastone 230 kV Transmission Line is referred to as the IEC-East Project.

On January 10, 2018, the OCA filed two Protests against Transource’s Applications to build the Independence Energy Connection. The OCA has initiated an extensive review process to ensure that the Commission approves the Siting Applications only if it meets all requirements of the Public Utility Code, applicable Commission Rules and Regulations, and Pennsylvania law, as well as to protect the interest of Pennsylvania ratepayers in this proceeding. In pursuit of these ends, the issues the OCA intends to investigate include, but are not limited to:

1. The extent to which congestion exists on the AP South Reactive Interface and its effect on Pennsylvania ratepayers.
2. Whether the IEC Project is necessary and reasonable taking into consideration the costs of the project compared to the benefits it provides to Pennsylvania ratepayers.
3. Whether reasonable alternative solutions exist.

4. Whether the IEC Project meets the requirements of Pennsylvania law, the Public Utility Code and the Commission's Regulations such that the Company's Applications in this matter should be granted.

Since the start of this proceeding, it has been the OCA's intention to thoroughly analyze and investigate the Company's filing in order to provide the OCA's recommendations as to this matter and also to compile a full and complete record for the Commission's review. Significant levels of discovery are necessary in order to achieve these ends. To date, the OCA has served 18 sets of discovery. Specifically, the main bases for this Motion are the circumstances surrounding OCA Sets VI, VIII and IX.

OCA served Interrogatories Sets VI (in both the East and West proceedings) on February 6, 2018, and responses were therefore due on February 26, 2018. Set VI seeks details concerning Transource witness McGlynn's testimony regarding the estimated \$620 million savings to customers over 15 years. Transource St. 3, at 8. OCA served Interrogatories Sets VIII (in both the East and West proceedings) on February 28, 2018, and Transource responses were due on March 20, 2018. Set VIII seeks information underlying the PJM Market Efficiency Update in February 2018 and the results from reevaluation of Project 9A and 13 other projects. On or about March 8, 2018, OCA counsel engaged in a teleconference with Company counsel as to certain concerns that the Company had as to the questions posed in Sets VI and VIII.¹

During that call on March 8, 2018, the OCA was told that much if not all of the information that the OCA was seeking in Sets VI and VIII was contained in the PROMOD model (the model).²

¹ The OCA notes that numerous conversations and a multitude of e-mails were exchanged between the OCA and the Company as to Sets VI, VIII and IX. In this Motion, the OCA seeks to provide the necessary grounds for granting of this Motion without the necessity to recount and reproduce every single exchange that has occurred. That said, should the Judges determine that additional and more detailed information is needed the OCA stands ready to provide same in whatever format is so requested.

² PROMOD is a software model used by PJM as part of its Market Efficiency analysis.

The possibility was raised that PJM might be able to provide the OCA with a copy of the model at no charge, in order for the OCA to conduct its own analyses. It was decided that the Company would re-evaluate Sets VI and Set VIII and then get back to the OCA with the level of information that could be provided. As to the model, the OCA had already ascertained that creating its own analyses using the model would be extremely time consuming, costly and also well beyond the scope of work that OCA consultants were currently being retained for.

Subsequently, on April 2, 2018, an accord was reached wherein the Company agreed to provide information as to Sets VI and VIII, although the OCA was advised that production may take *several weeks*. It was also agreed that the Company would hold a technical conference in order for OCA witnesses to directly engage with Transource/PJM witnesses in an attempt to drill down on certain areas and to hopefully streamline the discovery process. As detailed elsewhere in this Motion, responses to Sets VI and VIII took over 6 weeks to be provided. In addition, the technical conference has not yet been held.³

OCA served Interrogatories Set IX in the consolidated proceeding on March 23, 2018 and Transource responses were due on April 12, 2018. Transource served Responses to Set IX-1-3, 5-7, 10-11 on April 13; the Company submitted written objections to IX-4, 8-9 on April 2. The purpose of Set IX was to seek details regarding the topology of the AP South Reactive Interface, changes or updates to that portion of the grid since the acceptance of Project 9A, and the estimation and any updates of the congestion costs as calculated by PJM. Transource St. 3 at 24-26. In response to the Company's objections, additional conversations were held as to OCA Set IX.

³ An initial date was set for May 17, but that date was contingent on the OCA first having received the responses to OCA Sets VI and VIII. Unfortunately, that date had to be cancelled because the responses to Sets VI and VIII were not received in time. On May 31, 2018, the Company provided that the technical conference could be held on June 8 and the OCA has communicated to the Company that June 8 is acceptable.

Again, the model was discussed as a possible source of answers to at least some of the questions in OCA Set IX.⁴ After several discussions and numerous e-mails it was agreed that the OCA would accept receipt of the model in order to gain a better understanding of how the model worked and perhaps to more fully understand the initial analyses that led to PJM choosing the IEC Project. In this regard, it was agreed that Transource/PJM would (1) make the model available to OCA consultant Peter Lanzalotta at no cost, (2) the model would be provided under the current Protective Order and other reasonable conditions, (3) a webinar would be held in order to provide a high-level overview of the model and its workings, and (4) Mr. Lanzalotta and other OCA personnel would attend an in-person meeting at PJM in order to more fully understand the PROMOD Model and how it is used by PJM in analyzing the current Transource matter. That accord was reached on April 12, 2018.

As of this writing, the model has not been provided. Conditions for possible receipt of the model have been provided to the OCA which go well beyond the Protective Order in this matter and are wholly unacceptable to the OCA. Accordingly, none of the other agreements of April 12 as to a webinar or an on-site visit to PJM have occurred. The OCA continues to discuss the model issue with the Company; however, the OCA is concerned that a swift resolution⁵ at this point may not be possible.

In conclusion here, the OCA has diligently pursued discovery in this matter and has attempted to work cooperatively with the Company to that end. The OCA has voluntarily

⁴ To be clear, it was never the OCA's intention in this proceeding to gain access to the model in order to run its own analyses as to congestion levels or the details as to the IEC Project. Rather, the OCA assumed that reasonable and relevant questions pertaining to PJM's analyses of congestion levels, past and present, and the original reasons for choosing the IEC Project, and its continuing need based on current congestion levels would be answered in discovery by Mr. McGlynn, a PJM employee.

⁵ Even considering that a swift resolution could occur, the OCA is uncertain as to the parameters of the model, the details contained in the model, any "base case" that PJM might be able to supply, and most importantly, whether the model will even enable the OCA to discern the level of detail that it is seeking.

withdrawn questions, rephrased questions, provided the Company with additional time to answer discovery when reasonable requests have been made and submitted additional sets of discovery in order to draw more timely and responsive answers. That said, and even through best efforts, it is apparent at this time that the current procedural schedule will not provide the OCA an adequate and reasonable opportunity to present its case. Accordingly, for the reasons detailed herein, the OCA respectfully requests that Your Honors amend the procedural schedule by postponing the deadline for pre-served intervenor direct testimony by no less than sixty days.

II. ARGUMENT

A. Background

PJM is a Regional Transmission Organization charged by the Federal Energy Regulatory Commission (FERC) with ensuring the reliable and efficient operation of the electric transmission system that spans all or parts of thirteen states. To that end, PJM prepares an annual Regional Transmission Expansion Plan (RTEP) detailing a series of analyses to ensure reliable flow of electricity to its customers. The RTEP also includes a Market Efficiency Analysis, the sole purpose of which is to identify congestion constraints across its electrical grid that effects its economic efficiency and can increase prices on the wholesale market for certain customers.

Under its Operating Agreement, PJM can approve transmission system enhancements designed to address congestion issues so long as it meets the following criteria:

If new facilities can lower costs to customers, and benefits of the project exceeds its costs by or above a certain required ratio, then PJM has the authority to require new transmission to be built.⁶

Specifically, the relative benefits and costs of the economic-based enhancement or expansion must meet or exceed a B/C Ratio of at least 1.25:1.

⁶ Section 1.5.7(d) of Schedule 6 to the PJM Operating Agreement.

The Benefit/Cost ratio is calculated by dividing the present value of the total annual benefit for each of the first 15 years of the life of the enhancement or expansion by the present value of the total annual cost for each of the first 15 years of the life of the enhancement or expansion.

If a proposal fails to meet this threshold, PJM does not consider the project economically viable or necessary. The purpose of this threshold prevents PJM from approving a project that has net benefits of zero over a 15-year period. It is the OCA's understanding that PJM periodically updates the Base Case used to calculate the B/C Ratio of a market efficiency project, even after it approves the project, to ensure that it still meets the necessity threshold.

As part of the 2014/2015 Long Term Proposal Window, PJM solicited proposals⁷ to address congestion on the AP South Reactive Interface, a set of four 500 kV lines which originate in West Virginia and terminate in Maryland. Transource submitted its proposal, now known as the IEC Project, which PJM identified as "201415_1-9A," composed of both the IEC-East and IEC-West portions. In March 2015, during the initial stages of selecting a proposal to address AP South congestion, PJM evaluated all proposals using a 2015 Base Case and ultimately selected the IEC Project. At that time, the IEC Project had a B/C ratio of 5.07.⁸

Through re-evaluation using updated assumptions, however, the IEC Project's B/C ratio began to fall over time. On March 10, 2016, the IEC Project's B/C Ratio fell to 2.66 after PJM updated the assumptions to include the 2016 load forecast and other Board-approved projects.⁹ On

⁷ A total of 41 projects were submitted for review by PJM as part of this process. Transource St. 3 at 26. All 41 projects were transmission lines. In the final evaluation stage there were four projects, including the IEC Project, that were in possible contention for approval. The IEC Project was picked out of these four as the best available project, based on then-current data.

⁸ <http://www.pjm.com/-/media/committees-groups/committees/teac/20150813/20150813-market-efficiency-update.ashx>, slide 54.

⁹ <http://www.pjm.com/-/media/committees-groups/committees/teac/20160310/20160310-market-efficiency-update.ashx>, slide 4, 9.

September 4, 2017, the IEC Project's B/C Ratio fell to 1.30 after PJM updated the Market Efficiency Base Case assumptions for mid-2017.¹⁰

Most recently, at the February 8, 2018 TEAC meeting, PJM stated that it had since re-evaluated the IEC Project with the most recent Market Efficiency Base Case assumptions posted on January 9, 2018. It noted that the updated B/C ratio of the IEC Project was 1.32. It is the OCA's understanding that even though there were three other projects that were part of the last round for consideration to possible approval, after the IEC Project was picked these other projects were no longer considered or evaluated by PJM using updated data as it became available.

B. Legal Standard

"A party may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action...It is not ground for objection that the information sought will be inadmissible at hearing if the information is reasonably calculated to lead to the discovery of admissible evidence." 52 Pa. Code § 5.321(c); see also Pa. P.U.C. v. Equitable Gas Co., Docket No. R-860315, 1986 Pa. PUC LEXIS 110, at *22 (May 16, 1986) ("We believe that the relevancy test should be liberally applied when considering discovery requests") (Equitable 1986); Rahn et al. v. Pennsylvania-American Water Co., Docket No. C-20054919, Order Granting Motion to Compel (June 6, 2006) ("[t]he touchstone as to a discoverable matter under the Commission's Regulations is that it be relevant to the subject matter involved in the pending action, or reasonably calculated to lead to the discovery of admissible evidence, and not privileged") (Rahn). Furthermore, the Commission has consistently allowed participants wide latitude in discovery matters. Pa. P.U.C. v. The Peoples Natural Gas Company, Docket No. R-850270, 1986 Pa. PUC LEXIS 79 at *17 (August 26, 1986). "[A]ny doubts are to be resolved in

¹⁰ <http://www.pjm.com/-/media/committees-groups/committees/teac/20170914/20170914-market-efficiency-update.ashx>, slide 17.

favor of relevancy and permitting discovery.” Pa. PUC v. Pennsylvania-American Water Co., Docket No. R-2011-2232243, 2011 Pa. PUC LEXIS 1523, at *18 (July 21, 2011).

The Commission’s regulations require interrogatories to be answered fully and completely. 52 Pa. Code § 5.342(a)(4). “There is no justification for the Company’s failure to provide complete information in a timely manner.” Pa. P.U.C. v. Total Env’tl. Solutions, Inc., R-00072493, 2008 Pa. PUC LEXIS 1227, at *79 (July 30, 2008) (where the company failed to provide requested information during discovery, but supplied it four months later in rebuttal testimony). In another case, the Commission ordered the ALJ to ensure that reasonable interrogatories received complete and timely answers, where the record contained allegations of late and incomplete responses. Pa. P.U.C. v. Equitable Gas Co., R-860315, 1986 Pa. PUC LEXIS 75, at *134, *135 (August 29, 1986); see also Equitable Gas Co., I-860023, 1988 Pa. PUC LEXIS 535, at *57 (Dec. 15, 1988) (“We cannot condone [the company’s] failure to provide complete and timely responses to interrogatories”).

In the instant case, the issues are complex and require intensive analysis. To effect a full investigation and present a complete case in the interest of Pennsylvania’s ratepayers, the OCA requires timely responses to its discovery requests. As set forth below, full and complete responses have not been forthcoming from Transource in a timely manner. This scenario amply justifies an Order to amend the existing procedural schedule by at least 60 days to allow the OCA a sufficient and reasonable opportunity to develop its case.

C. Unreasonably Delayed Discovery Responses

In investigating these issues, the OCA has served eighteen sets of interrogatories to date. For most of the interrogatories at issue here, Transource has interposed no written objections.¹¹ Very recently, the Company has supplied responses to some of the outstanding discovery.¹²

Specifically as to recent discovery, on Tuesday, May 22, OCA counsel sent an e-mail to ALJs Barnes and Calvelli and the other Parties requesting an informal conference call with the ALJs to discuss serious concerns as to OCA discovery. On Wednesday morning, May 23, the OCA received word that a conference call¹³ would be held on Friday, May 25 at 10 am. Subsequent to this notice the OCA received the following:

- Late in the day on May 23 the Company submitted responses to OCA Set XIII, questions 1, 2, 6 and 7. Set XIII was served on April 12 and due on May 2. These responses were 21 days overdue.
- On May 24, the Company sent a CD to OCA witness Peter Lanzalotta via overnight delivery purported to contain certain responses to OCA Set XI that were classified by the Company as Critical Energy Infrastructure Information (CEII). Set XI was served on April 3 and due on April 23. This response was 32 days overdue.

¹¹ As discussed herein, however, a great deal of discussion has taken place around these Interrogatories, specifically as to Sets VI, VIII, and IX.

¹² Initially, none of the responses received from the Company included Verifications as required by the Regulations. On May 31, 2018, the Company sent e-mails with blanket Verifications for some of its witnesses. The OCA is now in the process of attempting to verify that all responses have been properly verified.

¹³ On the Friday, May 25 call OCA counsel advised the ALJs that an additional Motion may be forthcoming whereby the OCA would seek to join PJM as a Party to this proceeding. The OCA has since discussed this issue with Transource counsel and is awaiting an answer as to a possible agreement that could potentially alleviate the need for the OCA to proceed on such Motion.

- On May 24, the Company provided responses to OCA Set X, questions 1, 2, 4, 5 and 6. OCA Set X was served on March 29 and due on April 18. These responses were 37 days overdue.
- On May 24, the Company provided responses to OCA Set VI, questions 1-3. OCA Set VI was served on February 6. As discussed above, on March 8 the OCA and the Company discussed OCA Set VI, and subsequently a deal was reached, on April 2, where responses would be provided but it may take *several weeks* to compile.¹⁴ The Company took 53 days, from April 2, to respond.
- On May 24, the Company provided responses to OCA Set VIII, questions 1-4. OCA Set VIII was served on February 28, and as discussed above, was part of the agreement also involving Set VI that was reached on April 2. The Company took 53 days, from April 2, to respond.¹⁵

To be clear, the OCA has consistently checked with the Company throughout these periods of time through phone calls and e-mail messages to inquire as to when responses might be received. The OCA has also worked diligently to continue to propound discovery in areas where the initial responses to discovery that had been received were less than clear. Unfortunately, the Company's non-responsiveness on numerous fronts, and the long-overdue receipt of numerous sets of discovery has left the OCA with no reasonable alternative but to submit this Motion.

¹⁴ The OCA additionally notes that on May 15, 2018, the Company sent a CD via overnight delivery to OCA witness Mr. Lanzalotta that purported to be a response to some of OCA Set VI and VIII interrogatories. The response was labeled as CEII by the Company and was sent 43 days after the April 2 agreement as to OCA Sets VI and VIII.

¹⁵ Based on this flurry of responses from last week, the OCA currently has no overdue discovery. That said, a review of these late-arriving responses confirms that much discovery is yet to be done.

To summarize, Transource counsel first made the offer to answer some of OCA's Set VI, VII and IX interrogatories on March 22, 2018, partly through the provision of the model without expense to the OCA and without unreasonable conditions other than compliance with the Protective Order. Over sixty days later, conditions that the OCA finds wholly unacceptable are still being discussed. Without going into even more detail, suffice it to say that in many instances, responses have been promised "next week" without responses being provided. Months have passed since these discussions began. At this juncture, OCA is unsure whether the information within the model would actually serve as "full and complete" answers under the rules. As such, OCA requests that the ALJs extend the deadline for providing its intervener direct testimony by no less than 60 days.

As is evident by the above discussion, meaningful responses to the OCA's discovery have been inordinately delayed. The Commission's Rules allow for modification of procedural schedule where this is the case:

- (a) The presiding officer, when acting under Section 5.371 (relating to sanctions—general) may make one of the following:
 - (1) An order that the matters regarding which the questions were asked, the character or description of the thing or land, the contents of the paper, or other designated fact shall be taken to be established for purposes of the action in accordance with the claim of the party obtaining the order.
 - (2) An order refusing to allow the disobedient party to support or oppose designated claims or defenses, or prohibiting the party from introducing in evidence designated documents, things or testimony.
 - (3) An order striking out pleadings or parts thereof, staying further proceedings until the order is obeyed, or entering a judgment against the disobedient party or individual advising the disobedience.
 - (4) An order with regard to the failure to make discovery as is just.
- (b) In addition to the sanctions described in subsection (a), in rate proceedings, when a party fails to answer discovery requests on the date due, the presiding officer may issue an order that the hearing schedule be modified, that the deadline for the filing of other parties' written testimony be extended, or that provides other relief that will allow the other parties a sufficient and reasonable opportunity to prepare their cases.

52 Pa. Code § 5.372. While subsection (b) specifically refers to rate proceedings, subsection (a)(4) provides for the broadest discretion by presiding officers in any type of case to issue any just order to remedy the failure to respond timely to discovery, which the OCA submits in this case is to amend the schedule and allow interveners more time to prepare direct testimony.

D. Conclusion

As agreed to by the Parties at the Prehearing Conference of March 14, the response time for interrogatories is the standard 20 days as set out in the Commission's Regulations. The OCA did not seek any modifications of the standard discovery procedures in this matter as, what appeared at the time to be, a reasonable and fair procedural schedule was adopted. The OCA submits, however, that based on the facts provided herein such a schedule is no longer either fair or reasonable. The lengthy delays in providing responses as set forth herein have unreasonably set back the OCA's on-going discovery efforts in this matter. Accordingly, the OCA's request for relief here is justified and should be granted.

III. CONCLUSION

OCA Sets VI, VIII, AND IX as discussed above all seek information relevant to the present and future necessity of the IEC Project. The lengthy delays in providing responses to these discovery sets, and others, has unfairly disadvantaged the OCA as to having a sufficient and reasonable opportunity to prepare its case in this matter. For the reasons discussed above, the OCA respectfully requests that ALJ Barnes and ALJ Calvelli grant this Motion and issue an Order modifying the current procedural schedule, *i.e.*, postponing the direct testimony deadline by no less than sixty days. In the alternative, the OCA respectfully requests that the ALJs impose any such sanction as they may deem appropriate under 52 Pa. Code Section 5.372.

Respectfully Submitted,

/s/Dianne E. Dusman

Dianne E. Dusman
Senior Assistant Consumer Advocate
PA Attorney I.D. # 38308
E-Mail: Ddusman@paoca.org

Darryl A. Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
E-Mail: DLawrence@paoca.org

Phillip D. Demanchick
Assistant Consumer Advocate
PA Attorney I.D. # 324761
E-Mail: PDemanchick@paoca.org

David T. Evrard
Assistant Consumer Advocate
PA Attorney I.D. # 33870
E-Mail: DEvrard@paoca.org

Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
Dated: June 1, 2018


BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania LLC :
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with the Independence Energy Connection - :
West Project in Portions of Franklin County :

VERIFICATION

I, Darryl A. Lawrence, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect 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).



Signature



Date

CERTIFICATE OF SERVICE

Application of Transource Pennsylvania, LLC :
for Approval of the Siting and Construction of : A-2017-2640195
the Independence Energy Connection-East & : A-2017-2640200
West Projects in Portions of York County & :
Franklin County :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Motion to Amend the Procedural Schedule, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 1st day of June 2018.

SERVICE BY E-MAIL and FIRST CLASS MAIL

David B. MacGregor, Esq.
Lindsay Berkstresser, Esq.
Anthony D. Kanagy, Esq.
Post & Schell PC
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601

Amanda Riggs Conner, Esq.
Antonio Smyth, Esq.
Hector Garcia, Esq.
American Electric Power Service
1 Riverside Plaza
29th Floor
Columbus, OH 43215

Thomas J. Sniscak
Whitney E. Snyder
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101

Sharon E. Webb, Esq.
Assistant Small Business Advocate
PA Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101

Teresa K. Harrold, Esq.
Tori L. Giesler, Esq.
First Energy
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612

Kimberly A. Klock, Esq.
Amy E. Hirakis, Esq.
PPL Electric Utilities Corporation
Two North Ninth Street
Allentown, PA 18101

Linus E. Fenicle, Esq.
Reager & Adler, P.C.
2331 Market Street
Camp Hill, PA 17011

Romula L. Diaz, Jr., Esq.
Jack R. Garfinkle, Esq.
Jennedy S. Johnson, Esq.
PECO Energy Company
2301 Market Street
Philadelphia, PA 19103

Jordan B. Yeager, Esq.
Mark L. Free, Esq.
Joanna A. Waldron, Esq.
Curtain & Heefener LLP
2005 S. Easton Road
Suite 100
Doylestown, PA 18901

J. Ross McGinnis, Esq.
41 W. Main Street
Fawn Grove, PA 17321

Karen O. Maury
Ecket Seamans Chein & Mellott, LLC
213 8th Floor
Harrisburg, PA 17101

Barron Shaw
Jana Shaw
445 Salt Lake Rd
Fawn Grove, PA 17321

SERVICE BY 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

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 Waltermeyer
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 Krick
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	Laurie Donaldson 241 Grove Rd Stewartstown, PA 17363 Katherine Stewart 14 E Pennsylvania Ave Yoe, PA 17313	Dan Moser Matt Moser Pamela Moser Zac Moser 233 W Maple Lawn Rd New Park, PA 17352
Carole Long 844 Woolen Mill Road Stewartstown, PA 17363	Daniel Mcelwain 338 Marsteller Rd New Park, PA 17352	Harry Peiffer Jr 113 Dad Burnhams Rd Pine Grove, PA 17963
Christine Blouse Brenton Blouse Ian Blouse Paige Blouse 27 Godfrey Road Felton, PA 17322	Derek Dettinger 24 Chanceford Rd Brogue, PA 17309	Dale Saxman 2443 Arnold Rd Red Lion, PA 17356
Alan Yost 16154 Little Road Stewartstown, PA 17363	Robert Bowman Trisha Bowman 11721 Muddy Creek Rd Airville, PA 17302	David Saxman 2192 Craley Rd Windsor, Pa 17366
Jake Taylor 1505 Wood Bire Road Airville, PA 17302	Gregory Wilt Kristina Wilt 353 Marsteller Rd New Park, PA 17352	Melvin Saylor 516 Bull Run Rd Wrightsville, PA 17368
Raymond R Lins Rachel L Lins 1017 Orchard Road New Park, PA 17352	M Kathryn Judy Stephen Judy 93 Kennedy Rd Airville, PA 17302	Jesse Thompson 1415 Pleasant Grove Rd Red Lion, PA 17356
Jason Wolfe Stacey Wolfe 3198 New Park Road New Park, PA 17352	Westley Tompkins 360 High Rock Rd Airville, PA 17302	Jeremiah Good 2159 Bannister St York, PA 17404
Twin Good Farms Cathy Good 68 Reed Road Airville, PA 17302	Brett Tompkins 245 Zion Church Rd Red Lion, PA 17356	Russell Burton 8 S Main St Jacobus, PA 17407
Byron Jess Boyd 831 New Park Road New Park, PA 17352	Diane M Neff 586 Frosty Hill Road Airville, PA 17302	Jonathan Hash 1790 New Park Rd New Park, PA 17352 Kent Blevins 16186 W Liberty Rd Stewartstown, PA 17363
John Hamilton Carol Hamilton 562 Woolen Road Stewartstown, PA 17363	Robert Mickey Johneva Mickey 224 Leib Rd New Park, PA 17352	Kelly Musser 5267 Snyder Ln York, PA 17406
Henry Sommer Glenda Sommer 2340 New Park Road New Park, PA 17352	Thomas Krell Jr April Krell 6720 Macbeth Way Sykesville, MD 21784	Leonard Traynor II Justine Traynor 900 Hickory Hill Ln York, PA 17402
	George Treadway 2503 Crestview Dr Fallston, MD 21047	Michael Cordell 4219 Altenwald Rd Waynesboro, PA 17268

Brandy Miller 333 Tomlinson Rd Airville, PA 17302	Neil Autry 625 Alum Rock Rd New Park, PA 17352	William Fogal Elizabeth Renzulli 1838 Falcon Lane Chambersburg, PA 17202
Garland Sweitzer 531 Good Rd Airville, PA 17302	Christine Crowe 735 Jefferson Ln Red Lion, PA 17356	Kathleen Kauffman 2917 Adams Dr Chambersburg, PA 17202
William Grove 63 W Snyder Corner Rd Red Lion, PA 17356	Leonard Traynor Sandra Traynor 523 Alum Rock Road New Park, PA 17352	Leonard Kauffman Mary Kauffman 4297 Olde Scotland Rd Chambersburg, PA 17202
Blaine Ham Tony Ham 615 Slab Rd Delta, PA 17314	Douglas Rohrer Martha Rohrer 1728 Bridge Road Lancaster, PA 17602	C Stewart McCleaf Washington Township Supervisors 13013 Welty Road Waynesboro, PA 17268
Kenny Grove 278 Oakbrook Dr Felton, PA 17322	Deborah Macklin Andrew Macklin Macklin Farms 518 Good Road Airville, PA 17302	Vincent Serra Nicole Serra 1219 Mason Dixon Road Greencastle, PA 17225
Cletus Gohn Diane Gohn 737 Good Rd Airville, PA 17302	Hugh McPherson 2885 New Park Road New Park, PA 17352	Danielle Bernecker 1827 Wood Duck Dr E Chambersburg, PA 17202
Virginia Gibble Ginny Gibble 30 School House Rd Lancaster, PA 17603	J Lamar Rohrer Kira D Rohrer 1110 Village Road Lancaster, PA 17602	Eric Scott Burkholder 315 Leedy Way West Chambersburg, PA 17202
Kevin Elko 640 Bridgeton Rd Fawn Grove, PA 17321	Lynda Manning 121 Salt Lake Rd Fawn Grove, PA 17321	Aaron Kauffman Melinda Kauffman 4220 Old Scotland Rd Chambersburg, PA 17202
Todd Dorn 8352 Blue Ball Rd Stewartstown, PA 17363	Dawn Markus Leah Markus 7641 Burkholder Rd Waynesboro, PA 17268 Thomas L Ramsey Patricia Coulson 7189 Fairway Drive South Fayetteville, PA 17222	Willa Weller Kaal 67 Summer Breeze Lane Chambersburg, PA 17202
Brian McCleary 72 W Maplelawn Rd New Park, PA 17352	Laurie Donaldson 241 Grove Rd Stewartstown, PA 17363	Luwanda Mumma 693 Falling Spring Rd Chambersburg, PA 17202
Summer Ledford 615 Alum Rock Rd New Park, PA 17352	Regina Mancuso 14 Sanibel Lane Chambersburg, PA 17201	Roberta Scott 6239 Marsh Road Waynesboro, PA 17268
Addyson Creamers Katharine Creamers Jordyn Creamers William Creamers 54 Arnold Rd New Park, PA 17352		Frances McDermott 782 Franklin Square Drive Chambersburg, PA 17201

Spencer Pheil Brechyn Chace Caitlin Ramsey 6167 Greenbriar Terrace Fayetteville, PA 17222	Ellen Engle Milton Engle 5765 Manheim Rd Waynesboro, PA 17268	Michael Katz 6267 Crooked Stick Lane Fayetteville, PA 17222
Donald Lehman Wayne Lehman 686 Mower Rd Chambersburg, PA 17202	Allan Stine Heather Stine 867 Cider Press Road Chambersburg, PA 17202	Walter Portmann 146 Harvest Lane Chambersburg, PA 17202
Lois White 1406 Walker Road Chambersburg, PA 17202	Bonnie Byers Suzy Hughes 4200 Dixie Avenue Chambersburg, PA 17202	Fred Byers 1863 Coldsmith Rd Shippensburg, PA 17257
Craig Nitterhouse Page Nitterhouse 1785 Falling Spring Rd Chambersburg, PA 17202	Laurie Viozzi 2723 Newcomer Rd Chambersburg, PA 17202	Harold Barnes Nancy Barnes 1511 Springside Drive East Chambersburg, PA 17202
Colby Nitterhouse Leah Nitterhouse 2479 Newcomer Rd Chambersburg, PA 17202	Kenneth Lehman 1592 Fairview Avenue Chambersburg, PA 17202	Martha Buhrman 3453 Hertoy Lane Fort Loudon, PA 17224
Joseph Rebok Mary Ann Rebok 37 Linoak Rd Chambersburg, PA 17202	Ellen Black 536 Briar Lane Chambersburg, PA 17202	S Susan McMurtray 1567 Spring Side Drive East Chambersburg, PA 17202
Michael Cordell 4219 Altenwald Rd Waynesboro, PA 17268	Doreen Rice Fred Rice 3410 Church Rd Chambersburg, PA 17202	Rob Mower 904 Walker Road Chambersburg, PA 17202
Jan Horst Georgiana Horst 826 New Franklin Rd Chambersburg, PA 17202	Kimberly Calimer 3136 Church Rd Chambersburg, PA 17202	Joy Banzhof 709 Cumberland Avenue Chambersburg, PA 17201
Justin Dunlap Sharla Dunlap 8015 Hidden Valley Ln Waynesboro, PA 17268	Robertta Lawyer 8617 Sheffield Manor Blvd Waynesboro, PA 17268	Deborah Schreiber-Ott 1546 Spring Side Dr East Chambersburg, PA 17202
Anne Finucane Brendan Finucane 2760 Springview Drive Chambersburg, PA 17202	Jay Frech Ruth Frech 5617 Manheim Rd Waynesboro, PA 17268	Mike Martinez Jr 2725 Jeffrey Ln York, PA 17402
Allen Rice Lori Rice 1430 Henry Lane Chambersburg, PA 17202	Roy Cordell Emma Cordell 4690 Fetterhoff Chapel Road Chambersburg, PA 17202	Lynda Manning 121 Salt Lake Rd Fawn Grove, PA 17321
	Norma Ricker Walter Ricker 3063 New Franklin Road Chambersburg, PA 17202	David Hawkins Judeth Hawkins 160 Bruce Road Airville, PA 17302
		Trevor Lewis 2200 Channel Rd Pylesville, MD 21132

Amber Geiger 148 E Scarborough Fare Stewartstown, PA 17363	Margaret Williams 90 S Oak Heights Trail Delta, PA 17314	Gary Mink Steven Mink 220 Grove Rd Stewartstown, PA 17363
Mandy Welch Scott Welch 1101 Furnace Rd Airville, PA 17302	David Koons 1032 Blymire Road Dallastown, PA 17313	Colt Martin Kristyn Martin 8020 Hidden Valley Rd Waynesboro, PA 17268
Jamie Diamond Richard Diamond 13540 Trout School Rd Felton, PA 17322	Christine Rogers 256 South Camp Street Red Lion, PA 17366	Jennifer Rumbaugh 5905 Buttermilk Rd Waynesboro, PA 17268
Valerie Dorn 8358 Blue Ball Rd Stewartstown, PA 17363	Timothy Krick 13436 Pruitt Lane Princess Anne, MD 21853	Deborah Pflager 133 Myrtle Ave Waynesboro, PA 17268
Katherine Traynor Madeline Traynor 331 Laurel Dr York, PA 17406	Diana Keys Garry Keys 201 Wheeler School Road Pylesville, MD 21132	Maria Whalen Peter Whalen 12 Mccoy Ln Carlisle, PA 17105
Thomas Wheatley 615 Alum Rock Rd New Park, PA 17352	John Krick 945 Orchard Road New Park, PA 17352	Kristi Taylor 118 Goram Rd Brogue Pa 17309
T R Corcoran 335 Good Rd Airville, PA 17302	Doug McKoy 11011 Gipe Road Chanceford, PA 17322	Kira Rohrer 1110 Village Rd Lancaster, PA 17602
Jon Smeltzer 2505 Delta Rd Brogue, PA 17309	Craig Sansonetti President Maryland & Pennsylvania Railroad Preservation Society Po Box 2262 York, PA 17405	Kathleen Tompkins 1056 Muddy Creek Rd Airville, PA 17302
Bill Wilt 280 Meggon Rd Red Lion, PA 17356	David Miller Susan Miller Millers Fuel Supply Po Box 355 3068 Delta Rd Airville, PA 17302	Patrice Taylor 183 Buecker Rd Delta, PA 17314
Mac Moser 725 Fawn Grove Rd Fawn Grove, PA 17321	Jim Strack 2010 Garnet Rd York, PA 17403	Guildford Township Supervisors 115 Spring Valley Rd Chambersburg, PA 17201 Ashley Hospelhorn 8010 Hidden Valley Ln Waynesboro, PA 17268
Dean Moser 106 Deer Rd Fawn Grove, PA 17321	Linda A Dickinson 63 Downs Ave Airville, PA 17302	Ashley Hospelhorn 116 West 3 rd Street Waynesboro, PA 17268
Ann Lavin 1175 Fawn Grove Road New Park, PA 17352	Jim Hershey 49 Strawbridge Rd New Park, PA 17352	DM Farms LLC Brian Bechbill 13689 Dream Highway Newburg, PA 17240
Jennifer Clubb Joseph Clubb 4400 Battle Hill Road Brogue, PA 17309		

Cathy Prieston
263 Westover Way
Chambersburg, PA 17202

Daniel Long
6405 Nunnery Rd
Waynesboro, PA 17268

Lantz Sourbier
Laura Sourbier
64 Edgewood Cir
Chambersburg, PA 17202

Connie Hair
Michael Hair
1331 Springview Dr
Chambersburg, PA 17202

Rebecca Campbell
125 Reed Rd
Airville, PA 17302

Karen Benedict
Rodney Myer
5413 Manheim Rd
Waynesboro, PA 17268

Suzanne Randell
4324 Fetterhoff Chapel Rd
Chambersburg, PA 17202

/s/ Darryl A. Lawrence

Darryl A. Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
E-Mail: DLawrence@paoca.org

David T. Evrard
Assistant Consumer Advocate
PA Attorney I.D. # 33870
E-Mail: DEvrard@paoca.org

Phillip D. Demanchick
Assistant Consumer Advocate
PA Attorney I.D. # 324761
E-Mail: PDemanchick@paoca.org

Dianne E. Dusman
Senior Assistant Consumer Advocate
PA Attorney I.D. #38308
E-Mail: DDusman@paoca.org

Counsel for:
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Building
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
*250590