

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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June 1, 2018

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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-2018-3001878

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Darryl A. Lawrence", written over a horizontal line.

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

Attachment

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

*250650

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Transource Pennsylvania, LLC for a :
Finding that a Building to Shelter Control : Docket No. P-2018-3001878
Equipment at the Rice Substation in Franklin :
County, Pennsylvania is Reasonably Necessary :
For the Convenience or Welfare of the Public :

NOTICE OF INTERVENTION OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Darryl A. Lawrence
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Respectfully submitted,



Darryl A. Lawrence
Senior Assistant Consumer Advocate

Dated: June 1, 2018

PUBLIC STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Acting Consumer Advocate determined to file an Intervention and participate in proceedings before the Commission involving the Petition of Transource Pennsylvania, LLC (Transource or the Company)

On May 15, 2018, Transource filed its Zoning Petition with the Pennsylvania Public Utility Commission. In its Zoning Application, Transource seeks Commission approval of the siting and construction for a building to shelter control equipment (“Control Equipment Building”) at the proposed Rice Substation in Franklin County, Pennsylvania. Zoning Petition at 2. The proposed Rice Substation is part of the Independence Energy Connection Project, which was approved by PJM Interconnection, L.L.C. to address certain transmission congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia. Zoning Petition at 2.

The OCA has determined to intervene and participate in these proceedings to ensure that the “Zoning Petition” is approved only if it meets all legal requirements of the Public Utility Code, applicable Commission rules and regulations, and Pennsylvania law, as well as to ensure that the interest of Pennsylvania ratepayers are protected in this proceeding.

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CERTIFICATE OF SERVICE

Petition of Transource Pennsylvania, LLC for a :
Finding that a Building to Shelter Control : Docket No. P-2018-3001878
Equipment at the Rice Substation in Franklin :
County, Pennsylvania is Reasonably Necessary :
For the Convenience or Welfare of the Public :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate’s Notice of Intervention and Public Statement, 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 EMAIL and INTEROFFICE MAIL

The Honorable Elizabeth Barnes	Bureau of Investigation & Enforcement
The Honorable Andrew M. Calvelli	Commonwealth Keystone Building
Administrative Law Judges	400 North Street
Commonwealth Keystone Building	Harrisburg, PA 17120
400 North Street	
Harrisburg, PA 17120	

SERVICE BY E-MAIL and FIRST CLASS MAIL

David B. MacGregor, Esq.	Amanda Riggs Conner, Esq.
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17 North Second Street, 12 th Floor	1 Riverside Plaza, 29 th Floor
Harrisburg, PA 17101-1601	Columbus, OH 43215
	Sharon E. Webb, Esq.
	Assistant Small Business Advocate
	PA Office of Small Business Advocate
	300 North Second Street, Suite 202
	Harrisburg, PA 17101

SERVICE BY FIRST CLASS MAIL

Susan Byrnes, President
Walter A. Kuhl, Chairman
York County Planning Commission
28 East Market Street
York, PA 17401-1558

Kent Heffner
John Shanbarger
Chanceford Township Planning Commission
51 Muddy Creek Forks Road
Brogue, PA 17309

/s/ Darryl A. Lawrence

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