

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
for approval of the Siting and Construction of the : A-2017-2640195
230 kV Transmission Line Associated with the : A-2017-2640200
Independence Energy Connection - East and West Projects :
in portions of York and Franklin Counties, Pennsylvania. :

Petition of Transource Pennsylvania, LLC :
for a finding that a building to shelter control equipment :
at the Rice Substation in Franklin County, Pennsylvania : P-2018-3001878
is reasonably necessary for the convenience or welfare of :
the public. :

Petition of Transource Pennsylvania, LLC :
for a finding that a building to shelter control equipment :
at the Furnace Run Substation in York County, : P-2018-3001883
Pennsylvania is reasonably necessary for the convenience :
or welfare of the public. :

Application of Transource Pennsylvania, LLC :
for approval to acquire a certain portion of the lands of :
various landowners in York and Franklin Counties, :
Pennsylvania for the siting and construction of the 230 Kv : A-2018-3001881,
Transmission Line associated with the Independence Energy : *et al.*
Connection – East and West Projects as necessary or proper :
for the service, accommodation, convenience or safety of :
the public. :

**ORDER GRANTING IN PART AND DENYING IN PART
MOTION TO COMPEL**

Introduction

Initially, we note that these consolidated cases have a lengthy procedural history which will grow significantly as the cases progress towards their conclusion in these proceedings

before the Commission. Therefore, for purposes of the OCA's Motion to Compel and Transource's Answer to the Motion, we will not discuss most of the procedural history of these cases but will instead focus on the procedural history directly relevant to disposing of the Motion. We will also paraphrase the language of the Motion and Answer to the Motion as needed, and we will omit specific page citations to those submissions due to considerations of convenience and brevity.

1. Relevant procedural background

A. OCA's Motion

On December 27, 2017, Transource Pennsylvania, LLC (Transource or Company) filed two Applications with the Commission seeking approval of the siting and construction of two 230 kV transmission lines in York and Franklin Counties at Docket Nos. A-2017-2640195 and A-2017-2640200, respectively, also known as the Independence Energy Connection project (IEC Project or Project). The Project also involves the construction of two new substations in Pennsylvania, the Furnace Run Substation in York County and the Rice Substation in Franklin County. The Furnace Run Substation and the Furnace Run-Conastone 230 kV Transmission Line is referred to as the IEC-East Project. The Rice substation and the Rice-Ringgold 230 kV Transmission Line is referred to as the IEC-West Project.

On January 10, 2018, the OCA filed two Protests against Transource's Applications to build the IEC Project. Since then, according to the Motion, the OCA has initiated an extensive review process to ensure that the Commission approves the 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 interests of Pennsylvania ratepayers in this proceeding. Specifically, the OCA claims that it is investigating whether there is a need for the IEC Project pursuant to 52 Pa. Code Section 57.76(a) (1).

According to the Motion, the Company claims that the need for this project was determined by PJM Interconnection, LLC (PJM), a Regional Transmission Operator, 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. Application at 6. PJM selected this Project as part of its Market Efficiency Analysis to alleviate congestion constraints across the AP South Reactive Interface, a set of four 500 kV lines which originate in West Virginia and terminate in Maryland.¹ Application at 8-9, Transource St. 2 at 7. According to the Company, this congestion is causing higher prices for electric service in parts of the PJM region – primarily to the South and East of the Pennsylvania border. Transource St. 3 at 25.

The Motion further states that 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.²

Specifically, the relative benefits and costs of the economic-based enhancement or expansion must meet or exceed a benefit/cost ratio (B/C Ratio) of at least 1.25:1.³ 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. Transource St. 3 at 19.

The Motion also states that to perform the cost/benefit analysis, PJM utilizes a third-party software owned and licensed to PJM by ABB, a company that specializes in electrification products, robotics and motion, industrial automation, and power grids.⁴ The ABB

¹ PJM's Market Efficiency Analysis is part of its Regional Transmission Expansion Plan (RTEP) detailing a series of analyses to ensure reliable flow of electricity to its customers. Notably, the market efficiency analysis deals solely with economic considerations, not reliability concerns.

² PJM Interconnection, LLC, Amended and Restated Operating Agreement of PJM Interconnection, L.L.C., Schedule 6, Section 1.5.7(d) (Aug. 20, 2016).

³ Id.

⁴ ABB, *About ABB*, <https://new.abb.com/about> (last visited June 27, 2018).

software suite that PJM utilizes is referred to as ‘ProMod,’ which is an electric network simulation tool that “incorporates extensive details in generating unit operating characteristics, transmission grid topology and constraints, and market system operations to support economic transmission planning.”⁵ Using this information, the model provides PJM “nodal locational marginal pricing (LMP) forecasting and transmission analysis by producing algorithms that align with the decision focus of management.”⁶

The OCA states that, based on this information, it is investigating and analyzing: (1) the historic and current congestion levels of the AP South Reactive Interface; (2) whether the current level of congestion is such that measures should be taken to alleviate it; (3) whether the IEC Project is a correct and reasonable response considering what other transmission and non-transmission (non-wires) alternatives may be available, and (4) even if the IEC Project appears reasonable from a technical transmission planning perspective, is its approval consistent with the Public Utility Code, applicable Commission Rules and Regulations, Pennsylvania law and in the best interest of Pennsylvania ratepayers. These areas of inquiry are consistent with the Commission’s Order regarding Transource’s Application for a Certificate of Public Convenience.⁷

Also as stated in the Motion, the OCA’s investigation of this matter involves details as to where the alleged AP South congestion occurs, the frequency of the congestion, and the duration of the congestion. Obtaining this information is critical to the analysis being performed by OCA witnesses, as it will allow them to determine whether and what type of

⁵ ABB, *ProMod: Fundamental electric market simulation tool*, <https://new.abb.com/enterprise-software/energy-portfolio-management/market-analysis/promod> (last visited June 27, 2018).

⁶ *Id.* Locational Marginal Pricing (LMP) is the basis by which PJM calculates the cost of moving electricity from one location to another. LMP is comprised of three components, the system marginal price, which is the same across all locations, the congestion component, which varies based on constraint, and the marginal loss component.

⁷ “The Intervenor reserve all rights to challenge the need for the Independence Project when Transource PA files a Siting Application with the Commission or to challenge any other project proposed by Transource PA.” Application of Transource Pennsylvania, LLC for all of the Necessary Authority, Approvals, and Certificates of Public Convenience: (1) to Begin to Furnish and Supply Electric Transmission Service in Franklin and York Counties, Pennsylvania; (2) for Approval of Certain Affiliated Interest Agreements; and (3) for Any Other Approvals Necessary to Complete the Contemplated Transactions, A-2017-2587821, G-2017-2587822, Order at 6 (Jan. 23, 2018).

alternatives exist that may alleviate the need to build new, greenfield transmission infrastructure.⁸

According to the Motion, in pursuit of this information, the OCA, the Company, and PJM held a technical conference, lasting three hours, on June 8, 2018.⁹ The technical conference provided the OCA and its experts with information on how the ProMod software works, as well as other information on the nature of the AP South Interface congestion. On June 12, 2018, the OCA issued Set XX, a list of ten interrogatories aimed at developing formal responses to the discussion at the June 8, 2018 technical conference. The OCA requested the following information relevant to this Motion: (1) the UNT and TRN files produced from the ProMod analysis, (2) the names of the resources within the PJM footprint listed in the UNT and TRN files, and (3) a list of generators and purchased power resources that experienced an increase or decrease in generation output because of the IEC Project, along with identifying information.¹⁰ The relevant interrogatories are set forth below:

1. During the Technical Conference Call with OCA on June 8, PJM indicated that the UNT and TRN PROMOD output files provided hourly detail regarding dispatched generator output and dispatched purchases (including solar and wind generation).
 - a. Please provide the UNT files for the PJM system including Project 9A for each year PJM analyzed.
 - b. Please provide the UNT files for the PJM system without Project 9A for each year PJM analyzed.
 - c. Please provide the TRN files for the PJM system including Project 9A for each year PJM analyzed.

⁸ For example, hourly data that indicates congestion levels ramp up during peak hours of sunlight could indicate that the further deployment of solar resources in the congested areas (South and East of the Pennsylvania border) could tend to lessen or even eliminate the need for the Project. Numerous other non-wires alternatives such as increased energy efficiency or demand response could also be considered depending on the hours and duration of congestion levels.

⁹ The OCA proposed having a technical conference as a means, in part, to overcome some of the Company's objections to OCA Sets VI and VIII. It was the OCA's intention that having the OCA's consultants speak directly with Company and PJM personnel might lead to a better understanding of the IEC Project and the underlying analyses performed by PJM that led to the Project being proposed. As a further benefit, the informal exchange of information would enable the OCA to distill its discovery questions down and negate the need to continue propounding numerous sets of discovery in order to effectively drill down on important issues. In the OCA's view, the technical conference was productive and resulted in OCA Set XX.

¹⁰ Specifically, the OCA requested the location, size, and fuel type, as well as the change in megawatt (MW) output and the marginal production cost of each affected resource.

- d. Please provide the TRN files for the PJM system without Project 9A for each year PJM analyzed.
2. It is OCA's recollection of the June 8 Technical conference call that the UNT and TRN files use abbreviated "PROMOD names" to identify resources.
 - a. Please provide a list of PROMOD names correlated to actual resource names for the PJM footprint.
 - b. If there are other resources outside PJM whose dispatch changes between the "with Project 9A" and "without Project 9A" runs, please provide the "PROMOD names" correlated to the actual resource names.
3. Please compare the UNT files with and without Project 9A, and for each hour, provide:
 - a. The actual name of each unit whose output increased with the inclusion of Project 9A.
 - b. The location, size and fuel type of each unit.
 - c. The number of MWs the output of each unit increased.
 - d. The marginal production cost of each unit whose output increased with the inclusion of Project 9A.
4. Please compare the UNT files with and without Project 9A, and for each hour, provide:
 - a. The actual name of each unit whose output decreased with the inclusion of Project 9A.
 - b. The location, size and fuel type of each unit.
 - c. The number of MWs the output of each resource decreased.
 - d. The marginal production cost of each unit whose output decreased with the inclusion of Project 9A.

Also according to the Motion, on June 22, 2018, the Company served the OCA with written Objections to several questions in Set XX, specifically questions two through six. It asserted that these questions were irrelevant, burdensome, and overly broad. On June 29, 2018, however, OCA Counsel was informed by Company Counsel that they would be providing responses to all questions in Set XX on the due date, July 2. After further discussions with the Company and ALJ Barnes, the OCA was provided with a one-week extension for filing any Motion to Compel (now due on July 9) in the event that the responses to Set XX were not full, complete and responsive.

The Motion further states that on July 2, 2018, Transource served the OCA with responses to Set XX, and marked the responses to Questions 1 and 2 as being subject to Highly Confidential – CEII protection. The Company, however, did not state reasons why this

designation was necessary, nor did it seek similar protection under Pennsylvania law. Additionally, with respect to questions 3(a) and 4(a), the Company noted its previous objection, referred the OCA to the CEII files provided, and did not perform the analysis requested.¹¹

B. OCA’s assertion that Transource Has Not Affirmatively Demonstrated the Materials Requested Require Special Confidential Protections Under Federal and State Law

According to the Motion, the Company has not met the standard for properly designating those responses as CEII pursuant to 18 CFR 388.113(d)(1)(i). The OCA also asserted that the responses do not appear to meet the requirements under 35 P.S. Section 2141.3.

The OCA’s objections in this area appear to have been addressed by the Company. In Page 3 of its Answer to the Motion, the Company states that

Some of the material provided in response to Questions 1 and 2 of OCA Set XX was designated as Critical Energy Infrastructure Information (“CEII”), based on the fact that the information that those documents contain was derived from sources designated as CEII. OCA’s Motion challenges the CEII designation of this material. Upon further review, PJM has determined that the specific information provided in the responses, by itself, does not constitute CEII and that a “Confidential” designation will be sufficient to protect this information. Counsel for Transource PA communicated the same to counsel for the OCA on July 12, 2018. Transource PA plans to reserve the material with the CEII designation removed and replaced with a “Confidential” designation. In its Motion, the OCA indicated that it was not challenging a confidential designation at this juncture. OCA Motion, p. 3, fn. 17. Thus, this issue is moot.

OCA has not indicated any disagreement with the Company’s assertions in this regard. At this juncture, we will consider the issue of confidential designations to be rendered moot. Of course,

¹¹ As noted, the Company also filed written objections to Set XX, questions 5 and 6 but supplied a limited response to both on July 2. After considering that response, the OCA has decided to not seek any additional responses to questions 5 or 6 through this Motion to Compel.

should there be a problem with confidential designations going forward, OCA is free to revisit those issues with an appropriate motion.

C. OCA's assertion that the Company Must Provide Full and Complete Answers to OCA Set XX, Questions 3(a) and 4(a).

The OCA states that it requested in Questions 3(a) and 4(a) that the Company compare the UNT and TRN files, with and without the IEC Project, and provide specific information with respect to generators and purchased power resources directly affected by the IEC Project. The questions are set forth below:

3. Please compare the UNT files with and without Project 9A, and for each hour, provide:
 - a. The actual name of each unit whose output increased with the inclusion of Project 9A.

4. Please compare the UNT files with and without Project 9A, and for each hour, provide:
 - a. The actual name of each unit whose output decreased with the inclusion of Project 9A.

According to the Motion, once the information is provided, the OCA's experts will be able to more fully understand the extent of the resources affected by the AP South Reactive Interface congestion and partially relieved by the IEC Project.

The Motion notes that, in responding to questions 3(a) and 4(a), the Company noted that it objected to the questions on the basis that the request was irrelevant, overly broad and unduly burdensome. The Company, however, answered the questions by directing the OCA to the UNT and TRN files without any additional comparison by the Company. This was not what the OCA requested. The OCA asked that the Company provide a list of all generating units that experienced an increase or decrease in generation output simulated through the ProMod analysis. The OCA submits that this is a non-responsive answer and the form of the objection is improper.

According to the Motion, the analysis that the OCA requested is directly relevant to this proceeding. The OCA notes that the Company's expert and employee of PJM, Paul McGlynn, defines congestion as follows:

Congestion occurs when the least costly resources that are available to serve load in a given region cannot be dispatched because transmission facility limits constrain power flow on the system. This is particularly true in PJM where power often flows from lower-priced generating resources in western zones to load centers in the East. The lowest-priced energy is often constrained from flowing freely to those load centers. When this occurs, PJM's system operator must dispatch higher cost resources to serve load. This results in LMP differences and congestion on the system. The congestion generally increases system production costs, LMPs, and results in increased customer payments for electric energy.

Transource St. 3 at 24. The OCA also notes that Paul McGlynn explains in more detail the nature of the congestion the IEC Project attempts to resolve:

The primary goal of the proposal window was to solicit proposals to reduce congestion on the AP South Reactive Interface, which is one of the most historically congested flowgates in PJM. According to State of the Market Reports by PJM's monitoring unit, Monitoring Analytics, the congestion cost on the AP South Reactive Interface totaled approximately \$800 million from 2012 through 2016.

Transource St. 3 at 24-25. These statements set forth the necessity and basis for the IEC Project, which the OCA asserts it has a right to investigate pursuant to 52 Pa. Code Sections 57.75(e) and 57.76(a).

Given the above, OCA contends that it is critical that Transource respond fully to the questions. Doing so will allow the OCA to better determine the nature of the AP South congestion, including where the congestion is occurring, the extent of the congestion, the frequency of congestion, and the duration of congestion. Secondly, the OCA will be able to determine, based on the hourly changes in dispatch, the hours that the congestion occurs such

that OCA witnesses will be able to assess whether and what type of alternatives to the IEC Project may exist. According to OCA, the Commission has stated that such considerations are proper:

TrAILCo's first Exception is denied. The ALJs applied the appropriate statutory and regulatory standards in their consideration of this matter. In doing so, it was entirely appropriate for the ALJs to examine federal policy and national issues revolving around the transmission grid. Similarly, we find that the ALJs properly examined issues such as the potential costs of green house emissions, DSM and energy efficiency alternatives and whether the proposal was built to facilitate west-to-east transfers of generation.¹²

The OCA is requesting the inputs, outputs, and a limited analysis of data obtained from the proprietary ProMod software. The OCA believes it is entitled to such information. By way of example, ALJ Chestnut denied the OCA's Motion to Compel filed in PECO Energy Company – Gas Division's general rate proceeding concerning a proprietary model. The OCA sought to obtain the proprietary cost of service software used by the Company's expert witness. As stated by ALJ Chestnut, while not entitled to the proprietary software, the OCA is entitled to information pertaining to the program and its results:

While the cost of service study, and the process used to develop it, are appropriate subjects for discovery, there is no requirement that the actual computer program (intellectual property of a non-party) itself be provided to any party. To put it simply, OCA is entitled to conduct discovery and have questions (whether in the form of interrogatories or at a deposition) about the program and its results, but is not entitled to have the program itself provided.¹³

¹² In re: Application of Trans-Allegheny Interstate Line Company (TrAILCo) For approval: 1) for a certificate of public convenience to offer, render, furnish or supply transmission service in the Commonwealth of Pennsylvania; 2) authorization and certification to locate, construct, operate and maintain certain high-voltage electric substation facilities; 3) authority to exercise the power of eminent domain for the construction and installation of aerial electric transmission facilities along the proposed transmission line routes in Pennsylvania; 4) approval of an exemption from municipal zoning regulation with respect to the construction of buildings; and 5) approval of certain related affiliated interest arrangements, A-110172, Opinion and Order at 29 (Nov. 13, 2008); see also 52 Pa. Code §57.76(a)(4).

¹³ Pa. PUC v. PECO Energy Company – Gas Division, R-2008-2028394, Prehearing Order #1 at 5 (June 16, 2008).

OCA contends that obtaining this information is significant because the OCA does not have access to the ProMod model.¹⁴ With this analysis the OCA will be better able to understand where congestion is occurring and will be in a better position to determine whether alternatives may be a potential solution to whatever levels of congestion are actually occurring on the system. For these reasons, the OCA asserts that Set XX, Questions 3(a) and 4(a) are relevant and critical to the OCA's analysis and the OCA is entitled to such information.

The OCA submits that the information requested in its Motion to Compel is not overly broad or unduly burdensome. The OCA notes that its request in the Motion is limited to a list of resources that experienced an increase or decrease in generation output within the ProMod software because of constructing the IEC Project. Moreover, the Motion is further limited to the UNT files produced by ProMod.¹⁵ The OCA also has additional time to submit its Direct Testimony, as granted by the Third Prehearing Order, and is willing to work with the Company to establish a mutually convenient time for providing these responses.

Additionally, according to OCA, there is precedent for allowing the OCA to obtain information related to analytical data, even where the answering party perceives the request to be unduly burdensome. In the Investigation Regarding Intrastate Access Charges and IntraLATA Toll Rates of Rural Carriers and the Pennsylvania Universal Service Fund, the OCA submitted a Motion to Compel requesting data and the individual elements used by two utilities to perform an economic cost study.¹⁶ The OCA intended to use the data to formulate its own

¹⁴ The OCA negotiated with PJM to obtain a temporary license for ProMod from ABB. Both the OCA and PJM agreed, however, that there were differences on both sides that could not be bridged. Most recently, several e-mails were exchanged between the OCA, Transource and PJM over the terms that ABB was requiring the OCA and Mr. Lanzalotta to agree to in order for the OCA to have access to the PROMOD Model. On the morning of June 13, 2018, OCA Counsel received a call from Ms. Michelle Harhai from PJM as to the terms that ABB was requiring. It was mutually determined by PJM and OCA at that time that an accord as to the terms for access to PROMOD was not reasonably possible. Accordingly, it was agreed by PJM and OCA that continued efforts to provide OCA access to PROMOD should be discontinued. On that call Ms. Harhai also informed OCA Counsel that although there was an \$11,000 charge from ABB for the PROMOD license, PJM had not actually incurred that costs as the purchase order for same was put on hold by PJM until the terms were worked out.

¹⁵ The OCA will not seek through this Motion a comparison from the Company regarding resources listed in the TRN files. See pg. 7, supra.

¹⁶ I-00040105, Order Disposing of the Motions to Compel Filed by the Office of Consumer Advocate and Verizon Against the Pennsylvania Telephone Association and Embarq at 7-8 (Aug. 20, 2008).

model in order to determine whether any service was being subsidized by residential ratepayers.¹⁷ The utilities objected on the basis of burden, annoyance, and expense because the information was not maintained in the format requested and would require significant resources to obtain.¹⁸ In granting the OCA's Motion to Compel, ALJ Colwell stated:

The customer-specific information in Interrogatories 1 and 2 were characterized by the Companies as the most burdensome. As each Company is capable of and required to bill each customer for the service provided, it is reasonable to assume that each Company can identify the locations of the facilities it provides, the nature of the facilities, and other information necessary to the provision and billing of service. The Companies and OCA are directed to work together to develop the least burdensome format for the provision of the information necessary for use in the OCA's cost study.¹⁹

Similar to the above situation, the OCA requests an analysis limited to generator resources that experienced a decrease or increase in generation output because of the IEC Project. The OCA states that this information is data that is a part of the simulation that the Company is using to justify the necessity of this project. Moreover, the Company has access to the model to run such a comparison. Lastly, as stated above, the OCA is willing to work with the Company to establish a mutually convenient date and the least burdensome format for the information. Accordingly, although some effort may be required in order to produce this information, OCA does not believe it is unduly burdensome to do so, given the importance of this information.

OCA concludes its Motion by noting its concern over the Company's practice of providing responses to discovery while noting the Company's continuing objections to the same discovery questions. OCA states that on June 22, 2018, the Company initially submitted its written Objections to questions two through six of OCA Set XX. Subsequent to this, after

¹⁷ Id.

¹⁸ Id., at 10.

¹⁹ Id., at 12.

discussion with the OCA and ALJ Barnes, the Company agreed that it would provide responses to all questions in Set XX. In its responses, however, the Company once again noted its objections to Set XX, Questions two through six.

The OCA's primary concern is whether the Company's continued objection noted in its response means that the Company has not fully and completely responded to the interrogatories. As stated by ALJ Jones, this situation can cause confusion:

We also agree with OCA concerning the PAWC's General Objection 9 and its implication that the Company is objecting to every single interrogatory, even the ones to which it is filing a response. PAWC's General Objection 9 creates a situation that is highly confusing to both the Parties and the ALJs in this case. Despite PAWC's statements to the contrary, we believe that the main purpose behind the Company's General Objections is to ensure that PAWC did not waive the opportunity to object to a specific interrogatory if the necessity to object became apparent during the process of answering the said interrogatory. As mentioned above, such a tactic causes confusion on the parties conducting discovery and is highly improper.²⁰

According to the OCA, in the present situation the OCA does not know which responses are objected to and complete or objected to and incomplete. The OCA respectfully submits, therefore, that the Company cannot be allowed to object to an interrogatory and provide an answer, if it does not also indicate whether it is responding fully and completely.

D. Transource's Response to OCA's Motion

In its Answer to the Motion (Answer), Transource states that, while maintaining its objections, Transource PA responded to Questions 3(a) and 4(a) by referring the OCA to the Confidential material provided in response to Question 1 of Set XX, which contains responsive information requested. The information provided relates to the analysis presented during PJM's February 8, 2018 TEAC meeting. While these files provide only underlying data supporting the

²⁰ Pa. PUC, et al. v. Pennsylvania American Water Co., R-2011-2232243, 2011 Pa. PUC LEXIS 1523, at *12 (July 21, 2011).

analysis, these files themselves do not contain the benefit to cost ratio calculations that are the core of PJM's market efficiency analysis. In fact, even though Transource PA has provided the .UNT files with and without Project 9A to OCA, Transource PA has also highlighted to OCA that the data requested provides no meaningful information about the congested facilities and why generation units are dispatched. All that the analysis requested by OCA would demonstrate would be the dispatch patterns of individual generating units, but would provide no meaningful information about the benefits of the Project to load customers.

In its Answer, Transource contends that, with the information that Transource PA has provided to the OCA, OCA can compare the hourly files to determine which units output increased in each hour and which units output decreased in each hour. A correlation of PROMOD long names to PROMOD short names of the units has also been provided to OCA in response to OCA-VI-Id, which enables OCA to identify each of the thousands of generating units included in PROMOD and provided in the .UNT files. The information provided in these files sufficiently answers Questions 3(a) and 4(a). Therefore, the OCA can determine the information it is requesting in Questions 3(a) and 4(a) from the data that has already been provided by performing its own analysis.

Transource also states in its Answer that the Company has advised OCA that it has the information to perform its analysis in its response to Set XX. The Company also reiterates its willingness to provide technical information both about the .UNT files and PROMOD. Despite this, Transource states, it appears that OCA is moving to Compel Transource PA and/or PJM to perform this analysis for OCA. This is an unreasonable request as far as Transource is concerned.

Transource contends that responding to Questions 3(a) and 4(a) would require a new analysis that has not been performed by PJM or Transource PA. More importantly, the analyses requested are irrelevant to the issues raised in this case. The OCA maintains that the information is necessary to evaluate congestion issues, including the extent, duration and frequency of congestion. (OCA Motion p. 17). Transource states that it has already provided the information necessary for OCA to perform the analysis requested in Questions 3(a) and 4(a).

Transource further states that, even if that analysis was performed it would still not provide meaningful information about the congested facilities or the benefits of Project 9A. However, the analysis requested was not part of the evaluation of Project 9A, nor is it informative regarding the need for Project 9A.

Transource then notes that the OCA cites Pa. PUC v. PECO Energy Company - Gas Division, Docket No. R-2008-2028394, Prehearing Order #1 at 5 (June 16, 2008) and Order Disposing of the Motions to Compel Filed by the Office of Consumer Advocate and Verizon Against the Pennsylvania Telephone Association and Embarq, Docket No. 1-00040105, at 7-8 (Aug. 20, 2008) as support for its argument that the analysis requested is relevant to its examination of congestion and alternatives related to Project 9A and would not rise to the level of undue burden. Transource contends that those cases are distinguishable from the OCA's request here. In Pa. PUC v. PECO Energy Company, the OCA's request was limited to providing existing data and inputs, not conducting a new extensive analysis. The Order Disposing of the Motions to Compel Filed by the Office of Consumer Advocate and Verizon Against the Pennsylvania Telephone Association and Embarq was issued in a rate proceeding. Here, the OCA is requesting that Transource PA perform a new analysis using the data in a non-rate proceeding.

Transource also states that whether a particular generating unit's output increases or decreases in the model with or without Project 9A in a particular hour, or even month or year, provides no meaningful information about the benefits that result from bringing in service Project 9A. The model used by PJM to perform its market efficiency analysis contains thousands of individual units, and each unit may increase output in some of the hours modeled and decrease output in some other hours as a result of including or excluding Project 9A from the modeled scenarios. Given the lack of probative value of this information, and that the OCA has the information needed to perform the analysis requested on its own, it would be unduly burdensome and unreasonable to require Transource PA to perform the analysis. Moreover, while the PROMOD tool performs hourly simulations, the analysis conducted by PJM to determine the benefits of a proposal to relieve congestion is performed on data which is aggregated to an annual basis, and without comparison of individual generating units output. Comparison of the

output of individual generating units serves no purpose in evaluating the benefits of proposals, and was therefore not performed.

Transource then disagrees with the OCA's statement that the Company has access to the PROMOD model to perform this analysis (motion page 20). Transource states that OCA's statement is incorrect. The PROMOD software does not perform comparison but rather it runs simulations of the studied scenarios. As a result, the PROMOD software cannot be used to perform the analysis requested by OCA. The only way to determine which individual units increased or decreased on an hourly basis would be to perform this comparison for all units for each hour- a task that either would need to be manual or require the development of new software code (including testing and validation) for that particular purpose.

Transource then notes that there are roughly 2,300 generating units represented in the ,UNT files. There are at least 8,760 hourly data points (8,784 for one of the years on account of it being a leap year) for each unit in each .UNT file. There are four .UNT files (one for each modeled year) for each of the "with 9A" and "without 9A" scenarios. Transource then explains the following:

To illustrate, $2,300 \text{ units} \times 8,760 \text{ hours} \times 4 \text{ modeled years} = 80,592,000$ data points for each scenario which would need to be compared in order to respond to OCA's request. Performing this analysis manually is not a practical alternative. Therefore, it would require the writing of new software code, as explained above, separate from the PROMOD software. Transource PA explained this to OCA in its Objection. The OCA claims in its Motion to compel that "[i]t is critical, therefore, that Transource respond fully to these questions" arguing that "[d]oing so will allow the OCA to better determine the nature of the AP South congestion, including where the congestion is occurring, the extent of the congestion, the frequency of congestion, and the duration of congestion" and that "the OCA will be able to determine, based on the hourly changes in dispatch, the hours that the congestion occurs such that OCA witnesses will be able to assess whether and what type of alternatives to the IEC Project may exist." (OCA Motion to Compel, p. 17). This is simply not the case. The error in OCA's argument is rooted in a misunderstanding of transmission congestion resulting in increased transmission congestion costs,

and of the market efficiency analysis necessary to evaluate whether particular projects are needed and beneficial (i.e., whether the project reduces transmission congestion costs on a net basis). Unlike transmission reliability analysis, in which predictable and narrow scenarios are considered for one specific time (such as summer peak load conditions), market efficiency analysis requires consideration of the complex interactions of very many factors (many of which are economic) over a whole simulated time period, for example one year. This market efficiency analysis is performed by PJM following a state of the art process that is subject to regulation by FERC and tested extensively by stakeholders among the generation, load, regulatory, and competing developer sectors. Given the burden of performing the analysis requested by OCA and the limited probative value, it is not reasonable to require Transource PA and/or PJM to perform this analysis.

Transource further notes that, in Footnote 24 of the Motion, OCA states that OCA and PJM agreed that it was not reasonably possible to provide OCA access to PROMOD. Transource PA and PJM disagree with any suggestion that the terms offered by ABB to OCA were unreasonable. It was the OCA's decision not to accept the terms offered by ABB, which although OCA determined were not acceptable for their purposes, represented commercial terms that are typical for customized software such as PROMOD.

Transource concludes its answer by explaining its position that parties are not required to perform analyses for other parties outside of a rate proceeding. Even in a rate proceeding, the filing party is not required to perform an analysis for other party when that party can perform the analysis itself, 52 Pa. Code § 5.361. The information requested in Questions 3(a) and 4(a), even if OCA were to perform the required analysis on its own, is irrelevant to the need for Project 9A and related congestion issues. Transource PA should not be required to undertake a burdensome, irrelevant analysis, especially when OCA has the information needed to perform the analysis itself.

2. Legal Standard

Under the Commission's regulations, the scope of discovery is broad. Section 5.321 outlines the scope of discovery as follows:

(c) *Scope.* Subject to this subchapter, a party may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party, including the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of a discoverable matter. It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

52 Pa. Code § 5.321(c). Additionally, information is relevant if it tends to establish a material fact, tends to make a fact at issue more or less probable, or supports a reasonable inference or presumption regarding a material fact. Smith v. Morrison, 47 A.3d 131 (Pa. Super. 2012), app. denied, 57 A.3d 71 (Pa. 2012). Relevancy in discovery is broader than the standard used for admission of evidence at a hearing. Com. v. TAP Pharmaceutical Products, Inc., 904 A.2d 986 (Pa. Cmwlth. 2006). As stated above, the information requested must appear reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321. The party objecting to discovery has the burden to establish that the requested information is not relevant or discoverable. Koken v. One Beacon Insurance Co., 911 A.2d 1021 (Pa. Cmwlth. 2006).

3. Disposition

Although the scope of discovery is broad, there are certain significant limitations thereon, as follows:

§ 5.361. Limitation of scope of discovery and deposition.

(a) Discovery or deposition is not permitted which:

- (1) Is sought in bad faith.
- (2) Would cause unreasonable annoyance, embarrassment, oppression, burden or expense to the deponent, a person or party.
- (3) Relates to matter which is privileged.
- (4) Would require the making of an unreasonable investigation by the deponent, a party or witness.

(b) In rate proceedings, discovery is not limited under subsection (a) solely because the discovery request requires the compilation of data or information which the answering party does not maintain in the format requested, in the normal course of business, or because the discovery request requires that the answering party make a special study or analysis, if the study or analysis cannot reasonably be conducted by the party making the request.

(c) If the information requested has been previously provided, the answering party shall specify the location of the information.

52 Pa. Code § 5.361.

In its Answer to OCA's Motion, Transource contends that the restrictive language of the above Commission Regulations does not require it to make a special study or analysis, since those are only required during the discovery phase of a rate case proceeding. Transource reads the restrictive language of the above Commission Regulations to only require a special study or analysis in a rate case, since the express language of the Regulations only talks about rate proceedings in Subsection (b). 52 Pa. Code § 5.361(b). We agree with this position, for the reasons stated below.

Title 1 of the Pennsylvania Consolidated Statutes contains the rules of statutory construction that apply in all legal proceedings in the Commonwealth. Section 1924 thereof directly supports the arguments made by Transource regarding the limiting language of 52 Pa. Code § 5.361(b), as follows:

§ 1924. Construction of titles, preambles, provisos, exceptions and headings.

The title and preamble of a statute may be considered in the construction thereof. **Provisos shall be construed to limit rather than to extend the operation of the clauses to which they refer. Exceptions expressed in a statute shall be construed to exclude all others.** The headings prefixed to titles, parts, articles, chapters, sections and other divisions of a statute shall not be considered to control but may be used to aid in the construction thereof.

1 Pa.C.S. § 1924. We also note that the rules of statutory construction have been expressly applied to the Regulations of the Public Utility Commission by virtue of Title 1 of the Pennsylvania Code, as follows:

§ 1.7. Statutory Construction Act of 1972 applicable.

Section 1502(a)(2) of 1 Pa.C.S. (relating to application of part) provides that, except as otherwise provided by statute or the agency adopting the document, 1 Pa.C.S. Part V (relating to Statutory Construction Act of 1972) applies to a document codified in the *Code* except legislative, judicial and home rule charter documents, that is, except documents codified in 101 Pa. Code—365 Pa. Code.

1 Pa. Code § 1.7. Turning to the Commission’s Regulations at 52 Pa. Code § 5.361, we see that the limiting language in Subsection (b) applies only to rate proceedings. Under the applicable rules of statutory construction, the fact that the exception only mentions rate proceedings necessarily means that all other proceedings are excluded. Since the instant matter is not a rate proceeding, Transource is not compelled to undertake any independent study or analysis in response to OCA’s discovery requests pursuant to 52 Pa. Code § 5.361(b). Accordingly, the general discovery rules set forth under 52 Pa. Code § 5.361(a) apply to this matter.

Reviewing the requests and Transource’s responses, we conclude that the requests are unduly burdensome and will not be permitted. Transource notes that it would have to compile some 80 million data points and either run lengthy manual processes or develop a new computer program in order to run the simulations requested by OCA. Transource also notes that OCA could have purchased its own PROMOD license in order to undertake whatever investigations it wished. Additionally, Transource notes that OCA has been provided all relevant requested information, sufficient for OCA to independently run its own tests should it choose to undertake those extensively cumbersome tasks.

Although we deny OCA’s motion to compel further discovery responses, we are granting the motion insofar as OCA seeks clarification as to whether certain responses were complete or partial responses. According to OCA, Transource simultaneously objected to and

answered a number of OCA's requests, without specifying whether the answers provided were full and complete.

We conclude that OCA has a right to know whether or not full answers were provided in response to OCA's requests. We will therefore direct Transource to supply this information to OCA. Upon receipt of such information, OCA may make any further discovery requests or motions regarding those particular matters.

ORDER

THEREFORE,

IT IS ORDERED:

1. That the Motion of the Office of Consumer Advocate to Compel additional answers to Interrogatories Set XX, Questions 3 and 4, is hereby denied;

2. That the Motion of the Office of Consumer Advocate for clarification of Transource's prior Interrogatory answers is granted;

3. That, within ten (10) days of the date of this Order, Transource shall provide written notice to the Office of Consumer Advocate, indicating, for each Interrogatory to which Transource supplied both an objection and an answer, whether each such Interrogatory has been answered in full or in part.

4. For any Interrogatory identified pursuant to Paragraph 3 above as having been answered in part, Transource shall advise the Office of Consumer Advocate which parts of the Interrogatory have been answered, and which parts of the Interrogatory remain subject to Transource's objections;

5. That, upon receipt of the information described in Paragraphs 3 and 4 above, the Office of Consumer Advocate may file further discovery requests or motions relating to outstanding discovery requests.

Date: August 3, 2018

/s/
Elizabeth H. Barnes
Administrative Law Judge

/s/
Andrew M. Calvelli
Administrative Law Judge

A-2017-2640195 & A-2017-2640200 ET AL- APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC. FOR APPROVAL OF THE SITING AND CONSTRUCTION OF THE 230KV TRANSMISSION LINE ASSOCIATED WITH THE INDEPENDENCE ENERGY CONNECTION-EAST & WEST PROJECTS IN PORTIONS OF YORK & FRANKLIN COUNTIES.

(Combined Parties List-Revised 7/12/18)

ANTHONY D KANAGY ESQUIRE*
DAVID B MACGREGOR ESQUIRE
LINDSAY A BERKSTRESSER ESQUIRE*
POST & SCHELL PC
17TH NORTH 2ND STREET
12TH FLOOR
HARRISBURG PA 17101-1601
215.587.1197

***E-SERVICE**

Representing Transource PA, LLC.

AMANDA RIGGS CONNER ESQUIRE
HECTOR GARCIA ESQUIRE
AMERICAN ELECTRIC POWER SERVICE CORP
1 RIVERSIDE PLAZA
29TH FLOOR
COLUMBUS OH 43215
614.716.3410

Representing Transource PA, LLC.

KAREN O MOURY ESQUIRE
ECKERT SEAMANS
213 MARKET ST
HARRISBURG PA 17101
717.237.6036

E-SERVICE

*Representing Maple Lawn Farms, Inc.,
Rose Tree-Blue Mountain Hunt Club, Inc. & Citizens to
Stop Transource*

SHARON E WEBB ESQUIRE
OFFICE OF SMALL BUSINESS ADVOCATE
300 NORTH SECOND ST STE 202
HARRISBURG PA 17101
717.783.2525

E-SERVICE

JOHN L MUNSCHE ESQUIRE
FIRST ENERGY CORP
800 CABIN HILL DRIVE
GREENSBURG PA 15601
724.838.6210

ACCEPTS E-SERVICE

*Representing West Penn Power & Mid-Atlantic Interstate
Transmission, LLC*

JOANNA A WALDRON ESQUIRE
JORDAN B YEAGER ESQUIRE
MARK L FREED ESQUIRE
CURTIN & HEEFNER LLP
DOYLESTOWN COMMERCE CENTER
2005 S EASTON ROAD SUITE 100
DOYLESTOWN PA 18901
267.898.0570

STOP Transource Franklin County

TERESA HARROLD ESQUIRE
TORI L GIESLER ESQUIRE
FIRSTENERGY
2800 POTTSVILLE PIKE
PO BOX 16001
READING PA 19612-6001
610.921.6783

E-SERVICE

Representing MAIT

THOMAS J SNISCAK ESQUIRE
WHITNEY E SNYDER ESQUIRE
HAWKE MCKEON AND SNISCAK LLP
100 N TENTH STREET
HARRISBURG PA 17101
717-236-1300

E-SERVICE

Representing York County Planning Commission

JACK GARFINKLE ESQUIRE
JENNEDY S JOHNSON ESQUIRE
ROMULO L DIAZ JR ESQUIRE
PECO ENERGY COMPANY
2301 MARKET STREET
LEGAL DEPT S23-1
PHILADELPHIA PA 19103
215-841-4608 (J.G.)
215.841.4353 (J.J.)
215.841.6857 (R.D.)

E-SERVICE

Representing PECO Energy Company

PHILLIP D DEMANCHICK ESQUIRE
DAVID T EVRARD ESQUIRE
DARRYL A LAWRENCE ESQUIRE
OFFICE OF CONSUMER ADVOCATE
555 WALNUT STREET 5TH FLOOR
FORUM PLACE
HARRISBURG PA 17101
717.783.5048
E-SERVICE

AMY E HIRAKIS ESQUIRE
KIMBERLY A KLOCK ESQUIRE
PPL ELECTRIC UTILITIES
TWO NORTH NINTH ST
ALLENTOWN PA 18101
610.774.4254
E-SERVICE
Representing PPL Electric Utilities

LINUS E FENICLE ESQUIRE
REAGER & ADLER PC
2331 MARKET ST
CAMP HILL PA 17011
717.763.1383
E-SERVICE
Representing Quincy Township

THE HONORABLE SCOTT WAGNER SENATOR
SENATE BOX 203028
HARRISBURG PA 17120-3028
717.787.3817

THE HONORABLE KRISTIN PHILLIPS-HILL
PENNSYLVANIA HOUSE OF
REPRESENTATIVES
PO BOX 202093
HARRISBURG PA 17120-2093
717.783.8389

J ROSS MCGINNIS ESQUIRE
41 WEST MAIN STREET
FAWN GROVE PA 17321

JOHN L KENNEDY
LOUISE S KENNEDY
490 KENNEDY ROAD
AIRVILLE PA 17302

STEPHEN SNELL
544 CRESTWOOD DRIVE
RED LION PA 17356
717.683.3528

JERRY TAYLOR
PATRICE TAYLOR
183 BUECKER RD
DELTA PA 17314

MELANIE GOSS
GREGORY GOSS
289 LEIB ROAD
NEWPARK PA 17352

SHANE TAYLOR
KRISTI TAYLOR
118 GORAM RD
BROGUE PA 17309

BARBARA GALLAGHER
FRANCIS & MARY EILEEN BOONE
9 SCARBOROUGH FARE
STEWARTSTOWN PA 17363
717.870.2054

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

GREG ANDERSON
6038 TANNER LANE
STEWARTSTOWN PA 17363

MARGARET TAYLOR
109 NORRIS ROAD
DELTA PA 17314

RONA KAUFMANN
183 DUNKARD VALLEY ROAD
YORK PA 17403

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 WALTERMYER
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

GARY ANDERSON
322 MOHAWK DRIVE
RED LION PA 17356

CAROLE LONG
844 WOOLEN MILL ROAD
STEWARTSTOWN PA 17363

CHRISTINE BLOUSE
BRENTON BLOUSE
IAN BLOUSE
PAIGE BLOUSE
27 GODFREY ROAD
FELTON PA 17322

ALAN YOST
16154 LITTLE ROAD
STEWARTSTOWN PA 17363

JAKE TAYLOR
1505 WOOD BIRE ROAD
AIRVILLE PA 17302

RAYMOND R LINS
RACHEL L LINS
1017 ORCHARD ROAD
NEW PARK PA 17352

JASON WOLFE
STACEY WOLFE
3198 NEW PARK ROAD
NEW PARK PA 17352

TWIN GOOD FARMS
CATHY GOOD
68 REED ROAD
AIRVILLE PA 17302

BYRON JESS BOYD
831 NEW PARK ROAD
NEW PARK PA 17352

JOHN HAMILTON
CAROL HAMILTON
562 WOOLEN ROAD
STEWARTSTOWN PA 17363

HENRY SOMMER
GLENDA SOMMER
2340 NEW PARK ROAD
NEW PARK PA 17352

MAPLE LAWN FARMS INC
251 E MAPLE LAWN ROAD
NEW PARK PA 17352

KATHERINE STEWART
14 E PENNSYLVANIA AVE
YOE PA 17313

DANIEL MCELWAIN
338 MARSTELLER RD
NEW PARK PA 17352

DEREK DETTINGER
24 CHANCEFORD RD
BROGUE PA 17309

ROBERT BOWNMAN
TRISHA BOWMAN
11721 MUDDY CREEK RD
AIRVILLE PA 17302

GREGORY WILT
KRISTINA WILT
353 MARSTELLER RD
NEW PARK PA 17352

M KATHRYN JUDY
STEPHEN JUDY
93 KENNEDY RD
AIRVILLE PA 17302

WESTLEY TOMPKINS
360 HIGH ROCK RD
AIRVILLE PA 17302

BRETT TOMPKINS
245 ZION CHURCH RD
RED LION PA 17356

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

E-SERVICE

DIANE M NEFF
586 FROSTY HILL ROAD
AIRVILLE PA 17302

ROBERT MICKEY
JOHNEVA MICKEY
224 LEIB RD
NEW PARK PA 17352

THOMAS KRELL JR
APRIL KRELL
6720 MACBETH WAY
SYKESVILLE MD 21784

GEORGE TREADWAY
2503 CRESTVIEW DR
FALLSTON MD 21047

ZAC MOSER
233 W MAPLE LAWN RD
NEW PARK PA 17352

HARRY PEIFFER JR
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

RUSSELL BURTON
8 S MAIN ST
JACOBUS PA 17407

JONATHAN HASH
1790 NEW PARK RD
NEW PARK PA 17352

KENT BLEVINS
16186 W LIBERTY RD
STEWARTSTOWN PA 17363

KELLY MUSSER
5267 SNYDER LN
YORK PA 17406

LEONARD TRAYNOR II
JUSTINE TRAYNOR
900 HICKORY HILL LN
YORK PA 17402

MICHAEL CORDELL
4219 ALTENWALD RD
WAYNESBORO PA 17268

BRANDY MILLER
333 TOMLINSON RD
AIRVILLE PA 17302

GARLAND SWEITZER
531 GOOD RD
AIRVILLE PA 17302

WILLIAM GROVE
63 W SNYDER CORNER RD
RED LION PA 17356

BLAINE HAM
TONY HAM
615 SLAB RD
DELTA PA 17314

KENNY GROVE
278 OAKBROOK DR
FELTON PA 17322

CLETUS GOHN
DIANE GOHN
737 GOOD RD
AIRVILLE PA 17302

VIRGINIA GIBBLE
GINNY GIBBLE
30 SCHOOL HOUSE RD
LANCASTER PA 17603
717.397.0237

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

WILLIAM CREAMERS
54 ARNOLD RD
NEW PARK PA 17352

NEIL AUTRY
625 ALUM ROCK RD
NEW PARK PA 17352

CHRISTINE CROWE
735 JEFFERSON LN
RED LION PA 17356

LEONARD TRAYNOR
SANDRA TRAYNOR
523 ALUM ROCK ROAD
NEW PARK PA 17352

DOUGLAS ROHRER
MARTHA ROHRER
1728 BRIDGE ROAD
LANCASTER PA 17602

DEBORAH MACKLIN
ANDREW MACKLIN
MACKLIN FARMS
518 GOOD ROAD
AIRVILLE PA 17302

HUGH MCPHERSON
2885 NEW PARK ROAD
NEW PARK PA 17352

J LAMAR ROHRER
KIRA D ROHRER
1110 VILLAGE ROAD
LANCASTER PA 17602

LYNDA MANNING
121 SALT LAKE RD
FAWN GROVE PA 17321
717.382.4925

DAWN MARKUS
LEAH MARKUS
7641 BURKHOLDER RD
WAYNESBORO PA 17268

THOMAS L RAMSEY
PATRICIA COULSON
7189 FAIRWAY DRIVE SOUTH
FAYETTVILLE PA 17222
717.818.7093

LAURIE DONALDSON
241 GROVE RD
STEWARTSTOWN PA 17363
717.332.9077

REGINA MANCUSO
14 SANIBEL LANE
CHAMBERSBURG PA 17201

WILLIAM FOGAL
ELIZABETH RENZULLI
1838 FALCON LANE
CHAMBERSBURG PA 17202

KATHLEEN KAUFFMAN
2917 ADAMS DR
CHAMBERSBURG PA 17202

LEONARD KAUFFMAN
MARY KAUFFMAN
4297 OLDE SCOTLAND RD
CHAMBERSBURG PA 17202

C STEWART MCCLEAF
WASHINGTON TOWNSHIP SUPERVISORS
13013 WELTY ROAD
WAYNESBORO PA 17268
717.762.3128

VINCENT SERRA
NICOLE SERRA
1219 MASON DIXON ROAD
GREENCASTLE PA 17225

DANIELLE BERNECKER
1827 WOOD DUCK DR E
CHAMBERSBURG PA 17202

ERIC SCOTT BURKHOLDER
315 LEEDY WAY WEST
CHAMBERSBURG PA 17202

AARON KAUFFMAN
MELINDA KAUFFMAN
4220 OLD SCOTLAND RD
CHAMBERSBURG PA 17202

WILLA WELLER KAAL
67 SUMMER BREEZE LANE
CHAMBERSBURG PA 17202

LUWANDA MUMMA
693 FALLING SPRING RD
CHAMBERSBURG PA 17202

ROBERTA SCOTT
6239 MARSH ROAD
WAYNESBORO PA 17268

FRANCES MCDERMOTT
782 FRANKLIN SQUARE DRIVE
CHAMBERSBURG PA 17201

SPENCER PHEIL
BRECHYN CHACE
CAITLIN RAMSEY
6167 GREENBRIAR TERRACE
FAYETTEVILLE PA 17222

DONALD LEHMAN
WAYNE LEHMAN
686 MOWER RD
CHAMBERSBURG PA 17202

LOIS WHITE
1406 WALKER ROAD
CHAMBERSBURG PA 17202

CRAIG NITTERHOUSE
PAGE NITTERHOUSE
1785 FALLING SPRING RD
CHAMBERSBURG PA 17202

COLBY NITTERHOUSE
LEAH NITTERHOUSE
2479 NEWCOMER RD
CHAMBERSBURG PA 17202

JOSEPH REBOK
MARY ANN REBOK
37 LINOAK RD
CHAMBERSBURG PA 17202

MICHAEL CORDELL
4219 ALTENWALD RD
WAYNESBORO PA 17268

JAN HORST
GEORGIANA HORST
826 NEW FRANKLIN RD
CHAMBERSBURG PA 17202

JUSTIN DUNLAP
SHARLA DUNLAP
8015 HIDDEN VALLEY LN
WAYNESBORO PA 17268

ANNE FINUCANE
BRENDAN FINUCANE
2760 SPRINGVIEW DRIVE
CHAMBERSBURG PA 17202

ALLEN RICE
LORI RICE
1430 HENRY LANE
CHAMBERSBURG PA 17202

ELLEN ENGLE
MILTON ENGLE
5765 MANHEIM RD
WAYNESBORO PA 17268

ALLAN STINE
HEATHER STINE
867 CIDER PRESS ROAD
CHAMBERSBURG PA 17202

BONNIE BYERS
SUZY HUGHES
4200 DIXIE AVENUE
CHAMBERSBURG PA 17202

LAURIE VIOZZI
2723 NEWCOMER RD
CHAMBERSBURG PA 17202

KENNETH LEHMAN
1592 FAIRVIEW AVENUE
CHAMBERSBURG PA 17202

ELLEN BLACK
536 BRIAR LANE
CHAMBERSBURG PA 17202

DOREEN RICE
FRED RICE
3410 CHURCH RD
CHAMBERSBURG PA 17202

KIMBERLY CALIMER
3136 CHURCH RD
CHAMBERSBURG PA 17202

ROBERTA LAWYER
8617 SHEFFIELD MANOR BLVD
WAYNESBORO PA 17268

JAY FRECH
RUTH FRECH
5617 MANHEIM RD
WAYNESBORO PA 17268

ROY CORDELL
EMMA CORDELL
4690 FETTERHOFF CHAPEL ROAD
CHAMBERSBURG PA 17202

NORMA RICKER
WALTER RICKER
3063 NEW FRANKLIN ROAD
CHAMBERSBURG PA 17202

MICHAEL KATZ
6267 CROOKED STICK LANE
FAYETTEVILLE PA 17222

WALTER PORTMANN
146 HARVEST LANE
CHAMBERSBURG PA 17202

FRED BYERS
1863 COLDSMITH RD
SHIPPENSBURG PA 17257

HAROLD BARNES
NANCY BARNES
1511 SPRINGSIDE DRIVE EAST
CHAMBERSBURG PA 17202

MARTHA BUHRMAN
3453 HERTOY LANE
FORT LOUDON PA 17224

S SUSAN MCMURTRAY
1567 SPRING SIDE DRIVE EAST
CHAMBERSBURG PA 17202

ROB MOWER
904 WALKER ROAD
CHAMBERSBURG PA 17202

JOY BANZHOF
709 CUMBERLAND AVENUE
CHAMBERSBURG PA 17201

DEBORAH SCHREIBER-OTT
1546 SPRING SIDE DR EAST
CHAMBERSBURG PA 17202

MIKE MARTINEZ JR
2725 JEFFREY LN
YORK PA 17402

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

MANDY WELCH
SCOTT WELCH
1101 FURNACE RD
AIRVILLE PA 17302

JAMIE DIAMOND
RICHARD DIAMOND
13540 TROUT SCHOOL RD
FELTON PA 17322
717.993.0849

VALERIE DORN
8358 BLUE BALL RD
STEWARTSTOWN PA 17363

KATHERINE TRAYNOR
MADELINE TRAYNOR
331 LAUREL DR
YORK PA 17406

THOMAS WHEATLEY
615 ALUM ROCK RD
NEW PARK PA 17352

T R CORCORAN
335 GOOD RD
AIRVILLE PA 17302

JON SMELTZER
2505 DELTA RD
BROGUE PA 17309

BILL WILT
280 MEGGON RD
RED LION PA 17356

MAC MOSER
725 FAWN GROVE RD
FAWN GROVE PA 17321

DEAN MOSER
106 DEER RD
FAWN GROVE PA 17321

ANN LAVIN
1175 FAWN GROVE ROAD
NEW PARK PA 17352

JENNIFER CLUBB
JOSEPH CLUBB
4400 BATTLE HILL ROAD
BROGUE PA 17309

MARGARET WILLIAMS
90 S OAK HEIGHTS TRAIL
DELTA PA 17314

DAVID KOONS
1032 BLYMIRE ROAD
DALLASTOWN PA 17313

CHRISTINE ROGERS
256 SOUTH CAMP STREET
RED LION PA 17366

TIMOTHY KRICK
13436 PRUITT LANE
PRICNESS ANNE MD 21853

DIANA KEYS
GARRY KEYS
201 WHEELER SCHOOL ROAD
PYLESVILLE MD 21132

JOHN KRICK
945 ORCHARD ROAD
NEW PARK PA 17352

DOUG MCKOY
11011 GIPE ROAD
CHANCEFORD PA 17322

CRAIG SANSONETTI PRESIDENT
MARYLAND & PENNSYLVANIA RAILROAD
PRESERVATION SOCIETY
PO BOX 2262
YORK PA 17405
717.862.3259

DAVID MILLER
SUSAN MILLER
MILLERS FUEL SUPPLY
PO BOX 355
3068 DELTA RD
AIRVILLE PA 17302

JIM STRACK
2010 GARNET RD
YORK PA 17403

LINDA A DICKINSON
63 DOWNS AVE
AIRVILLE PA 17302

JIM HERSHEY
49 STRAWBRIDGE RD
NEW PARK PA 17352

JENNIFER RUMBAUGH
5905 BUTTERMILK RD
WAYNESBORO PA 17268

GARY MINK
STEVEN MINK
220 GROVE RD
STEWARTSTOWN PA 17363

COLT MARTIN
KRISTYN MARTIN
8020 HIDDEN VALLEY RD
WAYNESBORO PA 17268

DEBORAH PFLAGER
133 MYRTLE AVE
WAYNESBORO PA 17268

MARIA WHALEN
PETER WHALEN
12 MCCOY LN
CARLISLE PA 17105

KRISTI TAYLOR
118 GORAM RD
BROGUE PA 17309

KIRA ROHRER
1110 VILLAGE RD
LANCASTER PA 17602

KATHLEEN TOMPKINS
1056 MUDDY CREEK RD
AIRVILLE PA 17302

PATRICE TAYLOR
183 BUECKER RD
DELTA PA 17314

GUILDFORD TOWNSHIP SUPERVISORS
115 SPRING VALLEY RD
CHAMBERSBURG PA 17201

ASHLEY HOSPELHORN
8010 HIDDEN VALLEY LN
WAYNESBORO PA 17268

ASHLEY HOSPELHORN
116 WEST 3RD STREET
WAYNESBORO PA 17268

DM FARMS LLC
BRIAN BECHBILL
13689 DREAM HIGHWAY
NEWBURG PA 17240

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

DALE & BARBARA TORBET
405 THRONE RD
FAWN GROVE PA 17321

ROBERT BURCHETT
JUDY BURCHETT
THOMAS BURCHETT
STACY BURCHETT
175 FROSTY MILL RD
AIRVILLE PA 17302

JOSEPH & BARBARA LAPP
142 CONOWINGO RD
QUARRYVILLE PA 17566

MERVIN & GLADYS MILLER
95 BURNS RD
BROGUE PA 17309

AMOS & ELIZABETH ESH
460A STRASBURG RD
PARADISE PA 17562

WILLIAM & JANE PETERS
2062 DRUID PARK DR
BALTIMORE MD 21211

BURTON FAMILY LP
3731 ABINGDON BEACH RD
ABINGDON MD 21009

GLEN BRADLEY
825 CEDAR VALLEY RD
NEW PARK PA 17352

D ARTHUR GROVE
DAVID R GROVE
489 DAVIS RD
NEW PARK PA 17352

RGRG PARTNERS
C/O RICHARD WILSON
1407 THISTLEWOOD LN
STEWARTSTOWN PA 17363

JEFFERSON & LAURA BRACEY
815 CEDAR VALLEY RD
NEW PARK PA 17352

BARLEY FARMS LP
175 CHESTNUT GROVE RD
CONESTOGA PA 17516

TROY KLINE
4886 MILL RD
BROGUE PA 17309

JOHN BLAIR
11611 PRICES CHURCH RD
WAYNESBORO PA 17268

MARY ANN & DUWAYNE FOX
6977 IRON BRIDGE RD
WAYNESBORO PA 17268

DONALD & BEVERLY FAHRNEY
9249 HARLEE RD
WAYNESBORO PA 17268

JACK & EMILY MARTIN
12574 POLKTOWN RD
WAYNESBORO PA 17268

JASON & MEGAN Martin
5102 POLKTOWN RD
WAYNESBORO PA 17268

JANE ZEIGER
5886 HESS BENEDICT RD
WAYNESBORO PA 17268

DONALD & ISABELL HESS
5215 HESS BENEDICT RD
WAYNESBORO PA 17268

DENVER & KATRINA MARTIN
6973 NUNNERY RD
WAYNESBORO PA 17268

JOSEPH WEAGLEY
6413 MARSH RD
WAYNESBORO PA 17268

DANIEL & ELAINE ESHELMAN
13310 N. HOOVERS MILL RD
WAYNESBORO PA 17268

ROGER & JOYCE DILLER
5505 OLDE SCOTLAND RD
SHIPPENSBURG PA 17257

GBR LINCOLN HWY, LLC ET AL
150 TARRYTOWN RD
WHITE PLAINS NY 10591

SUMMIT PARTNERS, LLC
100 COLONIAL WAY
WEST CHESTER PA 19382

JASON & ROSALIE HOSTETTER
2048 GUILFORD STATION RD
CHAMBERSBURG PA 17202

DARRYL BENDER
5079 YOHE RD
WAYNESBORO PA 17268

DONNA BENDER
1013 S FIFTH ST
CHAMBERSBURG PA 17202

SALT CREEK PARTNERS, LLC
1112 KENNEBEC DR
CHAMBERSBURG PA 17201

CHARLES MELLOTT
9702 WAYNE HWY
WAYNESBORO PA 17268

RONALD & DORIS STONER
11623 KOONS RD
WAYNESBORO PA 17268

HAROLD WENGER LIVING TRUST
C/O ELVA WENGER
2146 CIDER PRESS RD
CHAMBERSBURG PA 17202

JOHN & ALLISON STEIGER
5465 HESS BENEDICT RD
WAYNESBORO PA 17268

IVAN & ELLEN HORST
2732 SOLLENBERGER DR
CHAMBERSBURG PA 17202

GUILFORD WATER AUTHORITY
115 SPRING VALLEY RD
CHAMBERSBURG PA 17202

KENNETH & MARIE LEHMAN
6403 HESS BENEDICT RD
WAYNESBORO PA 17268

DONALD & DENISE MARTIN
1946 NEWCOMER RD
CHAMBERSBURG PA 17202

WILLIAM & DIANE NITTERHOUSE
1130 CIDER PRESS RD
CHAMBERSBURG PA 17202

LEMMA & O'CONNOR INVESTORS, LLC
3645 FOX HILL DR
CHAMBERSBURG PA 17202

ROY & REGINA MARTIN
4925 SHADY LN
WAYNESBORO PA 17268

CHAMBERSBURG AREA SCHOOL DISTRICT
511 S. SIXTH ST
CHAMBERSBURG PA 17202

CHARLES DILLER
90 MENNO VILLAGE
CHAMBERSBURG PA 17202

JAMES & MABLE DILLER
552 KOHLER RD
CHAMBERSBURG PA 17202

JOHN & MARGARET DILLER
550 KOHLER RD
CHAMBERSBURG PA 17202

MARY & CHARLES HENRY
MARION CARMACK
D YVONNE FRANK
506 SOUTH EDWARDS AVE
CHAMBERSBURG PA 17202

CHAMBERSBURG MALL REALTY LLC
150 GREAT NECK RD STE 304
GREAT NECK NY 11021

CHAMBERSBURG CH LLC
88 N 2ND STREET STE 100
HARRISBURG PA 17102

CHAMBERSBURG NASSIM LLC
1265 DRUMMERS LN STE 209
WAYNE PA 19087

MAHLON & DEBRA EBY
6685 ANTHONY HWY
WAYNESBORO PA 17268

RICHARD & AGNES LESHER
1126 CIDER PRESS RD
CHAMBERSBURG PA 17202

LAVERNE & ELLEN MARTIN
14578 WAYNE HWY
WAYNESBORO PA 17268

SAMUEL & MANDY JONES
7583 LYONS RD
WAYNESBORO PA 17268

CHARLES STAMY FOX
37 FIFTH AVENUE
CHAMBERSBURG PA 17201

MARLIN & CARRIE MARTIN
7665 ANTHONY HWY
WAYNESBORO PA 17268

OWLS CLUB, INC.
87 W MAIN ST
WAYNESBORO PA 17268

BRUCE NEIBERT JR
7353 IRON BRIDGE RD
WAYNESBORO PA 17268

LOWES HOME CENTERS, INC.
1600 LINCOLN WAY EAST
CHAMBERSBURG PA 17202

KEITH BENEDICT
7366 BRECHBILL LOOP RD
CHAMBERSBURG PA 17202

DEREK BENEDICT
1883 RAGGED EDGE RD
CHAMBERSBURG PA 17202

DARED BENEDICT
3210 CHURCH RD
CHAMBERSBURG PA 17202

PATRIOT FEDERAL CREDIT UNION
800 WAYNE AVE
CHAMBERSBURG PA 17201

CHARLES & EDNA FOX
37 FIFTH AVENUE
CHAMBERSBURG PA 17202

TUNDE TIJANI
503 BROOKVIEW DR
GREENCASTLE PA 17225

LAMAR & ESTHER HORST
11599 KOONS RD
WAYNESBORO PA 17268

IVAN & RUBY BENEDICT
3307 COLLEGE DR
CHAMBERSBURG PA 17202

RICHARD & FERN PECK
4017 ALTENWALD RD
WAYNESBORO PA 17268

MYRON & FERN MILLER
9180 GOODS DAM RD
WAYNESBORO PA 17268

WEST PENN POWER COMPANY
76 S MAIN ST
AKRON OH 44308

IESI PA BLUE RIDGE LANDFILL CORP
PO BOX 399
SCTOLAND PA 17254

KIMBERLY & DAVID NEIBERT
14898 WAYNE HWY
WAYNESBORO PA 17268

WILLIS LESHER
1153 SWAMP FOX RD
CHAMBERSBURG PA 17202

JOHN & EUNICE RUDOLPH
7270 BUTTERMILK RD
WAYNESBORO PA 17268

KYLE & KELLY SCHINDEL
22032 ROCKY FORGE RD
HAGERSTOWN MD 21740

LAMAR & EDNA RUDOLPH
5401 MANHEIM RD
WAYNESBORO PA 17268

DANIEL & DOREEN STRITE
6032 BUTTERMILK RD
WAYNESBORO PA 17268

KAREN BENEDICT
RODNEY MEYER
5419 MANHEIM RD
WAYNESBORO PA 17268

JOHN & PENNY GARBER
7787 BURKHOLDER RD
WAYNESBORO PA 17268

GERALD & JENNIFER ZEIGLER
PO BOX 121
WAYNESBORO PA 17268

MARK & SALLY GAYMAN
5460 STAMEY HILL RD
WAYNESBORO PA 17268

EDWIN & DAWN SHANK
3854 OLDE SCOTLAND RD
CHAMBERSBURG PA 17202

REK PROPERTIES, LLC
1658 LINCOLN WAY EAST
CHAMBERSBURG PA 17202

LYNN & MARY ETTER
5167 OLDE SCOTLAND RD
SHIPPENSBURG PA 17257

MARGARET MOWER
683 MOWER RD
CHAMBERSBURG PA 17202

J RAY & LINDA GEESAMAN
4986 MANHEIM RD
WAYNESBORO PA 17268

ELAM & MARY REIFF
275 GOODHART RD
SHIPPENSBURG PA 17257

CLARA & DANIEL BENEDICT
4574 ALTENWALD RD
WAYNESBORO PA 17268

J NORMAN & BONNA JANE DILLER
20660 MILLERS CHURCH RD
HAGERSTOWN MD 21742

GLENN & ELAINE EBERLY
78 GARAGE PLACE RD
GHENT NY 12075

DOUGLAS & NELLIE STRALEY
89 CHERRY AVENUE
CHAMBERSBURG PA 17202

JOSHUA & NICOLE DILLER
4913 OLDE SCOTLAND RD
SHIPPENSBURG PA 17257

TAMMY JO & RODERICK C.B. SALTER
MICHAEL & TAMRA FREDERICK
1218 GOLDEN WEST WAY
LUSBY MD 20657

KEVIN & FAYE GAYMAN
9611 PINE ROAD
ORRSTOWN PA 17244

GRANT GAYMAN
11742 GEHR RD
WAYNESBORO PA 17268

PAUL & MARY BAKER
4270 OAK HILL RD
WAYNESBORO PA 17268

FORRESTER FARMS, II, INC
3162 WHITE CHURCH RD
CHAMBERSBURG PA 17202

MARVIN & LOIS MARTIN
7016 MENTZER GAP RD
WAYNESBORO PA 17268

FRANKLIN COUNTY VISITORS BUREAU C/O
JANET POLLARD
37 SOUTH MAIN ST STE 100
CHAMBERSBURG PA 17201

CLINTON BARKDOLL ESQUIRE
KULLA, BARKDOLL & STEWART, P.C.
9 EAST MAIN STREET
WAYNESBORO PA 17268
717.762.3374