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File #: 166570

December 13, 2018

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: 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 and West Projects in Portions of Franklin and York Counties, Pennsylvania Docket No. A-2017-2640195 & A-2017-2640200

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

Petition of Transource Pennsylvania, LLC for a finding that a building to shelter control equipment at the Furnace Rune Substation in York County, Pennsylvania is reasonably necessary for the convenience or welfare of the public Docket No. P-2018-3001883

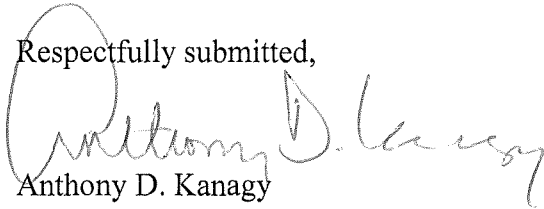
Application of Transource Pennsylvania, LLC for approval to acquire a certain portion of the lands of various landowners in York and Franklin Counties, Pennsylvania for the siting and construction of the 230 kV Transmission Lines associated with the Independence Energy Connection - East and West Projects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

Dear Secretary Chiavetta:

Rosemary Chiavetta, Secretary
December 13, 2018
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Enclosed for filing is the Answer of Transource Pennsylvania, LLC to the Motion of Citizens to Stop Transource, York County and Maple Lawn Farms, Inc. to Amend the Procedural Schedule in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Anthony D. Kanagy". The signature is written in dark ink and is positioned above the printed name.

Anthony D. Kanagy

ADK/jl
Enclosures

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

CERTIFICATE OF SERVICE

Docket Nos. A-2017-2640195 & A-2017-2640200, et al.

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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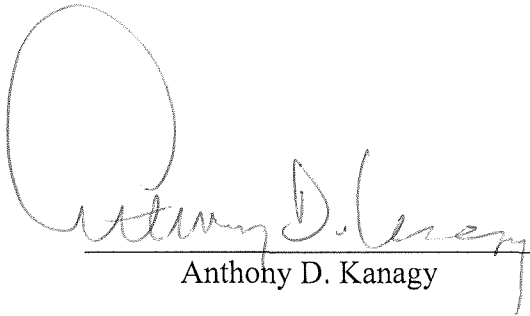
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Date: December 13, 2018



Anthony D. Kanagy

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC	:	
for approval of the Siting and Construction of	:	Docket No. A-2017-2640195
the 230 kV Transmission Lines Associated	:	Docket No. A-2017-2640200
with the Independence Energy Connection –	:	
East and West Projects in portions of Franklin	:	
and York Counties, Pennsylvania	:	
	:	
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	:	
	:	
Petition of Transource Pennsylvania, LLC for a	:	
finding that a building to shelter control	:	Docket No. P-2018-3001883
equipment at the Furnace Run Substation in	:	
York County, 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	:	Docket No. A-2018-3001881, <i>et al.</i>
lands of various landowners in York and	:	
Franklin Counties, Pennsylvania for the siting	:	
and construction of the 230 kV Transmission	:	
Lines associated with the Independence Energy	:	
Connection – East and West Projects as	:	
necessary or proper for the service,	:	
accommodation, convenience or safety of the	:	
public	:	

**ANSWER OF TRANSOURCE PENNSYLVANIA, LLC.
TO THE MOTION OF CITIZENS TO STOP TRANSOURCE,
YORK COUNTY AND MAPLE LAWN FARMS, INC.
TO AMEND THE PROCEDURAL SCHEDULE**

I. INTRODUCTION

Transource Pennsylvania, LLC (“Transource PA or the “Company”), hereby submits this Answer to Citizens to Stop Transource, York County and Maple Lawn Farms, Inc. (“Stop

Transource York County”) to Amend the Procedural Schedule (“Motion”). Stop Transource York County’s request to amend the procedural schedule by allowing an additional five months for the preparation of its surrebuttal testimony is unreasonable and should be denied.

As explained in more detail below, Transource PA’s rebuttal testimony directly responds to issues raised by other parties in their direct testimony and at the public input hearings. Transource testified that the Project would have reliability benefits with its direct testimony. OCA challenged this in its direct testimony and Transource PA responded in its rebuttal. This is not a new claim. Moreover, Stop Transource York County has not asked any discovery regarding these issues or any issues. Stop Transource York County’s delay in seeking discovery is not a basis for extending the schedule.

Stop Transource York County also argues that Transource PA introduced twelve new witnesses and that this justifies an extension of the schedule. This argument should be summarily dismissed. Stop Transource York County did not submit any direct testimony in this proceeding. In addition, three of the twelve new witnesses are merely substitute witnesses for former witnesses that have taken new positions. Five of the new witnesses address subjects that were raised in the public input hearings. Another three witnesses address subjects there were raised by Stop Transource Franklin County and the OCA. Transource PA has a right to respond to public input hearing testimony and to present new witnesses to do so. Transource PA also has the right to have new rebuttal witnesses address issues raised in other parties’ direct testimony. It is not reasonable for Stop Transource York County to request an extension of the schedule on the basis that there are new witnesses especially when Stop Transource York County did not even submit direct testimony.

Stop Transource York County also argues that the recent delay in the in-service date justifies its request for an extension. This is completely incorrect. The delay in the in-service date was a direct result of prior delays in the schedule and does not provide the basis for a further extension.

Parties' repeated requests to delay the schedule should not be accepted and are transparent attempts to use delay as a tactic to attempt to prevent construction. This is prejudicial to Transource PA and should not be accepted. The schedule in this proceeding is already significantly longer than other transmission line cases and should not be further delayed.

II. BACKGROUND

The procedural history in this case is lengthy. This background is limited to only the portions of the procedural history that are relevant to Stop Transource York County's Motion. As explained herein, Stop Transource York County's request for additional time to submit its surrebuttal testimony is simply another attempt to unnecessarily delay a ruling on the merits of the proposed Project and should be denied.

Almost one year ago, on December 27, 2017, Transource PA filed the "Application of Transource Pennsylvania, LLC filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-East Project in Portions of York County, Pennsylvania." Also on December 27, 2017, Transource PA filed the "Application of Transource Pennsylvania, LLC filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project in Portions of Franklin County, Pennsylvania," (collectively, the "IEC Project"). Along with the Siting Applications, Transource PA filed the supporting direct testimony of six witnesses.

The IEC Project has two components—the IEC-West Project, which consists of the siting and construction of the Rice-Ringgold 230 kV Transmission Line in portions of Franklin County, Pennsylvania, and the IEC-East Project, which consists of the siting and construction of the Pennsylvania portion of the Furnace Run-Conastone 230 kV Transmission Line in portions of York County, Pennsylvania. As part of the IEC Project, Transource PA proposes to construct two new substations: the Furnace Run Substation to be located in York County, Pennsylvania and the Rice Substation to be located in Franklin County, Pennsylvania.

The IEC Project was approved by the PJM Board in August 2016 following TEAC and stakeholder review of the Project as described in the testimony of witness Herling (see Transource PA Statement No. 7-R, p. 4, adopting the direct testimony of Paul McGlynn at p. 33). The IEC Project was approved by PJM Interconnection, L.L.C. (“PJM”) to alleviate transmission congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia. Although the primary benefits from the IEC Project relate to market efficiency and the reduction of congestion costs, the new transmission facilities associated with the IEC Project will also enhance the electrical strength and reliability of the transmission system by virtue of the new transmission facilities in the area that will be part of the interconnected transmission grid, as originally explained in the Direct Testimony of Witness Ali, submitted on December 27, 2017. The IEC Project will provide additional and alternative paths for electricity in the event of outages on other Pennsylvania transmission facilities. The IEC Project will also allow the interconnection of future reliability, generation, and load projects in the area. Company Witness Ali explained these secondary reliability benefits in his direct testimony. See Transource PA Statement No. 2, pp. 11-12.

Following the submission of the Company's direct testimony, PJM re-evaluated the IEC Project. The results of the most recent re-evaluation were presented at the September 13, 2018 Transmission Expansion Advisory Committee ("TEAC") meeting. As explained in the rebuttal testimony of Company Witness Herling, the re-evaluation revealed that, while Project 9A was originally approved as a market efficiency project, it is now expected to provide reliability benefits because PJM has identified that if the Project were not to go forward, reliability violations would occur on parts of the system (see Transource PA Statement No. 7-R, pp. 16-18).

During the initial development of a procedural schedule, the Office of Consumer Advocate ("OCA") advocated for a schedule that set the deadline for filing reply briefs over a year from the date the Company filed its Application. The OCA's recommended schedule was nearly four months longer than the schedule proposed by the Company. Other parties supported the OCA's proposed schedule (Tr. at p. 68). The OCA's preferred schedule was ultimately adopted, despite being much longer than schedules previously adopted in other transmission line siting applications.

On June 1, 2018, the OCA filed a motion requesting that the deadline for submitting intervenor direct testimony be extended by 60 days or until September 25, 2018. On June 26, 2018, the ALJs granted OCA's motion allowing intervenors until September 25, 2018 to submit their direct testimony (Third Prehearing Order, p. 10). The OCA then recommended that the remainder of the procedural schedule be extended so that reply briefs would be filed on April 17, 2019 (OCA Second Prehearing Memo, p. 11). The Company proposed that the original reply brief date of February 28, 2019 be retained (Transource PA Second Prehearing Memo, p. 5). At the Second Prehearing Conference, Stop Transource York County supported the OCA's proposed extension of the schedule (Tr. at pp. 1635-1636). Stop Transource York County

supported the OCA's position for an extended schedule for direct testimony and then did not submit any direct testimony in this proceeding. On July 30, 2018, the ALJs issued an order adopting the OCA's recommendation and setting a new reply brief date of April 17, 2019 (Fourth Prehearing Order, p. 14).

Twelve public input hearings and three days of site visits have been conducted throughout the course of the proceeding, during which approximately 368 individuals provided comments regarding the proposed Project.

Discovery in this case has been extensive. Transource PA has responded to approximately 460 interrogatories and requests for documents from various parties, many of which had multiple subparts. Stop Transource York County has not asked a single interrogatory in this proceeding.

Other parties filed direct testimony on September 25, 2018. Stop Transource York County did not file any testimony.

The Company filed its rebuttal testimony on November 27, 2018 in accordance with the new procedural schedule. The items in this rebuttal testimony were in direct response to the over 170 pages of direct testimony provided by other parties and the approximately 1,900 pages of testimony presented at the public input hearings and site visits. Under the existing procedural schedule, which already incorporates the extended schedule originally requested by the OCA and a further 60 day delay at the OCA's request both supported by Stop Transource York County, surrebuttal testimony is due 50 days after the Company's rebuttal testimony, or on January 16, 2019. On December 10, 2018, Stop Transource York County filed a motion to extend the deadline for filing surrebuttal testimony by an additional five months for a total of approximately six and one-half months to prepare surrebuttal testimony.

Further delay of this proceeding is clearly not reasonable and borders on the outrageous. Over thirty days remain until the due date for Stop Transource York County's surrebuttal testimony. Stop Transource York County has not offered sufficient justification as to why the time remaining in the existing procedural schedule is inadequate to prepare its surrebuttal testimony, especially when it did not address a single issue in direct testimony or ask a single discovery question to date. As explained below, Transource PA's rebuttal testimony responds to the direct testimony of other parties and the numerous public comments received at the public input hearings and site visits. The schedule is already much longer than procedural schedules that have been adopted in prior transmission line siting cases before the Pennsylvania Public Utility Commission ("Commission"). Stop Transource York County's request for additional time to prepare its surrebuttal testimony when it still has over thirty days is unreasonable, unnecessary and should be denied.

Transource PA notes that it has attempted to resolve this issue with Stop Transource York County, but the parties have been unable to reach an agreement.

III. ARGUMENT: STOP TRANSOURCE'S REQUEST TO EXTEND THE SCHEDULE IS UNREASONABLE AND SHOULD BE DENIED.

A. Due process does not require additional time for Stop Transource York County to submit its surrebuttal testimony.

In its Motion, Stop Transource York County alleges that due process requires an additional five months to ensure that it can conduct discovery, review discovery responses, and prepare its surrebuttal testimony (Motion, pp. 2, 5-6). Specifically, Stop Transource York County argues that Transource PA has "altered the scope and complexity of the issues that must be addressed by the intervening parties" (Motion, p. 10). However, Transource PA has not raised any new issues in its rebuttal testimony. As explained below, the rebuttal testimony of

Transource PA's witnesses is proper because it responds to issues that were raised by other parties in their direct testimony and at the public input hearings.

Stop Transource York County has failed to justify why the 50 days provided in the existing procedural schedule is insufficient for the preparation of its surrebuttal testimony. Stop Transource PA has not engaged in any form of discovery nor has it submitted any testimony in this proceeding. Approximately fifteen days have passed since Transource PA submitted its rebuttal testimony, and Stop Transource York County has yet to issue a single data request. It is clear that Stop Transource York County's request for additional time is a result of its own delay and is motivated by its desire to prolong a decision on the Project.

According to Stop Transource York County, landowners should be given an opportunity to respond to Transource PA's rebuttal testimony through additional public input hearings (Motion, p. 2). Additional public input hearings are unnecessary. Landowners had ample opportunity to provide comments at the twelve public input hearings and three days of site visits. During this time, approximately 368 landowners provided comments regarding the proposed Project. These individuals can submit surrebuttal testimony and will be given an opportunity to cross examine Transource PA's witnesses at the hearing. Due process does not require additional public input hearings after every phase of the Company's testimony.

B. Transource PA has complied with 52 Pa. Code Section 5.243.

In its Motion, Stop Transource York County suggests that Transource PA has not complied with 52 Pa. Code Section 5.243 (Motion, p. 5). Section 5.243 of the Commission's regulations provides in relevant part:

- (e) A party will not be permitted to introduce evidence during a rebuttal phase which:
 - (1) Is repetitive.
 - (2) Should have been included in the party's case-in-chief.

(3) Substantially varies from the party's case-in-chief.

As explained below, Transource PA's rebuttal testimony fully complies with Section 5.243. Stop Transource York County argues that Transource PA improperly presented testimony in rebuttal regarding reliability issues and project economics. Issues regarding Project reliability are discussed in Section C below. In addition, issues regarding Project economics are discussed in Section D below. Transource PA's rebuttal testimony responded to issues raised in other parties' direct testimony and at the public input hearings and should not be stricken. Likewise, there is no reasonable justification for extending the schedule yet again.

C. The Company's presentation of rebuttal testimony regarding the proposed Project's reliability benefits does not justify extending the existing procedural schedule or striking the relevant testimony.

Stop Transource York County states that Transource PA did not sufficiently raise reliability as a benefit of the Project until the service of rebuttal testimony (Motion, p. 9). This is simply not true. The fact that the IEC Project will result in reliability benefits is not a "new claim." Company witness Ali explained in his direct testimony:

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

(Transource PA Statement No. 2, pp. 11-12).

Not only did the Company address the Project's secondary reliability benefits in its direct case, the Company's rebuttal testimony on the issue responds to the OCA's claim in its direct testimony that the Project will not result in any reliability benefits (See OCA Statement No. 1,

pp. 6, 18, 19, 35, 44; OCA Statement No. 2, p. 10). In addition, the status of the IEC Project remains unchanged. The primary purpose of the Project is still market efficiency. The additional reliability benefits identified at the September 2018 TEAC have not resulted in the Project being designated as a reliability project or even a multi-value project.

PJM re-evaluated Project 9A in September 2018 as part of its approved processes. Transource PA advised the ALJs and the parties of this re-evaluation at the Second Prehearing Conference held on July 9, 2018 (see Fourth Prehearing Order, p. 13). When PJM conducted the re-analysis, it realized that the 1.42 benefit/cost ratio increased from the 1.32 benefit/cost ratio determined in the February 8, 2018 re-evaluation. This increase suggested to PJM that power flows might have increased on facilities in the AP-South interface, leading to potential reliability criteria violations. The reliability studies conducted by PJM in September 2018 confirmed that this was the case.

Stop Transource York County has not asked any discovery or submitted any testimony on this subject and should not be permitted to delay this proceeding due to its own shortcomings. The Company's rebuttal testimony on reliability benefits does not justify Stop Transource York County's request for additional time to prepare its surrebuttal testimony.

There is no basis for allowing Stop Transource York County more time to prepare its surrebuttal testimony or to strike Transource PA's rebuttal testimony. The Company's rebuttal testimony regarding reliability benefits is proper because the Company did address reliability benefits in its direct case, and the Company's rebuttal testimony on the issue directly responds to the OCA's claim that the Project will not result in any reliability benefits.

D. The Company's presentation of rebuttal testimony regarding Project economics does not justify extending the existing procedural schedule or striking the testimony of witness Chang.

Stop Transource York County contends that the topic of Project economics discussed by witness Chang in her rebuttal testimony was not raised in Transource PA's direct case. (Motion, p. 11) Stop Transource York County fails to recognize that this issue was raised at the public input hearings. For example, various individuals argued that the Project does not provide employment or economic stimulus value to Pennsylvania (see, e.g., Tr. at pp. 1060, 1075, 1101, 1128, 1135). Transource PA has a right to respond to issues raised at the public input hearings just as it has a right to respond to issues raised in other parties' written direct testimony. In addition, at the Second Prehearing Conference, ALJ Barnes advised the Company that she was interested in benefits to Pennsylvania. Ms. Chang's testimony is also responsive to this statement.

Witness Chang's testimony also responds to the OCA's claim that PJM's market efficiency analysis overstates the IEC Project's benefits (OCA Statement No. 1, pp. 34, 42), as well as the OCA's claim that the addition of certain energy efficiency resources will reduce the need for the IEC Project (OCA Statement No. 3, p. 30). There is no basis for extending the schedule or striking witness Chang's rebuttal testimony because it responds to issues raised by other parties in direct testimony and at the public input hearings.

E. The addition of new witnesses at the rebuttal phase does not justify extending the existing procedural schedule.

Stop Transource York County argues that it should be given additional time to prepare its surrebuttal testimony because the Company added twelve new witnesses in its rebuttal case (Motion, pp. 11-12). Simply citing to the Company's number of rebuttal witnesses does not justify Stop Transource York County's request for more time. The addition of witnesses did not

result in the introduction of any new issues that were not raised in other parties' direct testimony or by witnesses at the public input hearings. The Company has a right to add new witnesses at the rebuttal stage to address claims raised by other parties in their direct case, and it is customary and helpful to do so. Introducing new witnesses with specific technical knowledge to provide the best knowledge base to support rebuttal testimony addressing the specific issues raised by intervenor direct testimony does not justify a delay in the remaining procedural schedule. It is common practice to add new witnesses in rebuttal testimony. For example, in the Susquehanna-Roseland case, Docket No. 2009-2082652, the Applicant added nine new witnesses in rebuttal, none of whom submitted direct testimony. Moreover, in its Prehearing Memorandum, Transource PA reserved the right to add additional witnesses to address issues in rebuttal (see Transource PA Prehearing Memorandum, p. 7).

The Company substituted three new witnesses, Brian Weber, Steve Herling, and Timothy Horger for two of its former witnesses, Peggy Simmons and Paul McGlynn. These witnesses were not introduced for the purpose of addressing new issues. Rather, these new witnesses replaced witnesses whose job duties changed in the course of the past 12 months and are no longer responsible for their former roles with the IEC Project. These new witnesses simply adopted the prior witnesses' direct testimony, with the only changes being to the witness qualifications and background, and responded to the issues that the prior witnesses would have addressed in rebuttal testimony. In the case of Mr. McGlynn, two new witnesses, Mr. Herling and Mr. Horger, were needed to cover Mr. McGlynn's areas of expertise.

In addition, many of the issues that are addressed by new witnesses are in response to topics raised at the numerous public input hearings and site visits, during which approximately 368 individuals provided comments. For example, the rebuttal testimonies of J. Michael Silva,

Dr. Nancy Lee, and Dr. Dwight Mercer all address issues related to electromagnetic fields, a topic that was extensively raised in testimony during public input hearings. The rebuttal testimonies of David Dominy and William Rothman discuss real estate value impacts, which was also raised at the public input hearings. The Project economics discussed by witness Chang in her rebuttal testimony were raised at the public input hearings. Various individuals argued that the Project does not provide employment or economic stimulus value to Pennsylvania (see, e.g., Tr. at pp. 1060, 1075, 1101, 1128, 1135). Transource PA has a right to respond to issues raised at the public input hearings just as it has a right to respond to issues raised in other parties' written direct testimony.

Witness Chang's testimony also responds to the OCA's claim that PJM's market efficiency analysis overstates the IEC Project's benefits (OCA Statement No. 1, pp. 34, 42), as well as the OCA's claim that the addition of certain energy efficiency resources will reduced the need for the IEC Project (OCA Statement No. 3, p. 30). Witness Cawley's testimony responds to OCA witness Rubin's claims regarding PJM's cost/benefit analysis (OCA St. No. 1, p. 24). Keith Yamatani's rebuttal testimony relates specifically to karst issues raised by Stop Transource Franklin County.

Stop Transource York County did not file direct testimony as to any issue in this proceeding. Thus, Stop Transource York County should not need additional time to respond to these issues in surrebuttal when they were not addressed by Stop Transource York County in its direct case. In addition, it is unreasonable for Stop Transource York County to criticize Transource PA for adding several new witnesses to respond to issues raised by over 350 individuals that presented testimony at the public input hearings and site visits.

F. **The Project's new in-service date is a result of previous requests to extend the procedural schedule.**

Stop Transource York County contends that Transource PA has voluntarily delayed the in-service date for the Project by five months, from June 1, 2020, to November 1, 2020 (Motion, p. 13). For this reason, Stop Transource York County contends that no prejudice would result from granting its requested extension of the surrebuttal testimony due date and remaining procedural schedule.

Stop Transource York County's characterization of the modified in-service date as "voluntary" is inaccurate. The new in-service date is a direct result of previous attempts by other parties to delay the procedural schedule and, ultimately, a Commission decision, which Transource PA has opposed. As explained above, the OCA has made, and Stop Transource York County has supported, multiple attempts to delay the procedural schedule in this case since it was filed on December 27, 2017. The current schedule provides for a reply brief date of April 17, 2019, fourteen months after the filing of the Company's Application in December 2017.¹ The existing schedule allows ample time for the parties to prepare their surrebuttal testimony. Stop Transource York County's request to further delay the schedule and, ultimately, a decision on the merits of the Project is unnecessary, unreasonable, and prejudicial. Therefore, it should be denied.

G. **Stop Transource York County has supported delaying the procedural schedule in this proceeding.**

Stop Transource York County's Motion is just another attempt to delay a decision on the merits of the proposed Project. During the initial development of a procedural schedule, the OCA advocated for a schedule that set the deadline for filing reply briefs over a year from the

¹ For reference, the case would already be briefed under the schedule originally proposed by the Company, consistent with procedural schedules for other electric transmission siting cases that have been approved by the Commission.

date the Company filed its Application. Stop Transource York County supported the OCA's schedule. The Company requested a reply brief date that was approximately 10 months from the filing date. The OCA's preferred schedule was ultimately adopted, despite being much longer than schedules previously adopted in other transmission line siting applications.

Despite having approximately six months from the date of the Company's filing to prepare its direct testimony, on June 1, 2018, the OCA filed a motion requesting that the deadline for submitting intervenor direct testimony be extended by 60 days or until September 25, 2018, which Transource PA opposed and Stop Transource York County supported. The ALJs granted OCA's motion allowing intervenors until September 25, 2018 to submit their direct testimony (Third Prehearing Order, p. 10). The OCA then recommended that the remainder of the procedural schedule be extended so that reply briefs would be filed on April 17, 2019 (OCA Second Prehearing Memo, p. 11). Stop Transource York County supported extending the schedule (Tr. at pp. 1635-1636). Again, the Company opposed this extension of the schedule in order to avoid any delay in the Project's in-service date (Transource PA Second Prehearing Memo, p. 5; Tr. at p. 1625). On July 30, 2018, the ALJs issued an order adopting the OCA's recommendation and setting a new reply brief date of April 17, 2019.

The Company timely filed its rebuttal testimony on November 27, 2018 in accordance with the new procedural schedule. Under the existing procedural schedule, Stop Transource York County's surrebuttal testimony is due within 50 days of rebuttal, or on January 16, 2019. The Motion requests that the deadline for filing surrebuttal testimony be extended by an additional five months. Stop Transource York County has offered no reasonable basis for extending the schedule even further, and its Motion should be denied. Other parties have already argued for additional time and these arguments have resulted in the ALJs approving a delayed

procedural schedule providing additional time for the Stop Transource York County. Stop Transource York County should not be given additional time as a result of its own failure to conduct discovery or otherwise present its position on the issues in this proceeding.

H. The length of the procedural schedule in this case is already much longer as compared to other transmission line siting cases before the Commission.

The procedural schedule in this case is unprecedentedly long when compared to other transmission line cases before the Commission. The initial procedural schedule adopted by the ALJs provided for a reply brief date that was over one year from the date of the Company's filing. In comparison, the reply brief date in the Susquehanna-Roseland proceeding was approximately 9 months after the filing date. See Docket No. A-2009-2082562. Likewise, in the Northeast Pocono proceeding, the reply brief date was approximately 8 ½ months after the filing date. See Docket No. A-2012-2340872. Even considering transmission line cases in which there was no requirement that the Commission issue a decision within one year from the date of the original application, these other cases were decided much faster than the current procedural schedule in this case allows. For example, in the case of Trans-Allegheny Interstate Line, Docket No. A-110172, the reply brief date was approximately eleven months after the application was filed. With respect to Pennsylvania Electric Company's recent Application for the Bedford North - Central City West 115 kV Transmission Line, the reply brief date was approximately ten months after the application was filed.

As a result of the continuous requests by other parties to delay the procedural schedule, the existing schedule in this case is now significantly longer. The existing schedule is as follows:

Other parties' testimony	September 25, 2018
Rebuttal testimony	November 27, 2018

Surrebuttal testimony	January 16, 2019
Written rejoinder	January 30, 2019
Evidentiary hearing	February 21-22, and February 25-March 1, 2019
Main Briefs	March 28, 2019
Rely Briefs	April 17, 2019

The reply brief date provided for in the current schedule is now approximately fourteen months after the Company filed its Application. Stop Transource York County's most recent request would delay this proceeding even further, by at least an additional five months, such that the reply brief date would be approximately nineteen months after the Company filed its Application. Stop Transource York County's request is so unreasonable that it now seeks approximately triple the time it would have been allowed under the existing schedule to prepare its surrebuttal testimony. Stop Transource York County has failed to offer a reasonable explanation as to why the Company's Siting Application should proceed at far slower pace before the Commission than other transmission line cases of comparable magnitude.

I. Stop Transource York County's request to delay the schedule each time the Project is reevaluated would ultimately serve as a complete bar to any project ever being built.

As support for its requested extension, Stop Transource York County argues that new information concerning the Project's reliability benefits was made available following the September 2018 TEAC, as addressed in the Company's rebuttal testimony (Motion, pp. 7-10). According to Stop Transource York County, this updated information warrants additional time to prepare its surrebuttal testimony. If this position were accepted, other parties could use this argument to delay the Project in perpetuity.

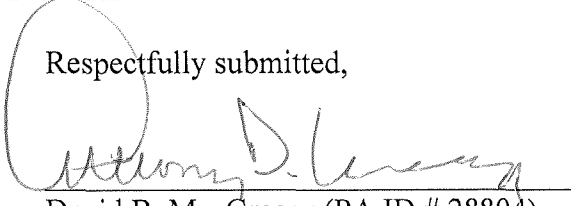
If procedural schedules were delayed every time updated information became available regarding a proposed project, the merits of transmission line cases would never be decided, and

no new project would ever be built. This is because additional information is constantly available. As explained in the Company's direct testimony submitted on December 27, 2017, "to assume that projects selected by the PJM Board for market efficiency continue to be economically beneficial, both the costs and benefits of these projects will be reviewed periodically (normally on annual basis)" (Transource PA St. No. 3, p. 23). Due to this, and the time required for the regulatory approval process, no project will be built under exactly the same transmission system conditions that existed when the project was introduced. PJM has re-evaluated Project 9A consistent with the process described in the Company's direct testimony multiple times, namely September 2017, February 2018, and September 2018. Each time PJM has determined that the Project is needed. The Company, along with PJM, have performed multiple studies and sensitivity analyses as outlined in direct and rebuttal testimony to address anticipated changes. Other parties' continued requests to delay this proceeding are prejudicial to Transource PA because they attempt to thwart a final Commission decision on the merits.

IV. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that Stop Transource York County's Motion to Amend the Procedural Schedule be denied.

Respectfully submitted,



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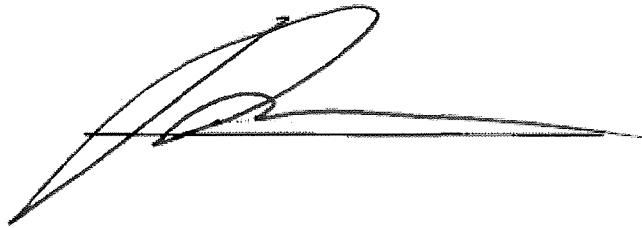
Date: December 13, 2018

Attorneys for Transource Pennsylvania, LLC

VERIFICATION

I, Brian D. Weber, being the Managing Director Transmission Development at American Electric Power hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: December 13, 2018

A handwritten signature in black ink, appearing to be "Brian D. Weber", written over a horizontal line.