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File #: 166570

February 11, 2019

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**

**Petitions of Transource Pennsylvania, LLC for a finding that a building to shelter control equipment at the Rice Substation in Franklin County, Pennsylvania and the Furnace Run Substation in York County, Pennsylvania are reasonably necessary for the convenience or welfare of the public
Docket Nos. P-2018-3001878 & 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:

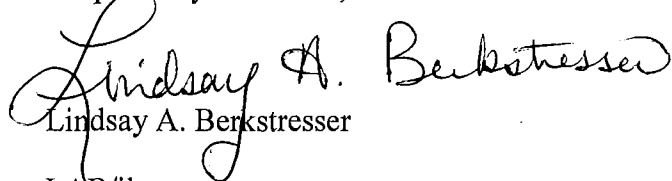
Enclosed for filing is the Motion of Transource Pennsylvania, LLC for Admission *Pro Hac Vice* in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Rosemary Chiavetta, Secretary

February 11, 2019

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Respectfully submitted,


Lindsay A. Berkstresser

LAB/jl

Enclosures

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

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).

VIA E-MAIL & FIRST CLASS MAIL

Dianne E. Dusman, Esquire
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*Maple Lawn Farms, Inc., Rose Tree-Blue
Mountain Hunt Club, Inc. &
Citizens to STOP Transource*

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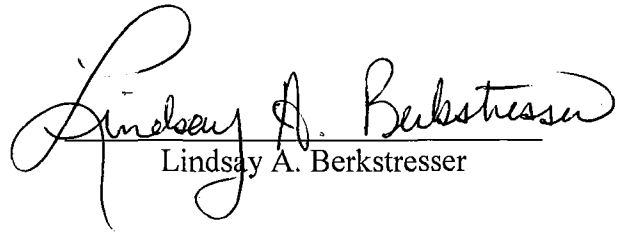
Jan & Georgiana Horst
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Darwyn Benedict
410 N. Grant Street
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Delores Krick
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Airville, PA 17302

Clint Bairdoll
Owls Club, Inc.
87 West Main Street
Waynesboro, PA 17268

Date: February 11, 2019


Lindsay A. Berkstresser

**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	:	

**MOTION OF TRANSOURCE PENNSYLVANIA, LLC FOR
ADMISSION *PRO HAC VICE***

TO ADMINISTRATIVE LAW JUDGES ELIZABETH BARNES AND ANDREW CALVELLI:

Pursuant to Section 5.103 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.103, and Rule 301(b) of the Pennsylvania Bar Admission Rules, Counsel of Record for Transource Pennsylvania, LLC (“Transource PA” or

the “Company”), Anthony D. Kanagy, Esq., respectfully requests that Your Honors enter an Order granting admission *pro hac vice* to Christopher S. Gunderson, Esq., as counsel for Transource PA for all purposes in relation to these proceedings (“Motion”). In support thereof, the Movant, Anthony D. Kanagy, avers as follows:

1. Pursuant to Section 1.24(b)(1) of the Commission’s regulations, 52 Pa. Code § 1.24(b)(1), the Movant has entered his appearance as counsel of record for Transource PA in this proceeding, is an active member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 85522), and is a Principal with Post & Schell, P.C., whose principal office is in Philadelphia, Pennsylvania.

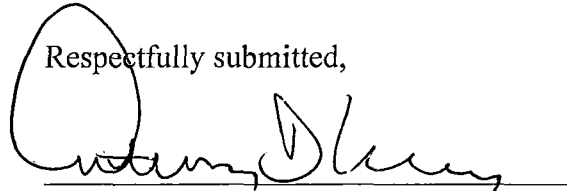
2. Christopher S. Gunderson is an attorney with Venable LLP, 750 E. Pratt Street, Baltimore, Maryland 21202.

3. Mr. Gunderson is a 2003 graduate of the University of Maryland Francis King Carey School of Law. He has been a member in good standing of the Bar of Maryland since 2003.

4. Mr. Gunderson has experience and particular expertise in various aspects of regulatory and energy law, including issues related to electric transmission service and has appeared in numerous proceedings before the Maryland Public Service Commission. Mr. Gunderson has represented utility clients in regulatory matters for the past 7 years. Mr. Gunderson currently serves as counsel for Transource PA’s affiliate, Transource Maryland, in a related proceeding before the Maryland Public Service Commission.

5. Wherefore, Anthony D. Kanagy, Movant and Counsel of Record for Transource PA, respectfully moves for admission of Christopher S. Gunderson, *pro hac vice*, on behalf of Transource PA for all permissible purposes in relation to these proceedings.

Respectfully submitted,



Amanda Riggs Conner (D.C. ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613

David B. MacGregor (PA ID # 28804)
Anthony D. Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID #318370)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970

Date: February 11, 2019

Counsel for Transource Pennsylvania, LLC

**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	:	
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public	:	
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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	:	

**VERIFIED STATEMENT OF ANTHONY D. KANAGY,
SPONSOR OF CHRISTOPHER S. GUNDERSON,
FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Anthony D. Kanagy, Esq., a member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 85522), is moving for the admission *pro hac vice* of Christopher S. Gunderson, Esq. in the

above-captioned proceeding. In support of the Motion, I, the sponsor, submit this verified statement pursuant to Pa. R.C.P. 1012.1:

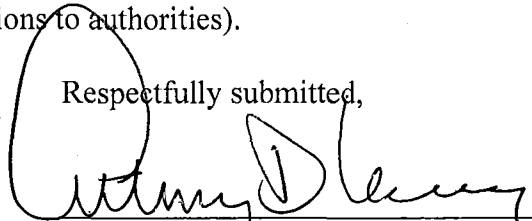
1. I have had sufficient opportunity to conduct a reasonable investigation regarding Mr. Gunderson and can state that he is a reputable and competent attorney.

2. Any proceeds from the settlement of a cause of action in which the candidate is granted admission *pro hac vice* shall be received, held, distributed, and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

3. I shall remain the attorney of record in this case, as required by the Rules of Civil Procedure.

4. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information, and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

Respectfully submitted,



Anthony D Kanagy (PA ID # 85522)

Post & Schell, P.C.

17 North Second Street

12th Floor

Harrisburg, PA 17101-1601

Phone: 717-731-1970

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Date: February 11, 2019

**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
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East and West Projects in portions of Franklin	:	
and York Counties, Pennsylvania	:	
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Petition of Transource Pennsylvania, LLC for a	:	
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County, Pennsylvania is reasonably necessary	:	
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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	:	

**VERIFIED STATEMENT OF CHRISTOPHER S. GUNDERSON
FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Anthony D. Kanagy, Esq., a member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 85522), is moving for my admission *pro hac vice* in the above-captioned proceeding. In

support of the said sponsor's Motion, I, the candidate, submit this verified statement pursuant to Pa. R.C.P. 1012.1:

1. I am admitted to practice in and am a member of good standing in the Bar of the Maryland, having been admitted in 2003. I have never been suspended, disbarred, or otherwise disciplined nor am I currently the subject of any disciplinary proceeding.

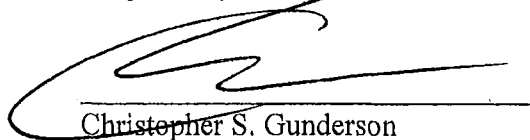
2. I shall comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

3. I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during my appearance in the matter for which admission *pro hac vice* is being sought.

4. I consent to the appointment of the sponsoring attorney, Anthony D. Kanagy, Esq., as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in the matter for which admission *pro hac vice* is sought.

5. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information, and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

Respectfully submitted,



Christopher S. Gunderson

Date: February 11, 2019