



17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Lindsay A. Berkstresser

lberkstresser@postschell.com
717-612-6021 Direct
717-731-1977 Direct Fax
File #: 166570

February 14, 2019

VIA HAND DELIVERY

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

RECEIVED
2019 FEB 14 PM 2:14
PA PUC
SECRETARY'S BUREAU
FRONT DESK

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

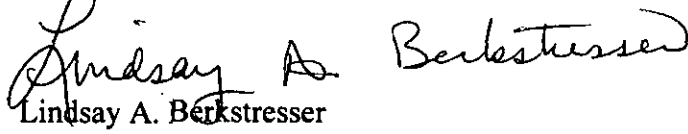
Application of Transource Pennsylvania, LLC for approval to acquire a certain portion of the lands of various landowners in York and Franklin Counties, Pennsylvania for the siting and construction of the 230 kV Transmission Lines associated with the Independence Energy Connection - East and West Projects 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 Transource Pennsylvania, LLC Request for Expedited Deposition, Notice of Deposition and Request for Production of Documents to PPL Electric Utilities Corporation in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Rosemary Chiavetta, Secretary
February 14, 2019
Page 2

Respectfully submitted,


Lindsay A. Berkstresser

LAB/jl
Enclosures

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

RECEIVED
2019 FEB 14 PM 2:15
PA PUC
SECRETARY'S BUREAU
FRONT DESK

**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	:	

**TRANSOURCE PENNSYLVANIA, LLC REQUEST FOR EXPEDITED
DEPOSITION, NOTICE OF DEPOSITION AND REQUEST FOR PRODUCTION OF
DOCUMENTS TO PPL ELECTRIC UTILITIES CORPORATION**

Transource Pennsylvania, LLC (“Transource PA”, or the “Company”) hereby gives notice of intent to depose PPL Electric Utilities Corporation (“PPL”) and requests the production of documents with respect to the above-captioned proceeding. **Transource PA hereby requests that PPL witness Shadab Ali be made available to testify at deposition regarding the**

matters described in this Notice on an expedited basis on February 20, 2019. In addition, to the extent that Mr. Ali does not have sufficient information or knowledge of the subjects identified in Paragraph 8 below, Transource PA requests that PPL identify the appropriate person(s) and also make them available for deposition on the same date. Transource PA further requests that the identified individual(s) be made available for depositions at PPL's place of business in Allentown, PA on February 20, 2019. In support hereof, and consistent with the procedures set forth in Sections 5.322, 5.343, 5.344, and 5.349 of the Commission's regulations, 52 Pa. Code §§ 5.322, 5.343, 5.344 and 5.349, Transource PA states as follows:

1. On December 27, 2017, Transource PA filed Applications for Approval of the Siting and Construction of 230 kV Transmission Lines in Portions of York County at Docket No. A-2017-2640195 ("IEC-East Project") and in portions of Franklin County at Docket No. A-2017-2640200 ("IEC-West Project") (collectively, the "Independence Energy Connection Project" or "IEC Project").

2. On March 9, 2018, PPL filed a Nunc Pro Tunc Petition to Intervene. In its Petition to Intervene, PPL referenced an existing PPL right-of-way on its Otter Creek-Conastone line, which substantially parallels the proposed IEC-East Line.

3. On October 2, 2018, Transource PA issued Set I interrogatories to PPL inquiring into the nature of PPL's existing facilities and right-of-way and whether PPL viewed its existing facilities as a possible alternative to the IEC Project. PPL's responses were of the general nature that it had not conducted any analysis to determine whether its existing facilities could serve as an alternative to the IEC Project.

4. PPL did not submit any testimony in this proceeding until January 30, 2019, the due date for surrebuttal testimony. On January 30, 2019, PPL served the surrebuttal testimony of Shadab Ali, Transmission Planning Supervisor for PPL Electric.

5. In Mr. Shadab Ali's testimony, PPL made various allegations regarding use of PPL's existing facilities as an alternative to the proposed Project.

6. Transource PA notes that Section 5.343 of the Commission's regulations, 52 Pa. Code § 5.343, provides for a 20-day notice period for conducting depositions. Transource PA served additional discovery questions to PPL on February 1, 2019 (two days after PPL submitted its Surrebuttal testimony). PPL responded to these discovery questions on February 11, 2019, however, the answers were non-responsive, and PPL also withheld providing certain information. A copy of PPL's responses are provided as Attachment A. Transource PA has also filed a Motion to Compel PPL to provide further responses to certain of the discovery questions. However, given: (1) the litigation schedule in this proceeding, with hearings scheduled to begin on February 21, 2019, (2) the fact that PPL waited until the surrebuttal stage to present testimony and did not update previously served discovery requests with the information it presented in surrebuttal testimony, and (3) PPL's answers to Transource PA Set II are non-responsive, Transource PA requests that PPL be ordered to make Mr. Shadab Ali available for deposition on an expedited basis on February 20, 2019.

7. The regulations provide for parties to object to a Notice of Deposition in 10 days. 52 Pa. Code § 5.343(f). Given the circumstances, Transource PA requests that the 10 day written response period be waived and that the ALJ hold a conference call on or about February 19, 2019 with the parties to discuss this issue.

8. Transource PA intends to inquire into: (i) the subjects addressed in Mr. Ali's Surrebuttal testimony that was served on January 30, 2019; (ii) subjects addressed in discovery questions and requests for admissions served on PPL Electric by Transource PA and the Office of Consumer Advocate in the above-referenced proceeding; and (iii) other issues related to the feasibility or lack thereof of using existing PPL's rights of way as a substitute for all or part of the IEC Project.


9. Pursuant to Sections 5.343(d) and 5.349 of the Commission's regulations, 52 Pa. Code §§ 5.343(d) and 5.349, Transource PA requests that the deponent(s) provide at the deposition copies of correspondence, corporate minutes, investor disclosures, e-mail messages, studies, and analyses that exist related to the subjects identified in Paragraph 8 that have not yet been provided to Transource PA.

10. Transource PA proposes that the depositions be held at PPL's offices at Two North, Ninth Street, Allentown, PA 18101-1179. Transource PA further requests that the deponent(s) be made available for deposition on February 20, 2019, consistent with the procedural schedule established in this case.

11. Transource PA requests that PPL respond to this Notice, and confirm that Mr. Ali and other individual(s), if applicable, will be made available for deposition by 10:00 a.m. on February 20. Transource PA further requests that such response be made to Hector Garcia, hgarcial@aep.com, 1 Riverside Plaza, Columbus, OH 43235, telephone (614) 716-3410, counsel for Transource PA.

12. As PPL is a participant in the above-referenced proceeding, a formal subpoena is unnecessary. Therefore, for the reasons set forth above, Transource PA requests that PPL Electric Utilities Corporation submit to a deposition pursuant to this notice.

Respectfully submitted,


Amanda Riggs Conner (DC 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
E-mail: arconner@aep.com
E-mail: hgarcia@aep.com

RECEIVED
2019 FEB 14 PM 2:15
PA PUC
SECRETARY'S BUREAU
FRONT DESK

**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	:	

**TRANSOURCE PENNSYLVANIA, LLC REQUEST FOR EXPEDITED
DEPOSITION, NOTICE OF DEPOSITION AND REQUEST FOR PRODUCTION OF
DOCUMENTS TO PPL ELECTRIC UTILITIES CORPORATION**

Application granted. So Ordered this _____ day of February, 2019.

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
Darryl Lawrence, Esquire
Phillip D. Demanchick, Esquire
David T. Evrard, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

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

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

Jordan B. Yeager, Esquire
Mark L. Freed, Esquire
Joanna A. Waldron, Esquire
Curtin & Heefner LLP
2005 S. Easton Road, Suite 100
Doylestown, PA 18901
Stop Transource Franklin County

Teresa K. Harrold, Esquire
FirstEnergy Service Company
2800 Pottsville Pike
PO Box 16001
Reading, PA 19612-6001
MAIT

Kimberly A. Klock, Esquire
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
PPL Electric Utilities Corporation

Karen O. Moury, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
*Maple Lawn Farms, Inc., Rose Tree-Blue
Mountain Hunt Club, Inc. &
Citizens to STOP Transource*

Thomas J. Sniscak, Esquire
Whitney E. Snyder, Esquire
100 North Tenth Street
Harrisburg, PA 17101
York County Planning Commission

Linus E. Fenicle, Esquire
Reager & Adler, PC
2331 Market Street
Camp Hill, PA 17011
Quincy Township

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

John L. Munsch, Esquire
800 Cabin Hill Drive
Greensburg, PA 15601
MAIT & West Penn Power

RECEIVED
2019 FEB 14 PM 2:15
PA PUC
SECRETARY'S BUREAU
FRONT DESK

VIA FIRST CLASS MAIL

Byron Jess Boyd
831 New Park Road
New Park, PA 17352

Hugh McPherson
2885 New Park Road
New Park, PA 17352

J Ross McGinnis, Esquire
41 West Main Street
Fawn Grove, PA 17321

Fred Byers
1863 Coldsmith Rd
Shippensburg, PA 17257

Michael Cordell
4219 Altenwald Rd
Waynesboro, PA 17268

Roy Cordell
Emma Cordell
4690 Fetterhoff Chapel Road
Chambersburg, PA 17202

Aaron Kauffman
Melinda Kauffman
4220 Old Scotland Rd
Chambersburg, PA 17202

Colt Martin
Kristyn Martin
8020 Hidden Valley Rd
Waynesboro, PA 17268

Leonard Kauffman
Mary Kauffman
4297 Olde Scotland Rd
Chambersburg, PA 17202

Allen Rice
Lori Rice
1430 Henry Lane
Chambersburg, PA 17202

Lois White
1406 Walker Road
Chambersburg, PA 17202

Willa Weller Kaal
67 Summer Breeze Lane
Chambersburg, PA 17202

Allan Stine
Heather Stine
867 Cider Press Road
Chambersburg, PA 17202

Karen Benedict
Rodney Myer
5413 Manheim Rd
Waynesboro, PA 17268

Lantz Sourbier
Laura Sourbier
64 Edgewood Cir
Chambersburg, PA 17202

Ashley Hospelhorn
8010 Hidden Valley Ln
Waynesboro, PA 17268

Ashley Hospelhorn
116 West 3rd Street
Waynesboro, PA 17268

Danielle Bernecker
1827 Wood Duck Dr E
Chambersburg, PA 17202

Courtney & Derek Dettinger
24 Chanceford Rd
Brogue Pa 17309

Jan & Georgiana Horst
826 New Franklin Road
Chambersburg, PA 17201

James McGinnis, Jr.
290 Woolen Mill Road
New Park, PA 17352

Delores Krick
Muddy Creek Meadows Riding Stable
699 Frosty Hill Road
Airville, PA 17302

Darwyn Benedict
410 N. Grant Street
Waynesboro, PA 17268

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

Date: February 14, 2019



Hector Garcia

RECEIVED
2019 FEB 14 PM 2:15
PA PUC
SECRETARY'S BUREAU
FRONT DESK