

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560

FAX (717) 783-7152  
consumer@paoca.org

April 5, 2019

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

Re: Application of Transource Pennsylvania, LLC 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 York and Franklin Counties, Pennsylvania.

Docket Nos. A-2017-2640195 and 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 Run 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 Line 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 No. A-2018-3001881, *et al.*

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set XXXV in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within ten (10) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses

April 5, 2019

Page 2

to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultants, as listed below:

Peter J. Lanzaotta  
Lanzaotta & Associates LLC  
14250 Royal Harbour Court, #914  
Fort Myers, FL 33908  
petelanz@lanzalotta.com

Geoffrey Crandall  
Jerry E. Mendl  
MSB Energy Associates, Inc.  
6907 University Avenue  
Suite #162  
Middleton, WI. 53562  
mendl@msbnrg.com  
crandall@msbnrg.com

Scott J. Rubin  
333 Oak Lane  
Bloomsburg, PA. 17815  
scott.j.rubin@gmail.com

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,

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

Enclosures

cc: PUC Secretary Chiavetta, (letter and Certificate of Service only)  
Certificate of Service

\*269086

CERTIFICATE OF SERVICE

Application of Transource Pennsylvania, LLC  
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 York and Franklin Counties, Pennsylvania.

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.

P-2018-3001878

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

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 Line  
associated with the Independence Energy Connection –  
East and West Projects as necessary or proper for the service,  
accommodation, convenience or safety of the public.

A-2018-3001881,  
*et al.*

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Interrogatories Set XXXV, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 5<sup>th</sup> day of April 2019.

SERVICE BY E-MAIL and FIRST CLASS MAIL

Anthony D. Kanagy, Esq.  
Lindsay Berkstresser, Esq.  
David B. MacGregor, Esq.  
Post & Schell PC  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601

Amanda Riggs Conner, Esq.  
Antonio Smyth, Esq.  
Hector Garcia, Esq.  
American Electric Power Service  
1 Riverside Plaza  
29<sup>th</sup> Floor  
Columbus, OH 43215

Thomas J. Sniscak  
Whitney E. Snyder  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101

Teresa K. Harrold, Esq.  
Tori L. Giesler, Esq.  
First Energy  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, PA 19612

Linus E. Fenicle, Esq.  
Reager & Adler, P.C.  
2331 Market Street  
Camp Hill, PA 17011

Jordan B. Yeager, Esq.  
Mark L. Freed, Esq.  
Joanna A. Waldron, Esq.  
Curtain & Heefner LLP  
2005 S. Easton Road  
Suite 100  
Doylestown, PA 18901

Karen O. Maury  
Eckert, Seamans, Cherin, & Mellott, LLC  
213 8<sup>th</sup> Floor  
Harrisburg, PA 17101

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

Kimberly A. Klock, Esq.  
Michael J. Shafer, Esq.  
PPL Electric Utilities Corporation  
Two North Ninth Street  
Allentown, PA 18101

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

J. Ross McGinnis, Esq.  
41 W. Main Street  
Fawn Grove, PA 17321

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

SERVICE BY FIRST CLASS MAIL

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

Fred Byers  
1863 Coldsmith Rd  
Shippensburg, PA 17257

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 3<sup>rd</sup> Street  
Waynesboro, PA 17268

Danielle Bernecker  
1827 Wood Duck Dr E  
Chambersburg, PA 17202

Derek Dettinger  
24 Chanceford Rd  
Brogue, PA 17309

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

Hugh McPherson  
2885 New Park Road  
New Park, PA 17352

Michael Cordell  
4219 Altenwald Rd  
Waynesboro, PA 17268

Darwyn Benedict  
410 N. Grant Street  
Waynesboro, PA 17268

Jan & Georgina Horst  
826 New Franklin Road  
Chambersburg, PA 17202

Dolores Krick  
S. J. Krick & Co. Inc  
Krick's Apartments  
Muddy Creek Meadows Riding Stable  
699 Frosty Hill Rd  
Airville PA 17302

/s/ Darryl A. Lawrence  
Darryl A. Lawrence  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 93682  
E-Mail: [DLawrence@paoca.org](mailto:DLawrence@paoca.org)

Phillip D. Demanchick  
Assistant Consumer Advocate  
PA Attorney I.D. # 324761  
E-Mail: [PDemanchick@paoca.org](mailto:PDemanchick@paoca.org)

David T. Evrard  
Assistant Consumer Advocate  
PA Attorney I.D. # 33870  
E-Mail: [DEvrard@paoca.org](mailto:DEvrard@paoca.org)

Dianne E. Dusman  
Senior Assistant Consumer Advocate  
PA Attorney I.D. #38308  
E-Mail: [DDusman@paoca.org](mailto:DDusman@paoca.org)

Counsel for:  
The Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
\*269846