


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

 @pa_oca

 /pennoca

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

June 28, 2019

Anthony D. Kanagy, Esquire
Lindsay Berkstresser, Esquire
David B. MacGregor, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

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, 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 Nos. A-2018-3001881, *et al.*

Dear Counsel:

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

Anthony D. Kanagy, Esquire
Lindsay Berkstresser, Esquire
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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 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 consultant, as listed below:

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

Respectfully submitted,



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
*275413

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 :
 :
 : Docket Nos. A-2017-2640195
 : A-2017-2640200
 :
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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 Nos. A-2018-3001881
 : *et al.*
 :
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I hereby certify that I have this day served a true copy of the foregoing, the Office of Consumer Advocate’s Interrogatories to Transource Pennsylvania, LLC, Set XLII, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 28th day of June 2019.

SERVICE BY E-MAIL and FIRST CLASS MAIL, POSTAGE PREPAID

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

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

Anthony D. Kanagy, Esquire
Lindsay Berkstresser, Esquire
David B. MacGregor, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

Teresa K. Harrold, Esquire
Tori L. Giesler, Esquire
FirstEnergy
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612

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

Karen O. Moury, Esquire
Eckert, Seamans, Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101

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

Amanda Riggs Connor, Esquire
Antonio Smyth, Esquire
Hector Garcia, Esquire
American Electric Power Service
1 Riverside Plaza, 29th Floor
Columbus, OH 43215

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

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

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

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

SERVICE BY FIRST CLASS MAIL, POSTAGE PREPAID

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

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

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

Fred Byers
1863 Coldsmith Road
Shippensburg, PA 17257

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

Allen Rice
Lori Rice
1430 Henry Lane
Chambersburg, PA 17202

Lois White
1406 Walker Road
Chambersburg, PA 17202

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

Danielle Bernecker
1827 Wood Duck Drive E
Chambersburg, PA 17202

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

Michael Cordell
4219 Altenwald Road
Waynesboro, PA 17268

Lantz Sourbier
Laura Sourvier
64 Edgewood Circle
Chambersburg, PA 17202

Ashley Hospelhorn
8010 Hidden Valley Lane
Waynesboro, PA 17268

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

/s/ Darryl A. Lawrence

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

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

Willa Weller Kaal
67 Summer Breeze Lane
Chambersburg, PA 17202

Karen Benedict
Rodney Myers
5413 Manheim Road
Waynesboro, PA 17268

Derek Dettinger
24 Chanceford Road
Brogue, PA 17309

Hugh McPherson
2885 New Park Road
New Park, PA 17352

Darwyn Benedict
410 North Grant Street
Waynesboro, PA 17268

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

Ashley Hospelhorn
116 West Third Street
Waynesboro, PA 17268

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

David T. Evrard
Assistant Consumer Advocate
PA Attorney I.D. # 33870
E-Mail: DEvrard@paoca.org
*275414

Counsel for:
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
Dated: June 28, 2019