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January 31, 2020

***VIA EFILING***

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
Commonwealth Keystone Bldg.  
400 North Street  
Harrisburg, PA 17120

**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 230kV Project in Portions of Franklin County, Pennsylvania  
Docket No. 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 and necessary for the convenience or welfare of the public  
Docket No. P-2018-3001883**

**Application of Transource Pennsylvania, LLC filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230kV Transmission Line Associated with the Independence Energy Connection-East Project in Portions of York County, Pennsylvania  
Docket No. A-2017-2640195**

**Application of Transource Pennsylvania, LLC for approval to acquire a certain portion of 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.**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
January 31, 2020  
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Dear Secretary Chiavetta:

Enclosed for filing on behalf of Stop Transource Franklin County, please find the Status Report pursuant to the Twelfth Prehearing Order. Copies will be served as indicated on the Certificate of Service.

Thank you for your help in this matter.

Sincerely,



Joanna A. Waldron, Esq.  
CURTIN & HEEFNER LLP  
*Counsel for Stop Transource Franklin County*

JAW:bya  
Enclosure

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

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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.*

**STATUS REPORT OF STOP TRANSOURCE FRANKLIN COUNTY**

Stop Transource Franklin County (“STFC”), by and through its attorneys, respectfully  
files this Status Report pursuant to the Twelfth Prehearing Order dated November 7, 2019 in the  
above-referenced Applications of Transource Pennsylvania, LLC (“Transource”) and related  
proceedings.

Transource and PPL Electric Utility Corporation (“PPL Electric”) jointly filed an  
Amendment to the above-referenced Application on January 29, 2020. STFC respectfully notes

that STFC has only been able to conduct a preliminary review of PPL & Transource's filing two days ago.

The Twelfth Prehearing Order requested an update on the following:

**a) The status of the Joint/Amended Application(s) for the East Project.**

Transource and PPL filed a Joint Amended Application on January 29, 2020 (hereinafter "Joint Amended Application"). The Joint Amended Application includes thirteen (13) Supplements to Attachments, Supplemental Testimony from four (4) witnesses who previously provided written and oral testimony in this case (Brian Weber, Steven R. Herling, Timothy J. Horger, and Barry Baker), and new written testimony from four (4) additional witnesses (Douglas J. Grossman, Matthew Baranoski, Kyle Swartzentruber, and Austin K. Weseloh). The new statements also include multiple exhibits, several of which are from PJM and generated in December 2019.

**b) The need, if any, to conduct additional discovery for the East Project, including the estimate of the types of discovery and the timing to complete such discovery;**

STFC anticipates that it will need additional discovery, for example, on the testimony and documents relating to PJM, project costs and benefits. With some of the statements and exhibits coming from non-parties to the application, we anticipate that this will take two rounds of discovery, which can begin now that the Joint Amended Application has been filed.

**c) The status of the settlement discussions for the West Project;**

After some initial settlement discussions with Transource, STFC does not anticipate a resolution by settlement with respect to the IEC Independence Project at this time. However, STFC has not had any settlement discussions with PPL, nor any discussions with Transource since the filing of the Joint Amended Application.

**d) The need, if any, to conduct additional evidentiary hearings on the reliability issues, including a proposed date or dates for any such hearings.**

STFC anticipates that additional evidentiary hearing dates are necessary on the reliability issues and the new issues identified in the Joint Amended Application, Supplements to Attachments and the 8 new witness statements. While the extent of time necessary will be subject to change based on the results of discovery, STFC notes that the parties have not cross-examined certain witnesses on the previously-stricken reliability testimony, and we continue to anticipate that some hearing time would be necessary for that cross examination. As such, at this early date, STFC proposes that the parties reserve May 19 and May 20 as hearing dates, subject to Your Honors' and witness availability. STFC is also available May 26 and May 27, and June 23 through June 26, 2020.

**e) Any other procedural issues that the Parties need to address**

STFC respectfully suggests that the Parties may need to address procedural changes to allow Your Honors the opportunity to consider legal standards, arguments and evidence opposing any proposed partial settlements.

CURTIN & HEEFNER LLP



By: \_\_\_\_\_

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Dated: January 31, 2020

## CERTIFICATE OF SERVICE

### Consolidated Docket Nos. A-2017-2640200 and A-2017-2640195

I hereby certify that a true and correct copy of the Status Report of Stop Transource Franklin County 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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Date: January 31, 2020