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February 19, 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
February 19, 2020
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Dear Secretary Chiavetta:

Enclosed for filing on behalf of Stop Transource Franklin County, please find Answer to the Joint Amended Application of Transource Pennsylvania, LLC and PPL Electric Utilities Corporation. 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	:	
Filed Pursuant to 52 Pa. Code Chapter 57,	:	Docket No. A-2017-2640200
Subchapter G, for Approval of the Siting and	:	
Construction of the 230 kV Transmission Line	:	
Associated with the Independence Energy	:	
Connection-West Project in Portions of	:	
Franklin County, Pennsylvania	:	

**STOP TRANSOURCE FRANKLIN COUNTY’S ANSWER TO THE JOINT AMENDED
APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC AND PPL ELECTRIC
UTILITIES CORPORATION**

Pursuant to 52 Pa. Code § 5.65, Stop Transource Franklin County (“STFC”) hereby answer the Joint Amended Application of Transource Pennsylvania LLC and PPL Electric Utilities Corporation as follows:

I. INTRODUCTION

The Joint Amended Application comes years after Transource’s original filing with the Public Utility Commission (“Commission”) for approval of siting and construction of two transmission lines, and two substations, one set in Franklin County and one set in York County. The ALJs and parties have already conducted six public input hearings, three days of site visits, and several years of discovery, along with four days of evidentiary hearings. On January 29, 2020, Transource PA and PPL filed this Joint Amended Application pursuant to certain settlement agreements with a handful of parties from York County to offer an alternative route for the proposed transmission lines through York County. STFC opposes the Joint Amended Application.

The PUC must conduct a formal investigation and evidentiary hearings to determine whether Transource and PPL satisfies the requirements of 52 Pa. Code § 57.75, including whether there is a need for the project, and whether the project, as reconfigured and expanded, meets the legal requirements. On information and belief, the Joint Amended Application fails to demonstrate sufficient evidence of present or future need, sufficient evidence that the proposed new facilities would lower the costs to customers, or sufficient evidence that the project benefits exceed its costs above PJM's required ratio.

The original Applications sought to construct 24.4 miles of transmission line in Franklin County, and 12.7 miles of transmission line in York County, for a combined total of 37.1 miles of transmission lines in Pennsylvania¹. The Joint Amended Application proposes the same 24.4 miles of transmission line in Franklin County, with no alteration to the length or location of the Franklin County transmission line, and no use of existing infrastructure. For York County, however, the length of transmission line has doubled, to 24 miles. PPL Supplemental Siting Study – Attachment 2 at p. 3 The Joint Amended Application proposes that two utilities use the alternative configuration to build nearly 50 miles of transmission line in Pennsylvania alone.

STFC opposes the Joint Amended Application arising from the settlement agreements, along with the pending original Applications, as well as Transource's Shelter Petitions and the Eminent Domain Applications, for both Franklin as well as York Counties.

II. BACKGROUND

1. Denied as stated. It is admitted only that Transource PA filed two Applications for the siting of electric transmission lines on December 27, 2017. The remaining averments are

¹ The Applications also proposed 4.4 miles of transmission line located in Washington County, Maryland, and 3.1 miles in Harford County Maryland

denied as stated. It is specifically denied that the 2017 Siting Applications and testimony of Transource witnesses “fully explained” any alleviation of alleged congestion constraints or provided reliability benefits. By way of further answer, on August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752. Application (West) at ¶ 18.

2. Admitted.

3. Admitted.

4. Admitted.

5. Admitted in part, denied in part. It is admitted only that a Notice of Prehearing Conference was issued and a Prehearing Conference Order was issued. The remaining averments are denied in that they reference writings which speak for themselves, such that any characterizations of them are improper.

6. Admitted with clarification. The York Citizens have engaged in limited discovery.

7. Denied as stated. It is admitted only that the ALJs issued an Order on March 28, 2018. The Order is a writing that speaks for itself, and therefore characterizations of it are improper and therefore, denied. By way of further answer, the ALJ’s issued an amended Order on April 4, 2018, which added over 60 individuals to the list of intervenors and protestors from Franklin County.

8. Denied in part, admitted in part. It is admitted only that Transource filed the Petitions on that date. The remaining averments of the paragraph are denied to the extent that they are characterization of a writings and/or a legal conclusion to which no responsive pleading is required.

9. Admitted in part, denied in part. It is admitted only that Transource filed the 133

eminent domain applications on May 15, 2018. By way of further answer, in Mach of 2018, Transource, as a public utility, Transource also filed in Franklin County Court of Common Pleas “93 of the original eminent domain applications related to properties in Franklin County. By way of further answer, on October 1, 2018, the ALJ’s issued an order withdrawing 48 eminent domain applications.

10. Admitted with clarification. By way of further answer, site views were held on three days, with two days in Franklin County on May 29 and 30th and one day in York County on June 1, 2018.

11. Admitted.

12. Denied as stated. It is admitted that STFC served direct testimony in accordance with the ALJ’s order.

13. Admitted.

14. Admitted in part, denied in part. It is admitted only that Transource submitted amended Applications on November 27, 2018. The remaining averments of Paragraph 14 are denied, as they refer to writings that speak for themselves, and characterizations of them are improper, and therefore, are denied.

15. Admitted.

16. Admitted.

17. Admitted in part, denied in part. It is admitted only that the ALJ’s issued an Order on December 28, 2018. The Order is a writing that speaks for itself, and any characterization of it is improper, and is therefore, denied. By way of further answer, the ALJ’s submitted a Seventh PreHearing Order on January 24, 2019 granting clarification on striking certain testimony.

18. Admitted.

19. Admitted in part, denied in part. It is admitted only that on February 11, 2019 Transource filed the Petition for Interlocutory Review and Answer to Material Questions. The remaining averments are denied. The Petition is a writing that speaks for itself and characterization of it are improper and are therefore, denied. By way of further answer, Transource filed the Petition with less than two weeks before the evidentiary hearing, ensuring that the parties would not have a Commission response on the then-stricken testimony before the evidentiary hearings.

20. Admitted.

21. Admitted.

22. Admitted.

23. Admitted, with clarification. Evidentiary hearings were held while the Transource's Petition for Interlocutory Review was pending before the Commission.

24. Admitted.

25. Admitted.

26. Admitted in part, denied in part. It is admitted only that Transource submitted testimony on May 14, 2019. The remaining averments of Paragraph 26 are denied, as the refer to writings that speak for themselves, and the characterization of that testimony is improper and therefore, denied.

27. Admitted with clarification. Testimony was served pursuant to Orders in the proceeding.

28. Admitted.

29. Admitted in part, denied in part. It is admitted only that Transource filed the

Motion. The remaining averments are denied, as they involve a writing that speaks for itself, and characterizations of it are improper, and therefore, denied.

30. Admitted.

31. Admitted in part, denied in part. It is admitted only that the ALJs canceled the further hearing scheduled for August 7 and 8, 2019. After reasonable investigation, STFC is without information sufficient to form a belief as to whether every part was engaged in settlement discussions, and therefore the remaining averments are denied.

32. Admitted in part, denied in part. It is admitted only upon information and belief that some of the parties continued to engage actively in settlement discussions, which resulted in Transource PA executing settlement agreements. The remaining averments refer to writings that speak for themselves, and characterization of them are improper and therefore denied. By way of further answer, the settlement agreements provide that Transource would not withdraw the original applications.

33. Admitted in part, denied in part. It is admitted only that the settlement agreements were filed on October 17, 2019. The remaining averments are denied because they reference writings that speak for themselves.

34. Admitted, upon information and belief.

35. Denied. The averments of paragraph 35 are legal conclusions to which no responsive pleading is required.

36. Admitted in part, denied in part. It is admitted only that Transource and PPL have submitted Attachments, which are writings that speak for themselves, the characterization of which are improper, and therefore are denied.

37. Admitted in part, denied in part. It is admitted only that Transource and PPL submitted written direct testimonies listed with the Amendment. The testimonies are writing which speak for themselves, and the characterization of them as “explain and supporting” is improper and therefore denied.

III. THE AMENDED APPLICATION PROPOSES A RECONFIGURATION OF THE EAST PORTION OF THE IEC PROJECT

38. Admitted in part, denied in part. It is admitted that certain parties and individuals raised the issue of using existing infrastructure in this proceeding. The remaining averments are denied, because after reasonable investigation, STFC is without information sufficient to form a belief as to the truth the requests in the MD PSC proceeding.

39. Admitted in part, denied in part. It is admitted only that proposed reconfigurations were discussed at the evidentiary hearing on the pages cited, as well as additional pages. The remaining averments are denied. STFC is without information sufficient to form as belief as to why non-party PJM “evaluated several proposed reconfigurations” and therefore, the remaining averments are denied.

40. Admitted in part, denied in part. It is admitted only that the overall levels of benefits for the reconfiguration as calculated by PJM are lower than the cost/benefit ratio and the level of benefits for the original configuration as calculated by PJM. The remaining averments are denied. By way of further answer, STFC is without information sufficient to form a belief as to what various parties in Maryland support, and why. By way of further answer still, it is denied that the original configuration of IEC East Portion of Project 9A would “resolve” reliability violations. By way of further answer, STFC denies that the calculations by PJM represent that there is a need for the IEC Project, East or West Portion, including with the

reconfigured East route, and, requests proof that the Amended Application is necessary to furnish service to the public and results in benefits to Franklin County, such as a reliability or lower prices. 66 Pa.C.S. § 1501 and 52 Pa. Code 57.75(e)(1) (See, e.g., Hess v. Pennsylvania PUC, 107 A.3d 246, 260 (Pa. Commw. Ct. 2014)(courts have found necessity wherever a project resulted in an improvement to the reliability of service or lower prices).

41. Admitted in part, denied in part. It is admitted only that Transource and PPL submitted the Joint Amended Application. The remaining averments are denied. STFC is without information sufficient to form a belief as to what “parties” support, and therefore, the averments are denied. The averments are also denied to the extent that they refer to writings that speak for themselves, the characterization of which is improper and must be denied.

IV. DESCRIPTION OF THE PROPOSED AMENDMENT

42. Denied as stated. It is admitted only that the Joint Applicants propose the reconfiguration of the East Portion. The remaining averments refer to writings which speak for themselves, and the characterization of them is improper and therefore denied.

43. Denied. The averments of Paragraph 43 refer to writings which speak for themselves, and the characterization of them is improper and therefore denied.

44. Admitted, upon information and belief.

45. Admitted, upon information and belief.

46. Admitted, upon information and belief.

47. Admitted, upon information and belief.

48. Admitted in part, upon information and belief, as to proposed length and use of rights-of-way, and denied in part. The averments are denied to the extent that they reference

writings that are speak for themselves, and any characterizations of them are improper and are therefore denied.

V. ENVIRONMENTAL ANALYSIS OF THE RECONFIGURED ROUTE

49. Admitted in part, denied in part. It is admitted only that some new infrastructure will be constructed, and that some existing infrastructure that is designed to hold additional circuits will be used. The remaining averments are denied. After reasonable investigation, STFC is without sufficient information to form a belief as to the environmental impacts of the reconfigured route or that replacing aged infrastructure will produce “minimal” environmental effects. Further, it is specifically denied that adding new circuits to existing towers “will have no detrimental environmental effects.”

50. Admitted in part, denied in part. It is admitted only that PPL provided a supplemental siting analysis as Supplemental Attachment 3, and supplemental statement of Baker. The remaining averments are denied, because, the allegations in this paragraph refer to writings that speak for themselves, and any characterizations of them are improper and are therefore denied. The averments are further denied because, after reasonable investigation, STFC is without sufficient knowledge or information to form a belief as to the truth of the averments, and such averments are therefore denied.

VI. RIGHTS-OF-WAY

51. Admitted in part, denied in part. It is admitted only that the reconfiguration uses existing infrastructure. The remaining averments are denied. By way of further answer, STFC is without information sufficient to form a belief as to the truth of the assertions as to what Transource intend to do with the eminent domain applications. By way of further answer, the

Joint Amended Application does not eliminate the need for any eminent domain applications filed in conjunction with the West Portion of the pending Application. Further, more than a third of the landowners on the West Portion require eminent domain applications. *See* January 31, 2020 Status Report of Transource.

52. Admitted, upon information and belief.

53. Denied. STFC is without information upon information and belief.

54. Denied. STFC is without information upon information and belief.

55. Admitted with clarification. It is admitted only that a list of landowners was provided in Supplemental Attachment 5, and that maps were provided showing 134 segments properties traversed by the right-of-way in Supplemental Attachment 3. The “proposed route” refers only to the reconfigured York County portion of the Application, and does not identify landowners or segments on the West (Franklin County) portion.

56. Denied. The averments of Paragraph 56 are legal conclusions to which no responsive pleading is required, and the averments are, therefore, denied.

VII. THE RECONFIGURATION OF THE EAST PORTION OF THE IEC PROJECT

57. Denied. The averments of Paragraph 57 are legal conclusions to which no responsive pleading is required, and the averments are, therefore, denied. By way of further answer, it is specifically denied that the Joint Amended Application is “in the public interest” or that it is “necessary and proper for the service, accommodation, convenience or safety of public.” It is further denied that the Amended Joint Application resolves any alleged “congestion issues identified by PJM.” By way of further answer, doubling the length of transmissions lines to an alternative configuration, which applicants concede does not alleviate congestion costs “to as

great of extent as the IEC Project as originally proposed” is not in the public interest.

Transource’s original Applications sought to construct 24.4 miles of transmission line in Franklin County, and 12.7 miles of transmission line in York County, combining for 37.1 miles of transmission lines in Pennsylvania². The Amended Application proposes the same 24.4 miles of transmission line in Franklin County, with no alteration to the length or location of the Franklin County transmission line. For York County, however, the length of transmission line has doubled, to 24 miles. PPL Supplemental Siting Study – Attachment 2 at p. 3.

VII. NOTICE AND HEARING

58. Admitted with clarification. It is admitted only that notice of the Prehearing was published in the Pennsylvania Bulletin.

59. Denied as stated. It is admitted only that Transource and PPL have requested a hearing on the week of February 17, 2020. The remaining averments are denied. By way of further response, STFC denies that the date will give sufficient time to address prehearing issues.

WHEREFORE, STFC requests that this Commission deny the Joint Amended Application, the Zoning Petitions, and the associated Condemnation Applications as set forth in its Opposition and Prayer for Relief Below.

OPPOSITION AND PRAYER FOR RELIEF

60. STFC represents the interests of its members to ensure that the proposed siting and construction is in compliance with the applicable statutes and regulations providing for the protection of the natural resources of the Commonwealth under 52 Pa. Code § 57.76(a)(3).

61. STFC advocates to preserve the agricultural character of Franklin County, and the

² The Applications also proposed 4.4 miles of transmission line located in Washington County, Maryland, and 3.1 miles in Harford County Maryland

County's other local natural, scenic, and historic resources, and works on behalf of its members' property rights, consumer rights, and environmental rights.

62. Further, Stop Transource Franklin County also has an interest in ensuring that the Siting Application, including if reconfigured by the Joint Amended Application represents the minimum adverse environmental impact on land use, soil and sedimentation, plant and wildlife habitats, terrain, hydrology, landscape, archeologic areas, historic areas, and scenic areas.

63. Based on a review of the Joint Amended Application and the existing Siting Application, STFC members object to the impact of siting, construction, operation and maintenance of the transmission lines and new substation.

64. If approved, the pending Application, including with Joint Amended Application for the reconfigured East portion will violate the members' individual environmental rights, as set forth in the Pennsylvania Constitution, including the "right to clean air, pure water, and to the preservation of the natural, scenic, historic and aesthetic values of the environment." Pa. Const. art. 1, § 27.

65. The environmental rights of Pennsylvanians are on par with all of the "most sacred political and individual rights" contained in Article 1 of the Pennsylvania constitution, Pennsylvania Env'tl Def. Found. v. Com., 161 A.3d 911, 916 (Pa. 2017) (hereinafter "PEDF").

66. Transource's transmission line project, even with the reconfiguration in York County continues to threaten STFC members' individual rights to the existing rural, agricultural aesthetic of Franklin County and has not changed the proposed 135-foot high towers every 800 feet for more than 24 miles³, structures that are not compatible with existing agricultural

³ The proposed route in Franklin County is still 28.8 miles, approximately 4.6 miles of which are in Maryland. Siting Application at 28.

landscapes.

67. In addition to ensuring an individual's environmental rights, Article 1, Section 27 establishes the PUC's duty as trustee of the natural resources of this Commonwealth for the benefit of the people of the Commonwealth, including future generations. Pa. Const. art. 1, § 27.

68. The second and third sentences of Article 1, Section 27, the "public trust clauses," establish that "Pennsylvania's public natural resources are the common property of all people, including generations to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all people." Pa. Const. art. 1, § 27; PEDF, 161 A.3d at 931.

69. "The natural resources are the corpus of the trust, the Commonwealth is the trustee, and the people are named the beneficiaries." PEDF, 161 A.3d at 931-32 (citing Robinson Twp., Delaware Riverkeeper Network, et al. v. Com., 83 A.3d 901, 956-57 (Pa. 2013) (hereinafter, "Robinson II").

70. The PUC, like "all agencies and entities of the Commonwealth government, both statewide and local, [has] a fiduciary duty to act toward the corpus with prudence, loyalty, and impartiality." PEDF, 161 A.3d at 932 n.23 (citing Robinson II, at 956-57).

71. Transource has not adequately evaluated the effect that the siting and construction of the transmission lines on prime farmland soil in the right-of-way will have on the natural resources that the PUC holds in trust, including Franklin County's farmland. West Siting Application at 51.

72. The PUC, as the government agency authorized under 66 Pa.C.S. § 1501 to review siting applications for electric transmissions lines, as a trustee, "has greater degree of skill than that of a man of ordinary prudence" and therefore, "is liable for a loss resulting from the failure

to use such skill as he has.” PEDE, 161 A.3d at 932 (quoting In re: Mendenhall, 398 A.2d 951, 953 (Pa. 1979) (quoting Restatement (Second) of Trusts § 174)).

73. In addition to violating the foregoing constitutional interests, the Joint Amended Application, and the Siting Application as amended, fails to meet the statutory requirements of Section 1501 of the Public Utility Code, and the regulatory requirements at 52 Pa. Code Section § 57.71 et seq.

74. The PUC cannot grant the approval unless it finds

- (1) That there is a need for it;
- (2) That it will not create an unreasonable risk of danger to the health and safety of the public;
- (3) That it is in compliance with applicable statutes and regulations providing for the protection of the natural resources of this Commonwealth; and
- (4) That it will have the minimum adverse environmental impact, considering the electric power needs of the public, and the state of the available technology and available alternatives.


52 Pa. Code § 57.76.

75. The Siting Application, including with the Joint Amended Application, does not adequately address the current and future need; whether the original or reconfigured project remedies alleged “transmission congestion constraints” in Maryland, Virginia, West Virginia and Pennsylvania in the absence of other projects; whether reliability violations are expect and would be remedied only by approval of this project; and whether the reconfigured route as proposed in the Joint Amended Application is the most cost-effective alternative to remedy alleged “transmission congestion constraints.”

WHEREFORE, STFC requests that this Commission deny the Joint Amended Application, the consolidation Applications, consolidated under Docket No. A -2017-02640395

including the pending Application related to the West (Franklin County portion) in Docket No. A-2017-2640200, the Zoning Petitions, Docket No. 2018-20183001883, and the many associated Condemnation Applications; determine that the Settlement Agreements are not in the public interest, and award any and all relief deemed appropriate.

Respectfully submitted,
CURTIN & HEEFNER LLP

By: 
Mark L. Freed (Pa. I.D. No. 63860)
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Dated: February 19, 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 Answer to the Joint Amended Application of Transource Pennsylvania, LLC and PPL Electric Utilities Corporation 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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By: _____
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Date: February 19, 2020