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March 12, 2020

VIA eFILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
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 230 kV Transmission Line Associated with the Independence Energy Connection-East Project in Portions of York County, Pennsylvania
Docket No. A-2017-2640195

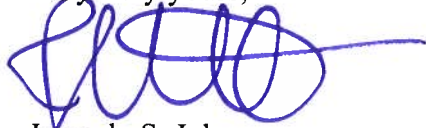
Application of Transource Pennsylvania, LLC Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project in Portions of Franklin County, Pennsylvania
Docket No. A-2017-2640200

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced dockets is the **Prehearing Memorandum of PECO Energy Company**.

If you have any questions regarding this filing, please do not hesitate to contact me at 215-841-4353.

Very truly yours,



Jennedy S. Johnson

Enclosures

cc: Honorable Elizabeth A. Barnes

#: 4599203

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Amended 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
	:	:	
Amended 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
	:	:	
Amended 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
	:	:	
Amended 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, <i>et al</i>
	:	:	

**PREHEARING MEMORANDUM OF
PECO ENERGY COMPANY**

This memorandum is submitted in response to the Prehearing Conference Order issued by Administrative Law Judges Elizabeth H. Barnes and Andrew M. Calvelli (“ALJs”) dated January 31, 2020.

I. INTRODUCTION

On February 7, 2017, Transource Pennsylvania, LLC (“Transource”) filed with the Pennsylvania Public Utility Commission (“Commission”) an Application for All of the Necessary Authority, Approval, and Certificates of Public Convenience (1) to Begin to Furnish and Supply

Electric Transmission Service in Franklin and York Counties, Pennsylvania; (2) for Certain Affiliated Interest Agreements; and (3) for any Other Approvals Necessary (“Application”). On January 29, 2020, Transource (and PPL Electric Utilities) submitted Amended Applications to the Commission.

II. INTERVENTION

On April 14, 2017, PECO filed its Petition to Intervene, which was not opposed by any party. The Petition to Intervene was subsequently approved by the ALJs.

III. ISSUES

A portion of the facilities Transource proposes to build would be connected to PECO infrastructure. Any modifications made to the project during this or any subsequent citing proceeding could result in obligations to PECO and ultimately its customers. Through its participation, PECO seeks to assess and monitor the impacts of Transource’s proposal on PECO customers and facilities.

IV. DISCOVERY

PECO proposes the adoption of the Commission’s existing discovery regulations as set forth in 52 Pa. Code Section 5.321, *et seq.*

V. WITNESSES

At present, PECO does not intend to present a witness in this proceeding. PECO reserves the right to call a witness or witnesses and will notify ALJ Barnes and the parties of any witness(es) if such need is determined.

VI. PROPOSED PROCEDURAL SCHEDULE

PECO is committed to working with the Administrative Law Judge and the parties to arrive at a mutually agreeable procedural schedule.

VII. SETTLEMENT

PECO is willing to pursue all avenues of settlement with the parties including the possible stipulation of individual issues or more substantial settlement discussions that might lead to a comprehensive resolution of this matter.

VIII. SERVICE LIST

PECO requests that the official service list entry for the Company be as follows:

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IX. CONCLUSION

PECO respectively requests the entry of a scheduling and discovery order based upon the terms set forth above.



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Dated: March 12, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**Application of Transource Pennsylvania, :
LLC Filed Pursuant to 52 Pa. Code :
Chapter 57, Subchapter G, for Approval :
of the Siting and Construction of the : Docket No. A-2017-2640200
230 kV Transmission Line Associated :
With the Independence Energy :
Connection-West Project in Portions of :
Franklin County, Pennsylvania :**

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of a **Prehearing Memorandum of PECO Energy Company** on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

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