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March 12, 2020

**Via Electronic Filing**

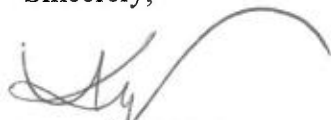
Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Applications 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, et al., Docket Nos. A-2017-2640195 and A-2017-2640200, *et al.*

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Citizens to Stop Transource, York County's ("York County Citizens") Prehearing Memorandum with regard to the above-referenced matter. The undersigned certifies that this filing contains no averments or denials of fact subject to verification and penalties under 52 Pa. Code Section 1.36. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Karen O. Moury

KOM/lww

cc: Hon. Elizabeth Barnes w/enc. (via email only)  
Cert. of Service

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of Citizens to Stop Transource York County's Prehearing Memorandum upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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Dated: March 12, 2020



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Karen O. Moury, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC	:	
for approval of the Siting and Construction of the	:	Docket No. A-2017-2640195
230 kV Transmission Line Associated with the	:	Docket No. A-2017-2640200
Independence Energy Connection - East and West	:	
Projects in portions of York and Franklin Counties,	:	
Pennsylvania.	:	
Petition of Transource Pennsylvania, LLC	:	
for a finding that a building to shelter control	:	Docket No. P-2018-3001878
equipment at the Rice Substation in Franklin	:	
County, Pennsylvania is reasonably necessary for	:	
the convenience or welfare of the public.	:	
Petition of Transource Pennsylvania, LLC	:	
for a finding that a building to shelter control	:	Docket No. P-2018-3001883
equipment at the Furnace Run Substation in York	:	
County, Pennsylvania is reasonably necessary for	:	
the convenience or welfare of the public.	:	
Application of Transource Pennsylvania, LLC	:	
for approval to acquire a certain portion of the lands	:	Docket No. A-2018-3001881, <i>et al.</i>
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.	:	

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**PREHEARING MEMO OF CITIZENS TO STOP TRANSOURCE-YORK COUNTY,  
MAPLE LAWN FARMS, INC., BARRON SHAW AND SHAW ORCHARDS**

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TO THE HONORABLE ELIZABETH BARNES:

Citizens to Stop Transource-York County, Maple Lawn Farms, Inc., Barron Shaw and Shaw Orchards (collectively, “York County Citizens”) file this Prehearing Memorandum in the above-captioned proceedings, pursuant to the Fourteenth Prehearing Order dated January 31, 2020.

## **I. BACKGROUND**

Transource Pennsylvania, LLC (“Transource PA”) filed Applications on December 27, 2017 seeking approval for the siting and construction of 230 kV transmission lines associated with the Independence Energy Connection-East Project (“IEC East Project”) in York County, Pennsylvania (“York County Siting Application”) and the Independence Energy Connection-West Project in Franklin County with the Pennsylvania Public Utility Commission (“Commission”). As the procedural history is lengthy, the York County Citizens will focus on more recent developments that are relevant to its position in this proceeding.

On October 17, 2019, Transource PA filed a Joint Partial Settlement (“Joint Partial Settlement”) with the Commission that it had reached with the York County Citizens on September 5, 2019. By that Settlement, Transource agreed to amend the York County Siting Application and to propose and seek approval of an alternative configuration for the IEC East Project. Attached to the Joint Partial Settlement as Exhibit A is the proposed reconfiguration of the IEC East Project, which largely uses existing infrastructure of PPL Electric Utilities Corporation (“PPL Electric”).

On January 29, 2020, Transource PA and PPL Electric filed a Joint Amended Application. A prehearing conference has been scheduled for March 18, 2020.

## **II. ISSUES**

The York County Citizens have reviewed the Joint Amended Application and determined that it is consistent with the Settlement, which their counsel previously executed and they continue to support. Therefore, the York County Citizens have identified no issues to raise during this proceeding but will monitor so as to identify and respond to any developments that could adversely affect approval of the Joint Partial Settlement.

If the Commission denies the Joint Amended Application, the York County Citizens understand that Transource PA may elect to proceed with the original IEC East Project configuration. Joint Partial Settlement ¶ 12. In that event, the York County Citizens have reserved their procedural rights to hearing and briefing so that they may argue their litigation position in opposition to the original York County Siting Application. Joint Partial Settlement ¶ 15.


**III. PROPOSED WITNESSES**

The York County Citizens do not intend to present any additional testimony. However, the York County Citizens plan to file a statement in support of the Joint Partial Settlement in accordance with the procedural schedule developed for this proceeding.

**IV. PROCEDURAL SCHEDULE**

The York County Citizens defer to the active parties in this proceeding to develop a procedural schedule and will abide by the result of their efforts.

Respectfully submitted,



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Date: March 12, 2020