

112 Market Street, 8<sup>th</sup> Floor Harrisburg, PA 17101 Phone: 717.234.6700

June 5, 2020

# Via Email Only

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

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 230kV 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.

WWW.SALZMANNHUGHES.COM

# Dear Counsel:

Enclosed please find the Interrogatories and Requests for Production of Documents of the County of Franklin- Set I, in the above referenced matters.

Please provide verified answers to these Interrogatories and Requests for Production of Documents within ten (10) days of service in accordance with the Procedural Order. Please communicate any objections you may have to these Interrogatories and Requests for Production of Documents as soon as possible.

If you have any questions or concerns, please feel free to contact me at the address listed above. The enclosed Certificate of Service showing service of these Interrogatories and Requests for Production of Documents has been filed with the Secretary.

Very truly yours,

SALZMANN HUGHES, P.C.

/s/ Scott T. Wyland Scott T. Wyland

STW/nas Enclosures

cc: PA PUC Secretary Rosemary Chiavetta (Letter and Certificate of Service only)
Certificate of Service

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Interrogatories and Requests for Production of Documents of the County of Franklin directed to Transource Pennsylvania LLC- Set I upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

#### VIA FIRST CLASS MAIL ADDRESSED AS FOLLOWS:

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

Allen Rice Lori Rice 1430 Henry Lane Chambersburg, PA 17202

Lois White 1406 Walker Road Chambersburg, PA 17202

Hugh McPerson 2885 New Park Road New Park, PA 17352

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

Fred Byers 1863 Coldsmith Rd Shippensburg, PA 17257

Karen Benedict Rodney Myer 5413 Manheim Rd Waynesboro, PA 17268 Leonard Kauffman Mary Kauffman 4297 Olde Scotland Rd Chambersburg, PA 17202

Willa Weller Kaal 67 Summer Breeze Lane Chambersburg, PA 17202

Danielle Bernecker 1827 Wood Duck Dr E Chambersburg, PA 17202

Jan Horst Georgiana Horst 826 New Franklin Rd Chambersburg, PA 17202

Roy Cordell Emma Cordell 4690 Fetterhoff Chapel Road Chambersburg, PA 17202

Ashley Hospelhorn 8010 Hidden Valley Ln Waynesboro, PA 17268

Ashley Hospelhorn 116 West 3<sup>rd</sup> Street Waynesboro, PA 17268 Lantz Sourbier Laura Sourbier 64 Edgewood Cir Chambersburg, PA 17202

Michael Cordell 4219 Altenwald Rd Waynesboro, PA 17268

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

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

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

Darwyn Benedict 410 N Grant Street Waynesboro, PA 17268 Courtney Dettinger Derek Dettinger 24 Chanceford Rd Brogue, PA 17309

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

Clint Barkdoll Owls Club, Inc. 87 W Main St Waynesboro, PA 17268

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

Kathryn Urbanowicz Clean Air Council 135 South 19th St Suite 300 Philadelphia, PA 19103

### VIA EMAIL AND FIRST CLASS MAIL AS FOLLOWS:

Karen O. Moury, Esquire
Eckert Seamans
213 Market St, 8<sup>th</sup> Floor
Harrisburg, PA 17101
Maple Lawn Farms, Inc.,
Rose Tree-Blue Mountain Hunt Club, Inc.
& Citizens to Stop Transource
kmoury@eckertseamans.com

Thomas J. Sniscak, Esquire Whitney E. Snyder, Esquire Hawke McKeon and Sniscak LLP 100 N Tenth Street Harrisburg, PA 17101 York County Planning Commission TJSniscak@hmslegal.com wesnyder@hmslegal.com Linus E. Fenicle, Esquire Reager & Adler PC 2331 Market St Camp Hill PA 17011 Quincy Township Ifenicle@reageradlerpc.com

John L. Munsch, Esquire 800 Cabin Hill Drive Greensburg, PA 15601 Mait & West Penn Power jmunsch@firstenergycorp.com

Amanda Riggs Conner, Esquire Hector Garcia, Esquire American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Columbus, OH 43215 arconner@aep.com hgarcia1@aep.com

Anthony D. Kanagy, Esquire Lindsay A. Berkstresser, Esquire David MacGregor, Esquire Post & Schell, P.C. 17 North Second Street, 12th Floor Harrisburg, PA 17101 Transource Pennsylvania LLC akanagy@postschell.com LBerkstresser@postschell.com dmacgregor@postschell.com

Sharon E. Webb, Esquire Office of Small Business Advocate 555 Walnut St, 1<sup>st</sup> Floor Harrisburg, PA 17101 swebb@pa.gov

Kimberly A. Klock, Esquire PPL Electric Utilities Two North Ninth St Allentown, PA 18101 PPL Electric Utilities kklock@pplweb.com Joanna A. Waldron, Esquire
Mark L. Freed, Esquire
Curtin & Heefner LLP
Doylestown Commerce Center
2005 S Easton Road Suite 100
Doylestown, PA 18901
STOP Transource Franklin County
jaw@curtinheefner.com
mlf@curtinheefner.com

Dianne E. Dusman, Esquire
Phillip D. Demanchick, Esquire
David T. Evrard, Esquire
Darryl A. Lawrence, Esquire
Office of Consumer Advocate
555 Walnut Street 5th Floor
Forum Place
Harrisburg, PA 17101
DDusman@paoca.org
PDemanchick@paoca.org
Dlawrence@paoca.org
Devrard@paoca.org
Transource@paoca.org

Jack Garfinkle, Esquire
Jennedy S. Johnson, Esquire
Romulo L. Diaz Jr., Esquire
PECO Energy Company
2301 Market Street
Legal Dept S23-1
Philadelphia, PA 19103
PECO Energy Company
Jack.garfinkle@exeloncorp.com
jennedy.johnson@exeloncorp.com
Romulo.diaz@exeloncorp.com

Teresa Harrold, Esquire FirstEnergy 2800 Pottsville Pike PO BOX 16001 Reading, PA 19612-6001 MAIT tharrold@firstenergycorp.com

Barron Shaw Jana Shaw 445 Salt Lake Rd Fawn Grove PA, 17321 Barron@shaworchards.com

Salzmann Hughes, P.C.

Dated: June 5, 2020

/s/ Scott T. Wyland Scott T. Wyland