



Eckert Seamans Cherin & Mellott, LLC
213 Market Street
8th Floor
Harrisburg, PA 17101

TEL: 717 237 6000
FAX: 717 237 6019

Karen O. Moury
717.237.6036
kmoury@eckertseamans.com

August 11, 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") Statement in Support of the Joint Partial Settlement executed by Transource Pennsylvania, LLC and the York County Citizens and filed on October 18, 2019. This Statement in Support is being filed in lieu of a Main Brief. Copies to be served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. Please contact me if you have any questions.

Sincerely,

/s/ Karen O. Moury

Karen O. Moury

KOM/lww
Enclosure

cc: Administrative Law Judge Barnes (email only)
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

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

Via Email Only

Anthony D. Kanagy, Esq.
David B. MacGregor, Esq.
Lindsay A. Berkstresser, Esq.
Post & Schell
17th N. Second St., 12th Fl.
Harrisburg, PA 17101-1601
akanagy@postschell.com
dmacgregor@postschell.com
lberkstersser@postschell.com

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

Sharon E. Webb, Esq.
Office of Small Business Advocate
300 North Second St., Suite 202
Harrisburg, PA 17101
swebb@pa.gov

Joanna A Waldron Esq.
Mark L. Freed, Esq.
Curtin & Heefner LLP
Doylestown Commerce Center
2005 S Easton Road Suite 100
Doylestown PA 18901
jaw@curtinheefner.com
mlf@curtinheefner.com

Kimberly A. Klock, Esq.
Michael J. Shafer, Esq.
PPL Electric Utilities
Two North Ninth Street
Allentown, PA 18101
kklock@pplweb.com
mshafer@pplweb.com

Linus Fenicle, Esq.
Reager & Adler, PC
2331 Market Street
Camp Hill, PA 17011
lfenicle@reageradlerpc.com

Teresa Harrold, Esq.
FirstEnergy
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
tharrold@firstenergycorp.com

Thomas J. Sniscak, Esq.
Whitney E. Snyder, Esq.
Hawke McKeon and Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
tjsniscak@hmslegal.com
wesnyder@hmslegal.com

John L. Munsch, Esq
West Penn Power Company
800 Cabin Hill Drive
Greensburg, PA 15601-1689
jmunsch@firstenergycorp.com

Jack Garfinkle, Esq.
Jennedy S. Johnson, Esq.
PECO Energy Company
2301 Market Street
Legal Dept. S23-1
Philadelphia, PA 19103
Jack.garfinkle@exeloncorp.com
Jennedy.johnson@exeloncorp.com

Dianne E. Dusman, Esq.
Phillip D. Demanchick, Esq.
David T. Evrard, Esquire
Darryl A. Lawrence, Esq.
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Forum Place
Harrisburg, PA 17101
ddusman@paoca.org
pdemanchick@paoca.org
devrard@paoca.org
dlawrence@paoca.org
transource@paoca.org

Dated: August 11, 2020

Scott T. Wyland, Esq.
Bryan Salzmman, Esq.
Isaac P. Wakefield, Esq.
Salzman Hughes, P.C.
112 Market Street, 8th Floor
Harrisburg, PA 17101
swyland@salzmannhughes.com
gbsalzmman@salzmannhughes.com
iwakefield@salzmannhughes.com

/s/ Karen O. Moury

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, *et al.*
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. :

**STATEMENT OF YORK COUNTY CITIZENS IN SUPPORT OF
JOINT PARTIAL SETTLEMENT**

TO THE HONORABLE ELIZABETH BARNES:

Pursuant to the regulations of the Pennsylvania Public Utility Commission (“Commission”) at 52 Pa. Code §§ 5.231-5.232, Citizens to Stop Transource-York County, Maple Lawn Farms, Inc., Barron Shaw and Shaw Orchards (collectively, “York County Citizens”) file

this Statement in Support of the Joint Partial Settlement between Transource Pennsylvania LLC (“Transource PA”) and the York County Citizens, which was filed with the Commission on October 18, 2019.

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”).

Under the Joint Partial Settlement, Transource agreed to amend the York County Siting Application to seek approval of an alternative route for the IEC East Project. Attached to the Joint Partial Settlement is the proposed reconfiguration of the IEC East Project, which largely uses existing transmission infrastructure of PPL Electric Utilities Corporation (“PPL Electric”). On January 29, 2020, Transource PA and PPL Electric filed a Joint Amended Application.

The York County Citizens support the Joint Partial Settlement because the proposed use of existing transmission infrastructure will result in the lines not being built on their properties. See Citizens Statement No. 1-Revised at 15. Also, it provides for withdrawal of the eminent domain applications which have been hanging like clouds over their heads for several years.

Respectfully submitted,

/s/ Karen O. Moury

Date: August 11, 2020

Karen O. Moury
PA Attorney ID #36879
Eckert, Seamans, Cherin & Mellott LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
717.237.6036.
kmoury@eckertseamans.com