

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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December 29, 2020

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Re: Letter of Notification of PECO Energy Company, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, For Approval to Site and Construct 0.5 Miles of Transmission Lines in Lower Chanceford Township, York County, Pennsylvania to Interconnect to the Transmission Grid the New 500-230 kV Furnace Run Substation Proposed by Transource Pennsylvania, LLC  
Docket No. A-2020-3023303

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Phillip D. Demanchick  
Phillip D. Demanchick  
Assistant Consumer Advocate  
PA Attorney I.D. # 324761  
E-Mail: [PDemanchick@paoca.org](mailto:PDemanchick@paoca.org)

Enclosures:

cc: Office of Administrative Law Judge (**email only**)  
Office of Special Assistants (**email only**: [ra-OSA@pa.gov](mailto:ra-OSA@pa.gov))  
Bureau of Technical Utility Services (**email only**)  
Certificate of Service

\*301566

CERTIFICATE OF SERVICE

Re: Letter of Notification of PECO Energy Company, : Docket No. A-2020-3023303  
Filed Pursuant to 52 Pa. Code Chapter 57 :  
Subchapter G, For Approval to Site and Construct :  
0.5 Miles of Transmission Lines in Lower :  
Chanceford Township, York County, Pennsylvania :  
to Interconnect to the Transmission Grid the New :  
500-230 kV Furnace Run Substation Proposed by :  
Transource Pennsylvania, LLC :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, 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:

Dated this 29<sup>th</sup> day of December 2020.

**SERVICE BY E-MAIL ONLY**

Jennedy S. Johnson  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19103

Kenneth M. Kulak  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103

Richard A. Kanaskie, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

John R. Evans, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923

/s/ Phillip D. Demanchick  
Phillip D. Demanchick  
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Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: December 29, 2020  
\*301567

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Darryl A. Lawrence  
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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Letter of Notification of PECO Energy :  
Company, Filed Pursuant to 52 Pa. Code Chapter :  
57 Subchapter G, For Approval to Site and :  
Construct 0.5 Miles of Transmission Lines in :  
Lower Chanceford Township, York County, :                   Docket No. A-2020-3023303  
Pennsylvania to Interconnect to the Transmission :  
Grid the New 500-230 kV Furnace Run :  
Substation Proposed by Transource :  
Pennsylvania, LLC :

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NOTICE OF INTERVENTION OF THE  
OFFICE OF CONSUMER ADVOCATE

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Pursuant to 52 Pa. Code Section 5.71, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Darryl A. Lawrence  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 93682  
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Phillip D. Demanchick  
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Counsel for:  
Tanya J. McCloskey  
Acting Consumer Advocate

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Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
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Respectfully submitted,

Dated: December 29, 2020  
\*301363

/s/Phillip D. Demanchick  
Phillip D. Demanchick  
Assistant Consumer Advocate

PUBLIC STATEMENT OF THE  
OFFICE OF CONSUMER ADVOCATE  
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Acting Consumer Advocate determined to file an Intervention and participate in proceedings before the Commission involving the Letter of Notification of PECO Energy Company (PECO or the Company) at Docket No. A-2020-3023303.

On December 16, 2020, PECO filed a Letter of Notification with the Pennsylvania Public Utility Commission (Commission), seeking siting authority to site and construct a 0.5 mile segment of transmission line interconnecting the proposed Furnace Run Substation associated with the Independence Energy Connection Project (IEC Project) to the bulk electric grid (Project or Application). PECO's proposed segment of transmission line is part of the larger IEC Project, which itself is the subject of continued adversarial proceedings before the Commission at Docket No. A-2017-2640195, *et al.* As such, the need for PECO's Project is directly dependent upon whether this Commission approves the IEC Project.

The OCA has opposed construction of the IEC Project in Pennsylvania and continues to advocate that the Commission deny approval. Accordingly, the OCA has determined to intervene and participate in these proceedings to ensure that its interest regarding the IEC Project is protected, that the Commission does not approve this Project if the IEC Project is denied, and that PECO's filing meets all legal requirements of the Public Utility Code, applicable Commission rules and regulations, and Pennsylvania law. The OCA also seeks to ensure that the interest of Pennsylvania ratepayers are protected in this proceeding.