


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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January 21, 2021

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

Re: Application of PECO Energy Company Under 15 Pa. C.S. § 1511(c)
For A Finding And Determination That The Service To Be
Furnished By The Applicant Through Its Proposed Exercise Of The
Power Of Eminent Domain To Acquire A Certain Portion Of The
Land Of William S. Harbold and Sandra A. Harbold in Lower
Chanceford Township, York County, Pennsylvania For The Siting
And Construction Of Connecting Transmission Lines Associated
With the Independence Energy Connection-East Project Is
Necessary or Proper For The Service, Accommodation,
Convenience Or Safety Of The Public
Docket No. A-2020-3023332

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

Enclosures:

cc: The Honorable Mark A. Hoyer (**email only**)
The Honorable Emily I. DeVoe (**email only**)
Office of Special Assistants (**email only**: ra-OSA@pa.gov)
Bureau of Technical Utility Services (**email only**)
Certificate of Service

*302772

CERTIFICATE OF SERVICE

Re: Application of PECO Energy Company Under :
15 Pa. C.S. § 1511(c) For A Finding And :
Determination That The Service To Be :
Furnished By The Applicant Through Its :
Proposed Exercise Of The Power Of Eminent :
Domain To Acquire A Certain Portion Of The :
Land Of William S. Harbold and Sandra A. : Docket No. A-2020-3023332
Harbold in Lower Chanceford Township, York :
County, Pennsylvania For The Siting And :
Construction Of Connecting Transmission :
Lines Associated With the Independence :
Energy Connection-East Project Is Necessary :
or Proper For The Service, Accommodation, :
Convenience Or Safety Of The Public :

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 21st day of January 2021.

SERVICE BY E-MAIL ONLY

Jennedy S. Johnson, Esquire
PECO Energy Company
2301 Market Street, Suite 23-1
Philadelphia, PA 19103

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

SERVICE BY FIRST CLASS MAIL, POSTAGE PREPAID

(Please note we are only using e-service at this time due to the COVID-19 emergency. Hard copies can be provided later upon request when normal operations resume)

William and Sandra Harbold
221 Goram Road
Brogue, PA 17309

/s/ Phillip D. Demanchick

Phillip D. Demanchick
Assistant Consumer Advocate
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Counsel for:
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Dated: January 21, 2021
*302775

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of PECO Energy Company Under :
15 Pa. C.S. § 1511(c) For A Finding And :
Determination That The Service To Be :
Furnished By The Applicant Through Its :
Proposed Exercise Of The Power Of Eminent :
Domain To Acquire A Certain Portion Of The :
Land Of William S. Harbold and Sandra A. :
Harbold in Lower Chanceford Township, York :
County, Pennsylvania For The Siting And :
Construction Of Connecting Transmission Lines :
Associated With the Independence Energy :
Connection-East Project Is Necessary or Proper :
For The Service, Accommodation, Convenience :
Or Safety Of The Public :

Docket No. A-2020-3023332

NOTICE OF INTERVENTION OF THE
OFFICE OF CONSUMER ADVOCATE

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
E-Mail: DLawrence@paoca.org

Phillip D. Demanchick
Assistant Consumer Advocate
PA Attorney I.D. # 324761
E-Mail: PDemanchick@paoca.org

David T. Evrard
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Counsel for:
Tanya J. McCloskey
Acting Consumer Advocate

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Respectfully submitted,

Dated: January 21, 2021
*302758

/s/Phillip D. Demanchick
Phillip D. Demanchick
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PA Attorney I.D. # 324761
E-Mail: PDemanchick@paoca.org

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 Application of PECO Energy Company (PECO or the Company) at Docket No. A-2020-3023332.

On December 16, 2020, PECO filed a Letter of Notification and several Eminent Domain Applications 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.