BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania, LLC filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230 kV Transmission Line Associated with the **Independence Energy Connection-East Project** in Portions of York County, Pennsylvania	:	Docket No. A-2017-_____

Transource Pennsylvania, LLC
Independence Energy Connection-East Project

Statement No. 1

Written Direct Testimony of
Peggy I. Simmons

Topics Addressed:
Overview of the IEC Project;
Description of Transource PA;
Process to Prepare the Siting Application;
Decision Making Process within Transource PA
Construction, Operations and Maintenance of the IEC Project; and
Status on the Right-of-Way Acquisitions.

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is Peggy I. Simmons. My business address is American Electric Power, 1 Riverside Plaza, Floor 25, Columbus, OH 43215.

Q. What is your position at American Electric Power?

A. I am employed by American Electric Power Service Corporation ("AEPSC") as the Managing Director Transmission Asset Strategy. In this capacity I provide services to Transource Energy, LLC, the parent of Transource Pennsylvania, LLC ("Transource PA" or the "Company").

Q. Please briefly describe the Transmission Asset Strategy and Policy Department and your primary areas of responsibility as Managing Director, Transmission Asset Strategy.

A. The Transmission Asset Strategy and Policy ("TASP") department is part of the AEP Transmission business unit. Among its activities, TASP provides transmission strategy and policy positions, and oversees reporting needs for the AEP transmission assets for the AEP transmission-only companies and the AEP operating companies at the regional transmission organizations ("RTOs"), the Federal Energy Regulatory Commission ("FERC"), state regulatory commissions and various industry meetings. TASP also provides oversight of AEP's transmission joint ventures and interfaces with their corporate partners. TASP, in conjunction with other AEP business units, advocates AEP Transmission's strategic vision to policy makers at national, regional and industry forums

and at FERC and state commissions, to help educate, coordinate and build consensus on strategic transmission initiatives.

My current responsibilities include providing transmission business unit representation for our operating companies in their respective state jurisdictions for regulatory and policy needs as well as at FERC. I have responsibilities for the regulatory needs of the AEP transmission-only companies ("Transcos") that were created to assist the AEP operating companies. I have similar regulatory responsibilities for Transource Energy, a joint venture with Great Plains Energy created to pursue competitive transmission projects, as well. My responsibilities also include oversight for transmission siting, outreach and right-of-way.

Q. Please briefly describe your educational background and business experience.

A. I earned a Bachelor's degree in Economics from The Ohio State University in 1999 and a Master's degree in Science Administration with a concentration in Public Policy from Central Michigan University in 2008. I was employed by AEPSC in 1999 as part of the Commercial Operations Analyst program. In 2003 I joined the regulatory department where I participated in numerous regulatory filings in AEP's eleven state jurisdictions supporting cost recovery related to purchases of energy and fuel, off-system sales and RTO market-related charges. In 2006 I joined the Renewable Energy department and was promoted to Renewable Energy Manager in 2008. I joined AEP Energy Partners in 2011 as Manager of Renewable Energy having responsibility for two Texas windfarms as well as renewable energy credit procurement. In 2014, I joined AEP Ohio and led the wholesale auction efforts as Manager Regulatory Commodity Sourcing. In 2014, I

became Manager of Transmission Asset Strategy and Policy and was promoted to Director in 2015 and in August 2016 was promoted to Managing Director of Transmission Asset Strategy.

Q. What is the subject matter of your direct testimony?

A. My testimony addresses several subjects. First, I will provide a digest of the testimony and exhibits filed by Transource PA in support of the Siting Application. Second, I will provide a description of Transource PA and other related entities. Third, I will provide a brief overview of the Independence Energy Connection Project ("IEC Project"). Fourth, I will summarize the decision making process within Transource PA for selecting the routes for the transmission lines associated with the IEC Project. Fifth, I will explain how Transource PA will oversee the construction, operations, and maintenance of the IEC Project. Finally, I will provide an update on the status of Transource PA's right-of-way acquisitions.

II. DIGEST TO THE TESTIMONY AND EXHIBITS

Q. Please describe the Siting Application filed by Transource PA in this proceeding.

A. As explained below, the IEC Project involves: (i) construction of two new substations in Pennsylvania, the Rice Substation and the Furnace Run Substation; and (ii) construction of two new overhead double-circuit 230 kV interstate transmission lines, the Rice-Ringgold 230 kV Transmission Line (hereinafter, the Independence Energy Connection-West Project or "IEC-West Project") and the Furnace Run-Conastone 230 kV Transmission Line (hereinafter, the Independence Energy Connection-East Project or "IEC-East Project"). Through this Siting Application, Transource PA seeks approval

from the Pennsylvania Public Utility Commission (the "Commission" or "PUC") to site and construct the Pennsylvania portion of the double-circuit 230 kV transmission line associated with the IEC-East Project.

The IEC-East Project involves the construction of the new Furnace Run-Conastone 230 kV Transmission Line which extends approximately 15.8 miles, connecting the existing Baltimore Gas & Electric Conastone Substation located near Norrisville, Harford County, Maryland, and the new Furnace Run Substation to be located in York County, Pennsylvania. The Siting Application provides, among other things, an overview of the IEC Project, an explanation of the need for the IEC Project, a summary of the process of selecting the Proposed Route for the transmission line associated with the IEC-East Project, a description of the Proposed Route for the IEC-East Project, and a description of the design and safety of the transmission line.

Q. Please describe the Attachments filed with the Siting Application.

A. Accompanying the Siting Application are a series of Attachments, which includes an aerial map that collectively shows the transmission line route selected by Transource PA for the proposed IEC-East Project. The Attachments to the Siting Application include the following:

- Attachment 1 Commission Regulation Cross-Reference Matrix
- Attachment 2 Necessity Statement
- Attachment 3 Siting Study
- Attachment 4 Engineering Description
- Attachment 5 List of Owners of Property within the Right-of-Way
- Attachment 6 Agency Requirements

- Attachment 7 — List of Governmental Agencies, Municipalities, and Other Public Entities Receiving the Application
- Attachment 8 — List of Governmental Agencies, Municipalities, and Other Public Entities Contacted
- Attachment 9 — List of Public Locations where the Siting Application can be Viewed by the Public
- Attachment 10 — Electric and Magnetic Fields Policy and Practices of Transource Pennsylvania and Transource Maryland
- Attachment 11 — Vegetation Management
- Attachment 12 — Agency Coordination
- Attachment 13 — Public Notice Requirements

Q. Are you responsible for the oversight and preparation of any of the attachments or exhibits filed with the Siting Application?

A. Yes. I am responsible for overseeing the preparation of the entire Siting Application and supporting attachments.

Q. Please describe the testimony submitted with the Siting Application.

A. Transource PA is submitting a total of six statements, including this one, in support of the Siting Application for the IEC-East Project. These Statements provide additional explanation of the matters addressed in the Siting Application and identify the witness who is sponsoring each portion of the Siting Application.

> Transource PA St. No. 1: Peggy I. Simmons, Managing Director Transmission Asset Strategy for AEPSC – Provides an overview of the IEC Project; provides a description of Transource PA and other related entities; describes the process employed by Transource PA in developing, preparing and filing this Siting Application; explains the decision making process within Transource PA for selecting the transmission line route; explains how Transource PA

will oversee the construction, operations and maintenance of the IEC Project; and provides a status on the right-of-way acquisitions.

Transource PA St. No. 2: Kamran Ali, Director of Transmission Planning for AEPSC – Explains the need for the IEC Project; describes the IEC Project selected by PJM Interconnection, L.L.C. ("PJM"); and describes the obligation of Transource PA to Complete the Project.

Transource PA St. No. 3: Paul F. McGlynn, Manager in the PJM Transmission Planning Department – Explains the PJM Process; explains the need for the IEC Project; and describes how the IEC Project was selected by PJM

Transource PA St. No. 4: Barry A. Baker, Department Manager for Environmental Services, AECOM – Explains the environmental assessment, siting analysis, public outreach efforts, evaluation of the Alternative Routes, and selection of the Proposed Route for the new double-circuit 230 kV transmission line associated with the IEC-East Project.

Transource PA St. No. 5: Kent Herzog, Project Manager for Burns & McDonnell – Explains the design features of the IEC-East Project; describes the safety features that will be incorporated into the design of the new 230 kV transmission line.

Transource PA St. No. 6: Thomas Schaffer, Transmission Right of Way Manager for AEPSC – Explains the process used by Transource PA to attempt to acquire the rights-of-way and easements necessary for the IEC-East Project; and provides a summary of the status of negotiations with landowners.

III. DESCRIPTION OF TRANSOURCE PA

Q. Please describe Transource PA.

A. Transource PA is a limited liability company organized and existing under the laws of Delaware. Transource PA is a wholly-owned direct subsidiary of Transource Energy. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania. Specifically, upon receipt of all necessary approvals, Transource PA will construct, own, operate, and

maintain two new Pennsylvania substations and the Pennsylvania portions of two new 230 kV interstate transmission lines, the Rice-Ringgold 230 kV Transmission Line (IEC-West Project), and the Furnace Run-Conastone 230 kV Transmission Line (IEC-East Project, as part of the IEC Project. As further explained below, Transource PA's affiliate, Transource Maryland, LLC ("Transource MD"), will construct, own, operate, and maintain the Maryland portion of the IEC Project.

Q. Is Transource PA a Pennsylvania Public Utility?

A. On February 7, 2017, Transource PA filed an Application with the Commission requesting all necessary authority, approvals and certificates of public convenience authorizing Transource PA to begin to furnish and supply electric transmission service as a Pennsylvania public utility within two corridors to be located in Franklin and York Counties, Pennsylvania. *See Application of Transource Pennsylvania, LLC for All of the Necessary Authority, Approvals, and Certificates of Public Convenience (1) to Begin to Furnish and Supply Electric Transmission Service in Franklin and York Counties, Pennsylvania; (2) for Certain Affiliated Interest Agreements; and (3) for any Other Approvals Necessary to Complete the Contemplated Transactions*, Docket No. A-2017-2587821 ("Utility Application"). On July 10, 2017, the parties to the Utility Application proceeding filed a settlement agreeing that the Commission should grant Transource PA's Utility Application. By Initial Decision issued September 14, 2017, the Administrative Law Judge approved the Utility Application as modified by the settlement. As of the time this Siting Application was prepared, Transource PA's Utility Application was pending before the Commission for final approval.

Q. Please describe Transource PA's resources and experience in siting and constructing transmission facilities.

A. Transource PA and its affiliates have significant experience in successfully siting, constructing, owning, and operating transmission facilities. As explained above, Transource PA is the direct subsidiary of Transource Energy, which is indirectly owned by a partnership between American Electric Power Company, Inc. ("AEP") and Great Plains Energy Incorporated ("GPE").

AEP, through its subsidiaries, serves more than five million customers in eleven states, and owns and operates more than 40,000 circuit miles of electric transmission lines and approximately 224,000 miles of electric distribution lines. GPE, through its subsidiaries, serves over 800,000 customers in Missouri and Kansas, and owns and operates approximately 3,600 circuit miles of transmission lines. AEP and GPE operate their transmission assets with the highest standards of reliability, safety, and North American Electric Reliability Corporation ("NERC") compliance. Both AEP and GPE operate multiple, fully-functional control centers and employ more than 1,000 personnel in field operations to maintain, operate and restore transmission systems.

AEP and GPE currently employ approximately 300 people in transmission project management and construction management functions. Combined, AEP and GPE annually manage more than $2 billion in projects and have extensive experience in projects of a magnitude comparable to the IEC Project. Further, AEP and GPE have developed best-in-industry skills through over a 100+ year history of siting, designing,

constructing, and operating transmission grids consisting of approximately 44,000 miles of transmission lines.

In addition, as part of its current business practice, AEP has established partnerships with third-party engineering consultants who are trained in the appropriate application of AEP specifications and standards. Moreover, AEP has extensive experience in providing oversight to external consultants and third-party contractors, with industry-leading capabilities to effectively oversee all types of transmission siting, permitting, design and construction completed by outside firms.

Q. Will Transource PA be able to draw on the experience and resources of its affiliates for the siting, construction, ownership, operation, and maintenance of the IEC-East Project?

A. Yes. Transource PA will be able to draw on the significant resources and experience of AEP and GPE, including their rigorous and proven project management practices. Pending for PUC approval at Docket No. A-2017-2587821 are certain agreements that will enable Transource PA to rely on the experience, expertise, and best practices developed by Transource Energy and its affiliates in order to construct, own, operate, maintain, finance, and manage the Pennsylvania portion of the IEC-East Project.

IV. SUMMARY OF THE PROJECT

Q. Can you please provide an overview of the IEC Project?

A. Yes. As explained in the written direct testimony of Company witness Mr. Kamran Ali (Transource PA Statement No. 2) and Mr. Paul F. McGlynn (Transource PA Statement No. 3), PJM identified a need to alleviate transmission congestion constraints in

Pennsylvania, Maryland, West Virginia, and Virginia. To address these congestion constraints, PJM approved "Project 9A" as Baseline Upgrade Numbers b2743 and b2752. The IEC Project is a major component of the PJM-approved Project 9A.[1]

The IEC Project approved by PJM involves: (i) construction of two new substations in Pennsylvania, the Rice Substation and the Furnace Run Substation; and (ii) construction of two new overhead double-circuit 230 kV interstate transmission lines, the Rice-Ringgold 230 kV Transmission Line and the Furnace Run-Conastone 230 kV Transmission Line.

Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will extend approximately 29 miles, connecting the existing Ringgold Substation located near Smithsburg, Washington County, Maryland, and the new Rice Substation to be located in Franklin County, Pennsylvania. This transmission line project is referred to as IEC-West Project and is the subject of a separately filed Siting Application.

Upon receipt of all necessary approvals, the new Furnace Run-Conastone 230 kV Transmission Line will extend approximately 15.8 miles, connecting the existing Conastone Substation located near Norrisville, Harford County, Maryland, and the new Furnace Run Substation to be located in York County, Pennsylvania. This transmission line project is referred to as IEC-East Project and is the subject of this Siting Application.

As further explained by Mr. Kamran Ali (Transource PA Statement No. 2), Transource PA is obligated and responsible for the construction, ownership, maintenance,

[1] Project 9A also involves upgrades at existing transmission facilities in Pennsylvania and Maryland, which are the responsibility of other incumbent entities. The upgrades to existing facilities, while not part of the IEC Project, are inter-dependent components of the solution approved by PJM, and are described in more detail in Mr. Ali's testimony (Transource PA Statement No. 2).

and operation of the two new substations in Pennsylvania; and the Pennsylvania portion of the two new interstate transmission lines between Maryland and Pennsylvania. Transource MD is obligated and responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the two new interstate transmission lines between Maryland and Pennsylvania.

The total estimated cost of the IEC Project is approximately $230 million. The estimated cost for the IEC-East Project is approximately $98 million, which includes approximately $52 million for substation work and approximately $46 million for the new Furnace Run-Conastone 230 kV Transmission Line.

The scheduled in-service date is June 1, 2020. Construction is scheduled to begin as soon as practical following PUC approval. The engineering and design of the IEC-East Project are further explained in Attachment 4 to the Siting Application and in Mr. Kent Herzog's written direct testimony (Transource PA Statement No. 5).

Q. Please describe the major tasks Transource PA must undertake to construct this Project.

A. There are many tasks that must be organized and completed before construction can begin. Chief among these are resource acquisition, contract management, cost and schedule management, transmission line siting, public outreach, design, right-of-way acquisition, material procurement, permitting, regulatory approvals, construction and commissioning.

The IEC-East Project Siting Study (Attachment 3 to the Siting Application) was performed in accordance with the process described below and is fully discussed in the

direct testimony of Mr. Barry A. Baker, an employee of AECOM (Transource PA Statement No. 4). AECOM was hired due to their extensive expertise in siting large linear projects in Pennsylvania and elsewhere. AECOM provides comprehensive, life cycle services for transmission and distribution projects, from alternative route analyses, licensing and permitting, conceptual engineering, right-of-way services, and public involvement to detailed engineering and design, geotechnical engineering and subsurface investigation, site preparation, construction management, and regulatory compliance. The siting process involves selecting a proposed route that (1) reasonably minimizes adverse impacts on area land uses and the natural and cultural environment; (2) minimizes special engineering design requirements and unreasonable costs; and (3) can be constructed and operated in a safe, timely, and reliable manner.

As further described in Attachment 3 to the Siting Application, consistent with our customary practices, Transource PA conducted public outreach for the IEC-East Project, which included a series of open houses, a project website, a virtual open house, direct mailings, newspaper notifications, and automated phone calls.

The IEC-East Project design is undertaken in increasing levels of complexity, starting with a magnitude design and ending with a detailed design that incorporates soil conditions and other field elements such as topography and access roads. Design for the IEC-East Project, at AEP's direction, is being led by Burns & McDonnell, a recognized industry leader in the design of electric transmission infrastructure, with support from AEP's internal engineering staff. Burns & McDonnell is an employee-owned engineering, architecture and construction firm that designs, builds and secures electric transmission and distributions systems throughout North America.

There are a total of 49 different owners (38 in Pennsylvania) of 66 parcels of land (53 in Pennsylvania) along the route selected for the IEC-East Project. The process to secure the rights-of-way necessary for the IEC-East Project is further described in the written direct testimony of Mr. Thomas Shaffer (Transource PA Statement No. 6).

Q. Please summarize the principal permits and approvals required for this project.

A. Attachment 6 to the Siting Application lists the local, state and federal agency requirements for permits, approvals or documentation. At the state level, cultural resource investigation approvals, waters/wetland encroachment permits, Submerged Lands License Agreements, state threatened and endangered species consultation and approvals will be required for this project. Also, at the state level, Transource PA must receive PUC approval for the siting and construction of the transmission line. Commensurate with the approvals sought from the PUC, Transource MD is seeking to obtain approval from the Maryland Public Service Commission for the Maryland portions of the Project. At the federal level, approvals may be required from the U.S. Army Corps of Engineers and the U.S. Fish and Wildlife Service. These requirements are discussed more fully in Attachments 3 and 6 to the Siting Application.

Q. Please summarize the project schedule.

A. Pursuant to Schedule 6 of PJM's Amended and Restated Operating Agreement, and as stated in the Designated Entity Agreement, Transource MD and Transource PA are required to complete the IEC Project by June 1, 2020. Accordingly and in anticipation of receiving the PUC's approval by June 1, 2019, Transource PA currently is planning for a

12-month construction schedule commencing with right-of-way clearing and line construction by June 1, 2019.

V. DECISION MAKING PROCESS

Q. Please summarize Transource PA's process for selecting the route for the IEC-East Project.

A. As further described in Mr. Barry Baker's direct testimony (Transource PA Statement 4) and the Siting Study (Attachment 3 to the Siting Application), the Siting Team conducted a detailed siting analysis to determine a location for the IEC-East Project that best balances human/built, environmental, and engineering considerations. The purpose of the Siting Study is to gain an understanding of the opportunities and constraints in the Study Area to facilitate the development of feasible Alternative Routes, evaluate potential impacts associated with these Alternative Routes, and identify a Proposed Route to be constructed to meet the need for the IEC Project.

Ultimately, through a quantitative and qualitative analysis and comparison of the feasible Alternate Routes, the Siting Team identified "Alternative Route E" as the Proposed Route for the IEC-East Project. The Proposed Route was determined to be the route that best minimizes the overall impact of the IEC-East Project to the natural and human/built environments.

Q. What was your role on the siting team for purposes of the IEC-East Project?

A. My role is to provide general oversight of the siting team and provide directional guidance on siting related to the IEC-East Project.

VI. CONSTRUCTION, OPERATION AND MAINTENANCE

Q, Please explain how Transource PA will oversee the construction of the IEC-East Project, if approved by the PUC.

A. Transource PA has assigned a Project Director that will oversee all aspects of the IEC-East Project for Transource PA. The Project Director is responsible for overseeing the planning and execution of the project work from the preliminary designs through to energization. The Project Director also serves as the single point of contact with the client, owner, and utility. The Project Director will develop a detailed work plan and schedule based upon the specific project requirements, including the environmental and construction permitting as well as any specific right-of-way requirements.

The Project Director will be responsible for all aspects of project execution including: overall project management; engineering; permitting; right-of-way acquisition; material procurement; construction; checkout and commissioning; right-of-way restoration and project closeout; and handover to operations.

Transource PA will provide an experienced Construction Manager to oversee the construction effort and manage day-to-day activities in the field. The Construction Manager will be responsible for all construction and will report to the Project Director. The Construction Manager will be responsible for overseeing the on-site completion of work. The Construction Manager will coordinate the on-site construction activities. The Construction Manager's primary role will be to assure that day-to-day construction operations are executed safely and efficiently. The Construction Manager will assure that the project resources, including material and manpower are coordinated to meet the project objectives. The Construction Manager will oversee construction activities on both the substation and transmission line work utilizing qualified inspectors and

coordinators. These inspectors and coordinators will oversee vegetation clearing, site preparation and development, building of access roads, transmission tower and substation foundations, substation steel and equipment erection, transmission tower, hardware installation and line pulling, and commissioning activities on site.

Safety is the most important responsibility of the Construction Project Management Team. Transource PA firmly believes that no project objectives or milestones can ever come before the safety of the workforce and general public. The Project Director, Construction Manager and Inspection Team will ensure that performance of the construction activities adhere to the rigorous and proven project management and safety practices of Transource Energy and its affiliates, which represent a proven approach to safe work practices.

In addition to safety, the Construction Project Management Team is responsible for quality assurance and resource management to ensure the IEC-East Project is executed successfully on-time and on-budget. Transource PA will follow its established and proven-successful practices in performance of the work.

Q. Please explain how Transource PA will maintain the IEC-East Project, if approved by the PUC.

A. Transource PA will own, operate, and provide the maintenance for Rice and Furnace Run substations as well as the 230 kV transmission lines in Pennsylvania. Transource PA will use a combination of highly-qualified internal and external resources to accomplish these tasks in a safe, timely, and efficient manner.

Transource PA has access to a network of five Transmission Dispatch and System Control Centers that employ over 250 dedicated employees and is available 24 hours a day, 365 days a year. Transource PA will continuously monitor the health of the substation equipment remotely from one of these System Control Centers. In addition to our remote monitoring, Transource PA will perform thorough periodic physical maintenance checks with qualified personnel.

In Pennsylvania, Transource PA will establish a service agreement with a locally based qualified dedicated services contractor to provide systematic routine maintenance checks as well as immediate operation and maintenance services as needed.

In the event of a storm, outage, or emergency situation involving the new substations or transmission lines, Transource PA will be able to respond immediately to provide restoration support. Transource PA will provide a dedicated/assigned phone number which will be monitored 24 hours a day, 365 days a year for each of the incumbents to use in case of an event from a storm or responding to an outage. Transource PA will immediately call our dedicated services contractor to coordinate the issuance of resources to support the response effort. When responding to an event, the dedicated services contractor will call on its local crews, for a timely response.

Transource PA recognizes that a crucial element in meeting clients' service requirements is its ability to react promptly to a storm or other emergency situation and the capacity to restore service as quickly and economically as possible. The dedicated service provider will be structured to respond to any request for assistance 24 hours a day, 365 days a year.

VII. STATUS OF RIGHTS-OF-WAY

Q. Please describe the right-of-way requirements for this project.

A. Right-of-way requirements are discussed more fully in the direct testimony of Mr. Thomas Schaffer (Transource PA Statement No. 6). Transource PA's standard right-of-way width for a double circuit 230 kV transmission line is approximately 130 feet, 65 feet either side of the proposed centerline of the transmission line. A cross section of the proposed rights-of-way required for the IEC-East Project is provided in Attachment 4 to the Siting Application. The aerial maps of the route selected for the IEC-East Project are provided in Attachment 3, which show the location of the Proposed Route and identify the properties that are traversed by the proposed route. Additionally, a list of all persons owning property within the proposed rights-of-way is included in Attachment 5 to the Siting Application.

Q. Is Transource PA acquiring rights-of-way and easements for the IEC-East Project?

A. Yes. As explained in the direct testimony of Mr. Schaffer (Transource PA Statement No. 6), Transource PA is continuing to negotiate with all affected landowners to reach a reasonable and mutually acceptable right-of-way agreement. However, at the time it prepared this filing, Transource PA had not yet been able to acquire all of the rights-of-way and easements necessary for the IEC-East Project.

Q. Please explain why Transource PA has not been able to acquire all of the rights-of-way and easements necessary for the IEC-East Project.

A. PJM approved the IEC Project on August 2, 2016, with an in-service date of June 1, 2020. Following PJM's approval, Transource PA began the lengthy and detailed process

to identify and select a Proposed Route for the IEC-East Project. A Proposed Route was selected in late October 2017. Because the Proposed Route was only recently identified, Transource PA has not yet been able to complete negotiations and acquire the rights-of-way needed for the IEC-East Project. Additionally, at the time it prepared this filing, Transource PA's status as a Pennsylvania public utility was pending before the PUC. As a result, Transource PA did not have the access and survey rights granted to a Pennsylvania utility when it prepared this Siting Application. The lack of utility status has impacted Transource PA's ability to complete negotiations and acquire the rights-of-way needed for the IEC-East Project.

Q. Is Transource PA seeking to condemn rights-of-way and easements necessary for the IEC-East Project?

A. Not at this time. Transource PA will continue to negotiate with all affected landowners to reach a reasonable and mutually acceptable right-of-way agreement and, thereby, avoid the need to condemn rights-of-way across the properties traversed by the IEC-East Project. However, Transource PA has not yet been able to complete negotiations for the rights-of-way needed for the IEC-East Project given the timing of PJM approval of the project and the time necessary to undertake and complete the Siting Study and select the Proposed Route for the IEC-East Project as explained above. In the event that Transource PA is unable to acquire the rights-of-way needed for the IEC-East Project, Transource PA will promptly file separate applications seeking PUC approval to exercise the power of eminent domain to acquire rights-of-way and easements for the proposed IEC-East Project. If any such condemnation applications become necessary, Transource

PA will request that they be consolidated and considered with this Siting Application for the IEC-East Project.

Q. Does this conclude your direct testimony?

A. Yes, it does. If necessary, I will supplement my testimony if and as additional issues arise during the course of this proceeding.