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17 North Second Street
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717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of DC Farms, LLC in Quincy Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/skr
Enclosures

Rosemary Chiavetta, Secretary

May 15, 2018

Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

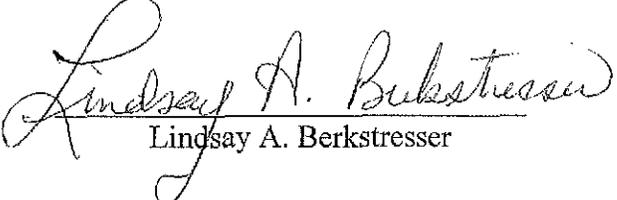
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

DC Farms, LLC
13689 Dream Highway
Newburg, PA 17240

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of DC Farms, LLC in Quincy Township, :
Franklin County, Pennsylvania for the Siting :
and Construction of the 230 kV Transmission :
Line Associated with the **Independence** :
Energy Connection-West Project is :
Necessary or Proper for the Service, :
Accommodation, Convenience or Safety of the :
Public :
:

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of DC Farms, LLC in Quincy Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA’s address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA’s attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

Transource PA’s attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC (“Transource Energy”).

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by DC Farms, LLC in Quincy Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the DC Farms, LLC property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on DC Farms, LLC. The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response, Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM's 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA's Maryland affiliate, Transource Maryland, LLC ("Transource MD"), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM's Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at 5730 Orphanage Road, Waynesboro, Franklin County, Pennsylvania 17268.

32. A deed for the property is recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Instrument Number 201416849 and a copy of said recorded deed is attached hereto as Attachment A.

33. The name and mailing address of the owner of record of said tract of land is DC Farms, LLC, 13689 Dream Highway, Newburg, PA 17240.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the DC Farms, LLC property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. §

1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with DC Farms, LLC and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that DC Farms, LLC and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon DC Farms, LLC, who is/are the record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

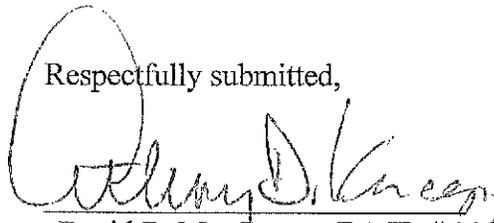
43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

Respectfully submitted,



Amanda Riggs Conner (District of Columbia ID # 481740)

Hector Garcia (VA ID # 48304)

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, OH 43215

Phone: 614-716-3410

Fax: 614-716-1613

E-mail: arconner@aep.com

E-mail: hgarcia1@aep.com

David B. MacGregor (PA ID # 28804)

Anthony D Kanagy (PA ID # 85522)

Lindsay A. Berkstresser (PA ID # 318370)

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Harrisburg, PA 17101-1601

Phone: 717-731-1970

Fax: 717-731-1985

E-mail: dmacgregor@postschell.com

E-mail: akanagy@postschell.com

E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

UPI: 19-0L12.-051.-000000

STREET ADDRESS: 5730 Orphanage Road, Waynesboro, PA 17268

THIS DEED

MADE the 24th day of SEPTEMBER
in the year two thousand fourteen (2014)

BETWEEN DANIEL S. LONG, single, of 6405 Nunnery Road, Waynesboro,
Pennsylvania-----GRANTOR

and DC FARMS, LLC, a Pennsylvania limited liability company, with an address of 13689
Dream Highway, Newburg, Pennsylvania-----GRANTEE

WITNESSETH, That in consideration of other good and valuable considerations and the
sum of One Million Two Hundred Three hundred Fifty Thousand (\$1,350,000.00)-----Dollars,
in hand paid, the receipt whereof is hereby acknowledged, the said grantor does hereby grant and
convey to the said grantee, in fee simple

ALL the following described real estate, lying and being situate in Quincy Township,
Franklin County, Pennsylvania, being a farm containing 100.412 acres, situated on the south side
of Orphanage Road (T-383), between Route # 316 and Route # 997, and improved with a two
and one-half (2-1/2) story, six (6) room brick dwelling house, and a brick frame barn, and being
more particularly bounded and limited as follows:

BEGINNING at an existing spike located in Orphanage Road (T-383) at the
corner of land now or formerly owned by Carl E. and Christine P. Blubaugh as is
shown on the survey hereafter referred to; thence through Orphanage Road (T-
383), North 81 degrees 47 minutes 51 seconds East, 580.74 feet to a set spike;
thence continuing through Orphanage Road (T-383), South 85 degrees 54 minutes
05 seconds East, 43.26 feet to a set spike; thence continuing through Orphanage
Road (T-383), through three (3) existing spikes on line, South 89 degrees 55
minutes 59 seconds East, 1,166.37 feet to a set spike at the corner of land owned
by the Trustees of the Quincy United Brethren Orphanage & Home; thence by
said land owned by the Trustees of the Quincy United Brethren Orphanage &
Home, through a set iron pin on line, South 00 degrees 55 minutes 58 seconds
East, 1,245.14 feet to an existing iron pin at land now or formerly owned by
Harlan R. and Lois Ellen Martin; thence by said land now or formerly owned by
Harlan R. and Lois Ellen Martin, South 54 degrees 34 minutes 02 seconds West,
1,943.87 feet to an existing stone at land now or formerly owned by C. Burnell
and Mary L. Rice; thence by said land now or formerly owned by C. Burnell and
Mary L. Rice, South 54 degrees 22 minutes 37 seconds West, 1,074.43 feet to an
existing corner post at land now or formerly owned by Paul H. and Lily E.
Stouffer; thence by said land now or formerly owned by Paul H. and Lily E.

Stouffer, North 36 degrees 15 minutes 18 seconds West, 279.12 feet to a set iron pin at land now or formerly owned by Daniel R. and Esther C. Petre; thence by said land now or formerly owned by Daniel R. and Esther C. Petre, North 63 degrees 32 minutes 11 seconds East, 602.25 feet to a set iron pin; thence by the same, North 13 degrees 05 minutes 49 seconds West, 1,764.77 feet to a set iron pin; thence by the same, North 86 degrees 00 minutes 10 seconds East, 671.00 feet to a set iron pin; thence by the same, and also by land now or formerly owned by Carl E. and Christine P. Blubaugh, through a set iron pin on line; North 00 degrees 47 minutes 15 seconds East, 660.30 feet to an existing spike located in Orphanage Road (T-383), the place of beginning. CONTAINING an area of 100.412 acres as is shown on a survey made by R. Lee Royer & Associates, Registered Professional Surveyor, dated April 28, 1992 and recorded in Franklin County Plat Book 288F, page 127.

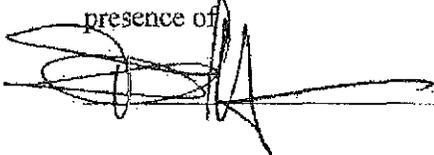
Being the same real estate conveyed to Daniel S. Long by deed of Milton W. Brown and Ruth H. Brown, husband and wife, dated September 29, 2005 and recorded in Franklin County Volume 2916, page 319.

SUBJECT, however, to all easements, restrictions and other matters legally affecting the same or noted on the aforesaid survey.

AND the said grantor will warrant specially the property hereby conveyed.

IN WITNESS WHEREOF, said grantor has executed this deed the day and year first above written.

Sealed and delivered in the presence of



(SEAL)

Daniel S. Long

COMMONWEALTH OF PENNSYLVANIA :
:SS
COUNTY OF FRANKLIN :

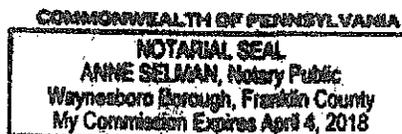
On this, the 24th day of SEPTEMBER, 2014, before me, a notary public, the undersigned officer, personally appeared Daniel S. Long, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

Anne Selman

Notary Public

My Commission expires _____



CERTIFICATE OF RESIDENCE

I hereby certify that the precise residence of the grantee herein is 13689 Dream Highway, Newburg, PA 17240.

Witness my hand this 27 day of September 2014.

[Signature]
On behalf of Grantee



COUNTY OF FRANKLIN
RECORDER OF DEEDS
Linda Miller, Recorder
Courthouse 157 Lincoln Way East
Chambersburg, PA 17201
Phone: (717) 261-3872

*RETURN DOCUMENT TO:
TIMOTHY W MISNER
39 S BROAD STREET
WAYNESBORO, PA 17268

Instrument Number - 201416849
Recorded On 9/24/2014 At 1:37:10 PM

* Instrument Type - DEED
Invoice Number - 105407 User ID - DSS
* Grantor - LONG, DANIEL S
* Grantee - DC FARMS LLC

* Total Pages - 4

* FEES.

STATE TRANSFER TAX	\$13,500.00
STATE WRIT TAX	\$0.50
STATE JCS/ACCESS TO JUSTICE	\$35.50
COUNTY RECORDING FEE	\$33.00
AFFORDABLE HOUSING	\$11.05
AFFORDABLE HOUSING	\$1.95
COUNTY IMPROVEMENT FEE	\$2.00
ROD IMPROVEMENT FEE	\$3.00
WAYNESBORO AREA	\$6,750.00
SCHOOL DIST REAL TAX QUINCY TOWNSHIP	\$6,750.00
TOTAL PAID	\$27,087.00

This is a certification page

DO NOT DETACH

This page is now part
of this legal document.

Franklin County UPI Verification
UPI Verified On September 24, 2014 By BMS

I hereby CERTIFY that this document is
recorded in the Recorder of Deeds Office
of Franklin County, Pennsylvania.

Linda Miller
Recorder of Deeds



* - Information denoted by an asterisk may change during
the verification process and may not be reflected on this page.

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

1101.00
DC FARMS LLC

19-01-12-051-000000
Approximate Easement Area = 1.41 Acres

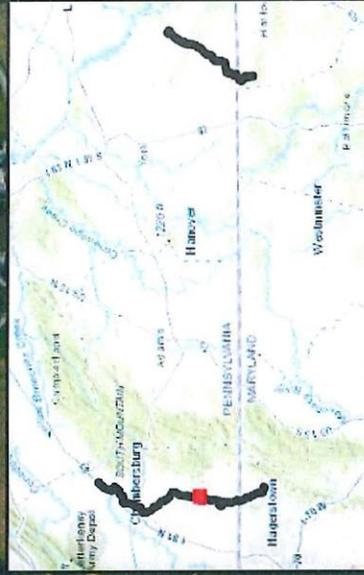


EXHIBIT A

Owner:
DC FARMS LLC
Franklin PA
Parcel ID: 1101.00
Rice to Ringgold



Source: ESRI and Burns & McDonnell Engineering.

-  Centerline
-  Parcels
-  Parcel Within ROW
-  ROW Approximately 130'

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED
2018 MAY 15 AM 11:16
PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 15 Pa.C.S. §1511(e) 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 Lands of J. Norman & Bonna Jane Diller in Washington Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/skr
Enclosures

Rosemary Chiavetta, Secretary
May 15, 2018
Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

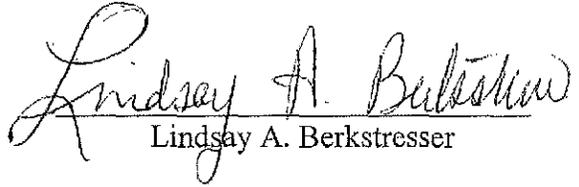
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

J. Norman & Bonna Jane Diller
20660 Millers Church Road
Hagerstown, MD 21742

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of J. Norman & Bonna Jane Diller in :
Washington Township, Franklin County, :
Pennsylvania for the Siting and Construction :
of the 230 kV Transmission Line Associated :
with the **Independence Energy Connection-** :
West Project is Necessary or Proper for the :
Service, Accommodation, Convenience or :
Safety of the Public :
:

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of J. Norman & Bonna Jane Diller in Washington Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA’s address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA’s attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

Transource PA’s attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC (“Transource Energy”).

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by J. Norman & Bonna Jane Diller in Washington Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the J. Norman & Bonna Jane Diller property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on J. Norman & Bonna Jane Diller. The

IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response,

Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA’s Maryland affiliate, Transource Maryland, LLC (“Transource MD”), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM’s Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at 13770 Hoovers Mill Road N., Waynesboro, Franklin County, Pennsylvania 17268.

32. A deed for the properties are recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania at Deed Book Vol. 1283, Page 466 and a copy of said recorded deed is attached hereto as Attachment A.

33. The name(s) and mailing address of the owners of record of said tract of land are/is: J. Norman & Bonna Jane Diller, 20660 Millers Church Road, Hagerstown, Maryland 21742.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the J. Norman & Bonna Jane Diller property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource

PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with J. Norman & Bonna Jane Diller and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that J. Norman & Bonna Jane Diller and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon J. Norman & Bonna Jane Diller, who is/are the record

owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

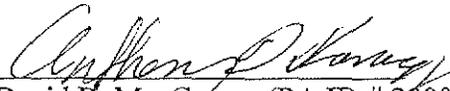
WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Respectfully submitted,

Amanda Riggs Conner (District of Columbia ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com


David B. MacGregor (PA ID # ~~28804~~)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
TREASURER
JAN 16 1996
900.00
THIS DEED 00518

4800.00
400.00

MADE the 16th day of January in the year nineteen hundred and ninety-six (1996)

BETWEEN NELSON RAY DILLER and HENRY ALLEN DILLER, Executors of the Last Will and Testament of Mary M. Diller a/k/a Mary Martin Diller, late of Antrim Township, Franklin County, Pennsylvania,

GRANTOR

AND J. NORMAN DILLER and BONNA JANE DILLER of Washington Township, Pennsylvania,

GRANTEES

Whereas Mary M. Diller a/k/a Mary Martin Diller, a resident of Antrim Township, Franklin County, Pennsylvania, died testate on March 8, 1995, seized of the hereinafter property, leaving a Last Will and Testament dated June 29, 1992, which was duly admitted to probate on March 29, 1995, and recorded among the Will Records of Franklin County, Pennsylvania, in Will Book Volume 143, Page 629, and

WHEREAS Letters Testamentary on the Estate of Mary M. Diller a/k/a Mary Martin Diller were duly granted to Nelson Ray Diller and Henry Allen Diller, on March 29, 1995;

NOW, THEREFORE, in consideration of the sum of FOUR HUNDRED EIGHTY THOUSAND (\$480,000.00) DOLLARS to them in hand paid, the receipt whereof is hereby acknowledged, Nelson Ray Diller and Henry Allen Diller, Executors as aforesaid, do hereby grant and convey in fee simple to J. Norman Diller and Bonna Jane Diller, Grantees herein,

ALL that certain tract or parcel of land lying and being situated in Washington Township, Franklin County, Pennsylvania, more particularly bounded and described as follows, to wit:-

BEGINNING at a stone and running thence by lands of J. Daniel Eshleman and Elaine J. Eshleman, his wife, and James M. Eshleman and Ada J. Eshleman, his wife, crossing Township Route 366, known as Hoover Mill Road and continuing by lands of Jonathan L. Barnett and Marian M. Barnett, his wife, North fifty-three (53) degrees West, seventy-nine and one-tenth (79.1) perches to a stone; thence by lands of John Gordon Neady and Michael Kriner Neady, South forty (40) degrees West, eighty-one (81) perches to a stone; thence by lands of J. Daniel Eshleman and Elaine J.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
TREASURER
JAN 16 1996
900.00

COPY

00906

00906

REALTY TRANSFER TAX

Washington School District
through
Washington Supervisors
amount of Tax Received 2400%
as on Deeds Resolution
Linda Melu Clerk

I hereby CERTIFY that this document is recorded in the Recorder's Office of Franklin County, Pennsylvania.



David W. Bowers

David W. Bowers
Recorder of Deeds

Eshleman, his wife, and by lands of James M. Eshleman and Ada J. Eshleman, his wife, South twenty-eight and one-half (28 1/2) degrees East, sixty-five (65) perches to a stone; thence by lands of James M. Eshleman and Ada J. Eshleman, his wife, South sixty-nine (69) degrees East, one and six-tenths (1.6) perches to a stone in Township Route 366; thence in Township Route 366 and by lands of James M. Eshleman and Ada J. Eshleman, his wife, and by lands of J. Daniel Eshleman and Elaine J. Eshleman, his wife, thence South nineteen and one-half (19 1/2) degrees West, twenty-seven and three-tenths (27.3) perches to a point in Township Route 366; thence by lands of J. Daniel Eshleman and Elaine J. Eshleman, his wife, South thirty (30) degrees East, sixteen and six-tenths (16.6) perches to a stone probably in a former public road; thence by lands of J. Daniel Eshleman and Elaine J. Eshleman, his wife, and by lands of Mary Alice Sands Stoops, North eighty-two and three-fourths (82 3/4) degrees East, two hundred twenty-eight and four-tenths (228.4) perches to a stone; thence by lands of Mary Alice Sands Stoops, North nine and three-fourths (9 3/4) degrees West, seventy-two and six-tenths (72.6) perches to a point; thence by lands of J. Daniel Eshleman and Elaine J. Eshleman, his wife, and James M. Eshleman and Ada J. Eshleman, his wife, South seventy-seven and one-half (77 1/2) degrees West, eighty-eight and eight-tenths (88.8) perches to a stone; thence by same, North sixty-one (61) degrees West, fifty (50) perches to a stone; thence by same, North seven and one-half (7 1/2) degrees East, six and nine-tenths (6.9) perches to the place of BEGINNING CONTAINING 141 Acres and 123 perches of land neat measure.

IT BRING THE SAME REAL ESTATE which Samuel B. Crall, Executor of the Last Will and Testament of G. E. Crall by deed dated March 8, 1929, and recorded in Franklin County Deed Book Vol. 233, page 406, conveyed to Clarence D. Ricker and Maud D. Ricker, his wife. Maud D. Ricker died October 25, 1937, thus vesting full and complete title to this real estate in her surviving spouse, Clarence D. Ricker, who together with Florence B. Ricker, his wife, by their Deed dated April 2, 1962, and recorded in Franklin County Deed Book Vol. 560, page 1117, conveyed the same to Enos M. Diller and Mary M. Diller, his wife. Enos M. Diller died March 22, 1987, thereby vesting full and complete title in this real estate in his surviving spouse, Mary M. Diller a/k/a Mary Martin Diller, who died seized thereof.

TOGETHER WITH the right to use a certain road leading in an easterly direction along the course running North eighty-two and three-fourths (82 3/4) degrees East, two hundred twenty-eight and four-tenths (228.4) perches and then running in a southeasterly direction across lands of Mary Alice Sands Stoops to Pennsylvania Route 316 as shown on a plan in Deed Book Vol. 288C, page 128.

And the said Nelson Ray Diller and Henry Allen Diller, Executors as aforesaid, for themselves, their heirs, executors, administrators and assigns, do hereby covenant, promise and agree to and with the said Grantees, their heirs, executors, administrators and assigns, by these presents, that they have not heretofore done, committed, or knowingly or willingly suffered to be done or committed any act, matter, or thing whatsoever, whereby the premises hereby granted, or any part thereof is, are, shall, or may be impeached, charged, or encumbered in title, charge, estate, or otherwise howsoever.

IN WITNESS WHEREOF, Nelson Ray Diller and Henry Allen Diller have executed this Deed themselves on behalf of their heirs, executors, administrators and assigns, the day, month and year first above written.

WITNESS:

W. L. Harrison

Nelson R. Diller

(SEAL)

Nelson Ray Diller, Executor
under the Last Will and Testament
of Mary M. Diller a/k/a/ Mary
Martin Diller

W. L. Harrison

Henry Allen Diller

(SEAL)

Henry Allen Diller, Executor
under the Last Will and Testament
of Mary M. Diller a/k/a Mary
Martin Diller

Nelson Ray Diller and Henry Allen Diller join also in this conveyance to indicate the release of any right to purchase given to them in the Last Will and Testament of Mary M. Diller a/k/a Mary Martin Diller.

WITNESS:

W. L. Harrison

Nelson R. Diller

(SEAL)

Nelson Ray Diller

W. L. Harrison

Henry Allen Diller

(SEAL)

Henry Allen Diller

ACKNOWLEDGEMENT

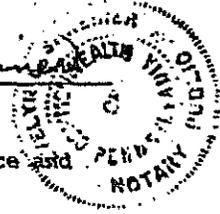
COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF FRANKLIN :

On this, the 16th day of JANUARY, 1996,
before me, a Notary Public, the undersigned officer, personally
appeared Nelson Ray Diller and Henry Allen Diller, Executors
under the Last Will and Testament of Mary M. Diller a/k/a Mary
Martin Diller, deceased, known to me (or satisfactorily proven)
to be the persons whose names are subscribed to the within Deed
and acknowledged that they executed the same for the purposes
therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and official
seal.

Notary Public
Book of Records
My Comm. Expires Feb. 11, 1997

Enchyl S. Shames
NOTARY PUBLIC



I hereby certify that the Grantees' precise residence and
complete post office address is:

COPY

13702 Lewis Hill Road
Weyershoe, PA 17268

Witness my hand this 16th day of January,
1996.

J. Norman Diller

RECORDED ON RECORD

13/50

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF FRANKLIN :

JAN 16 1996

for Franklin
3:25 P.M.

RECORDED in the Office for Recording of Deeds in and for the said
County in Deed Book _____, Page _____.

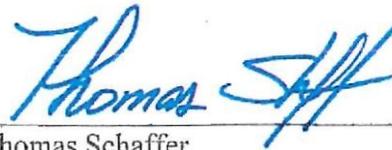
WITNESS my hand and seal of office, this _____ day of _____
Anno Domini, 19____.

ATTACHMENT B

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED

2018 MAY 15 AM 11:43

PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

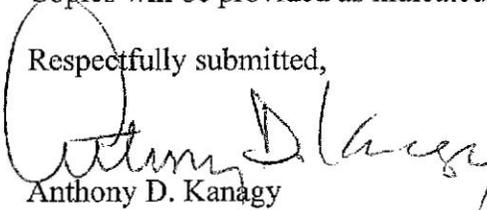
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Joshua L. Diller and Nicole M. Diller in Greene Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,


Anthony D. Kanagy

ADK/jl
Enclosures

Rosemary Chiavetta, Secretary
May 15, 2018
Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

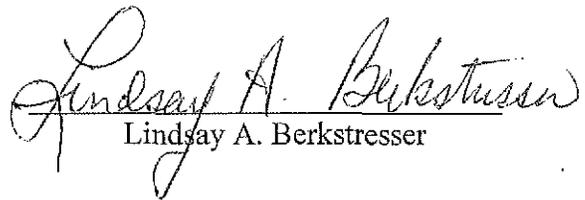
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Joshua L. Diller
Nichole M. Diller
4913 Olde Scotland Road
Shippensburg, PA 17257

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Joshua L. Diller and Nicole M. Diller :
in Greene Township, Franklin County, :
Pennsylvania for the Siting and Construction :
of the 230 kV Transmission Line Associated :
with the **Independence Energy Connection-** :
West Project is Necessary or Proper for the :
Service, Accommodation, Convenience or :
Safety of the Public :
:

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Joshua L. Diller and Nicole M. Diller in Greene Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA's attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by Joshua L. Diller and Nicole M. Diller in Greene Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Joshua L. Diller and Nicole M. Diller property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Joshua L. Diller and Nicole M. Diller. The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission

congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response, Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA’s Maryland affiliate, Transource Maryland, LLC (“Transource MD”), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM’s Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and

Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the

public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at 4913 Olde Scotland Road, Franklin County, Pennsylvania 17257.

32. A deed for the property is recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Instrument Number 201700248 and a copy of said recorded deed is attached hereto as Attachment A.

33. The names and mailing address of the owners of record of said tract of land are Joshua L. Diller and Nicole M. Diller, 4913 Olde Scotland Road, Shippensburg, Pennsylvania 17257.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the Joshua L. Diller and Nicole M. Diller property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Joshua L. Diller and Nicole M. Diller and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Joshua L. Diller and Nicole M. Diller and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of

this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Joshua L. Diller and Nicole M. Diller, who is/are the record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filling 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

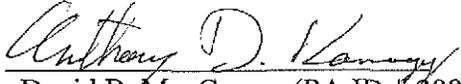
WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Respectfully submitted,

Amanda Riggs Conner (District of Columbia ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcial@aep.com


David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street, 12th Floor
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Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

TAX PARCEL NO. 09-0C09-.016-.000000
4913 OLDE SCOTLAND ROAD, GREENE TWP.

PREPARED BY AND RETURN TO:
MARK E. HALBRUNER, ESQ.
HALBRUNER, HATCH & GUISE LLP
2109 MARKET STREET
CAMP HILL PA 17011

DEED

THIS DEED is made the 27th day of December, in the year two thousand sixteen (2016), between:

VIVIAN L. DILLER, TRUSTEE OF THE DILLER FAMILY TRUST DATED JULY 22, 2005,
party of the first part, **GRANTOR,**

AND

JOSHUA L. DILLER and NICOLE M. DILLER, husband and wife, parties of the second part,
GRANTEES.

WITNESSETH that said party of the first part, for and in consideration of the sum of **ONE AND 00/100 DOLLAR (\$1.00)**, lawful money of the United States of America, well and truly paid by the said parties of the second part to the said party of the first part, at or before the sealing and delivery of these presents, the receipt whereof is hereby acknowledged, has hereby granted, bargained, sold, aliened, enfeoffed, released, conveyed and confirmed, and by these presents does grant, bargain, sell, alien, enfeoff, release, convey and confirm unto the said parties of the second part, their heirs, successors and assigns,

ALL THAT CERTAIN tract of land, and the improvements erected thereon, situate in Greene Township, Franklin County, Pennsylvania, and being shown as the "REMAINING LANDS OF VIVIAN L. DILLER 1344/340 REMAINING AREA = 54.7± AC.", lying on the eastern side of U.S. Interstate Highway 81 on a "Preliminary/Final Subdivision of Land for Vivian I. Diller and Leroy H. Diller", prepared by William A. Brindle Associates, Inc., approved by the Greene Township Board of Supervisors and recorded in Franklin County Plat Book Volume 288J, Page 41.

BEING the residual portion of the same premises which Leroy H. Diller and Vivian L. Diller, his wife, conveyed to Vivian L. Diller by deed dated July 18, 1997, and recorded on August 1, 1997, in Franklin County Record Book 1344, Page 340. By deed dated September 30, 2005, and recorded on October 12, 2005, in Franklin County Record Book 2928, Page 468, Leroy H. Diller and Vivian L. Diller, husband and wife, conveyed the premises (along with other real property) to Leroy H. Diller and Vivian I. Diller, Trustees of the Diller Family Trust dated July 22, 2005. Leroy H. Diller died on July 26, 2011, thereby vesting sole title in Vivian I. Diller, the Grantor herein, as the surviving Trustee. Vivian L. Diller is the same person as Vivian I. Diller.

UNDER AND SUBJECT TO, and together with, any easements, rights-of-way, covenants, conditions, restrictions and other matters of record.

This is a transfer from a living trust during the surviving settlor's lifetime to grantees other than the settlors, and it is therefore treated as if the transfer is being made directly from the settlors to the grantees. 61 Pa. Code §91.156(e)(1). The grantees are the settlors' grandson and the grandson's spouse. A transfer between grandparents and their grandchild and spouse is excluded from realty transfer tax. 72 P.S. §8102-C.3(6); 61 Pa. Code §91.193(b)(6).

TOGETHER with all and singular the buildings and improvements, ways, streets, alleys, driveways, passages, waters, watercourses, rights, liberties, privileges, hereditaments and appurtenances, whatsoever unto the hereby granted premises belonging, or in any wise appertaining, and the reversions and remainders, rents, issues and profits thereof; and all the estate, right, title, interest, property, claim and demand whatsoever of the said Grantor, as well at law as in equity, of, in and to the same.

TO HAVE AND TO HOLD the said lot or piece of ground above-described, with all and singular the buildings and improvements thereon erected, hereditaments and premises hereby granted, or mentioned and intended so to be, with the appurtenances, unto the said Grantees, their heirs and assigns, to and for the only proper use and behoof of the said Grantees, their heirs and assigns forever.

AND the said Grantor, for herself, her heirs, executors and administrators, does covenant, promise and agree, to and with the said Grantees, their heirs and assigns, by these presents, that they, the said Grantor and her heirs, all and singular the hereditaments and premises hereby granted or mentioned and intended so to be, with the appurtenances, unto the said Grantees, their heirs and assigns, against them, the said Grantor and her heirs, and against all and every person and persons whomsoever lawfully claiming or to claim the same or any part thereof, by, from or under him, her, them or any of them, shall and will, subject as aforesaid, specially warrant and forever defend.

The Law Firm of Halbruner, Hatch & Guise, LLP has acted as scrivener only and has not searched the title to the premises herein conveyed.

IN WITNESS WHEREOF, the said party of the first part has hereunto set her hand and seal, the day and year first written above.

SIGNED, SEALED AND DELIVERED
IN THE PRESENCE OF

[Signature]
WITNESS

Vivian I. Diller EE
VIVIAN I. DILLER, TRUSTEE OF THE DILLER
FAMILY TRUST DATED JULY 22, 2005

COMMONWEALTH OF PENNSYLVANIA :
: SS:
COUNTY OF FRANKLIN :

On this, the 27th day of December, 2016, before me, a Notary Public, the undersigned officer, personally appeared **VIVIAN I. DILLER, TRUSTEE OF THE DILLER FAMILY TRUST DATED JULY 22, 2005**, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that she executed the same for the purpose therein contained and that she was authorized to do so on behalf of said trust.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

[Signature]
Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Michele D. Wolff, Notary Public
Chambersburg Boro, Franklin County
My Commission Expires Dec. 15, 2018
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

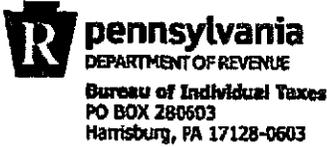
CERTIFICATE OF RESIDENCE

I hereby certify that the present residence of the Grantees herein is as follows:

Joshua L. Diller and Nicole M. Diller
4913 Olde Scotland Road
Shippensburg PA 17257

[Signature]
Agent for Grantees

REV-183 EX (2-15)



REALTY TRANSFER TAX STATEMENT OF VALUE

RECORDER'S USE ONLY

State Tax Paid	0
Book Number	201700248
Page Number	
Date Recorded	1-5-2017

See reverse for instructions.

Complete each section and file in duplicate with Recorder of Deeds when (1) the full value/consideration is not set forth in the deed, (2) the deed is without consideration or by gift, or (3) a tax exemption is claimed. If more space is needed, please attach additional sheets. A Statement of Value (SOV) is not required if the transfer is wholly exempt from tax based on family relationship or public utility easement. However, it is recommended that a SOV accompany all documents filed for recording.

A. CORRESPONDENT - All inquiries may be directed to the following person:

Name Mark E. Halbruner Esq.		Telephone Number: (717) 731-9600	
Mailing Address 2109 Market Street		City Camp Hill	State ZIP Code PA 17011

B. TRANSFER DATA

Date of Acceptance of Document 12/27/2016			
Grantor(s)/Lessor(s) Vivian J. Diller, Trustee	Telephone Number:	Grantee(s)/Lessee(s) Joshua L. and Nicole M. Diller, h/w	Telephone Number:
Mailing Address 4645 Olde Scotland Road		Mailing Address 4913 Olde Scotland Road	
City Chambersburg	State ZIP Code PA 17202	City Shippensburg	State ZIP Code PA 17257

C. REAL ESTATE LOCATION

Street Address 4913 Olde Scotland Road		City, Township, Borough Greene Township	
County Franklin County	School District Chambersburg Area	Tax Parcel Number 09-0C09-016-000000	

D. VALUATION DATA

Was transaction part of an assignment or relocation? Y N

1. Actual Cash Consideration 1.00	2. Other Consideration + 0.00	3. Total Consideration = 1.00
4. County Assessed Value 41,940.00	5. Common Level Ratio Factor x 7.14	6. Computed Value = 299,451.60

E. EXEMPTION DATA - Refer to instructions for exemption status.

1a. Amount of Exemption Claimed \$ 299,451.60	1b. Percentage of Grantor's Interest in Real Estate 100.00 %	1c. Percentage of Grantor's Interest Conveyed 100.00 %
--	---	---

2. Check Appropriate Box Below for Exemption Claimed.

- Will or Intestate succession. _____ (Name of Decedent) _____ (Estate File Number)
- Transfer to a trust. (Attach complete copy of trust agreement identifying all beneficiaries.)
- Transfer from a trust. Date of transfer into the trust September 30, 2005
If trust was amended attach a copy of original and amended trust.
- Transfer between principal and agent/straw party. (Attach complete copy of agency/straw party agreement.)
- Transfers to the commonwealth, the U.S. and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (If condemnation or in lieu of condemnation, attach copy of resolution.)
- Transfer from mortgagor to a holder of a mortgage in default. (Attach copy of mortgage and note/assignment.)
- Corrective or confirmatory deed. (Attach complete copy of the deed to be corrected or confirmed.)
- Statutory corporate consolidation, merger or division. (Attach copy of articles.)
- Other (Please explain exemption claimed.) Deed from living trust during Settlor's lifetime is treated as if made directly from Settlor to grantees. Grantees are Settlor's grandson & wife. 61 Pa. Code 91.156(e)(1) & 91.193(b)(6).

Under penalties of law, I declare that I have examined this statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.

Signature of Correspondent or Responsible Party <i>Mark E. Halbruner</i>	Date 01/03/17
---	------------------

FAILURE TO COMPLETE THIS FORM PROPERLY OR ATTACH REQUESTED DOCUMENTATION MAY RESULT IN THE RECORDER'S REFUSAL TO RECORD THE DEED.



COUNTY OF FRANKLIN
RECORDER OF DEEDS
Linda Miller, Recorder
Courthouse 157 Lincoln Way East
Chambersburg, PA 17201
Phone: (717) 261-3872

* RETURN DOCUMENT TO:
HALBRUNER HATCH & GUISE
LLP

Instrument Number - 201700248
Recorded On 1/5/2017 At 1:55:07 PM

* Instrument Type - DEED
Invoice Number - 150125 User ID - SBW
* Grantor - DILLER, VIVIAN I
* Grantee - DILLER, JOSHUA L

* Total Pages - 5

* FEES

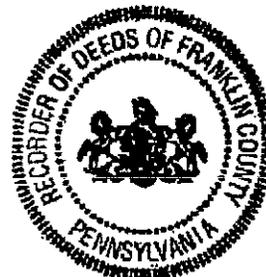
STATE WRIT TAX	\$0.50
STATE JCS/ACCESS TO JUSTICE	\$35.50
COUNTY RECORDING FEE	\$34.00
AFFORDABLE HOUSING	\$11.05
AFFORDABLE HOUSING	\$1.95
COUNTY IMPROVEMENT FEE	\$2.00
ROD IMPROVEMENT FEE	\$3.00
CHAMBERSBURG AREA SCHOOL	\$0.00
DIST REAL TAX	
GREENE TOWNSHIP	\$0.00
TOTAL PAID	\$88.00

This is a certification page
DO NOT DETACH
This page is now part
of this legal document.

Franklin County UPI Verification
UPI Verified On January 5, 2017 By TDS

I hereby CERTIFY that this document is
recorded in the Recorder of Deeds Office
of Franklin County, Pennsylvania.

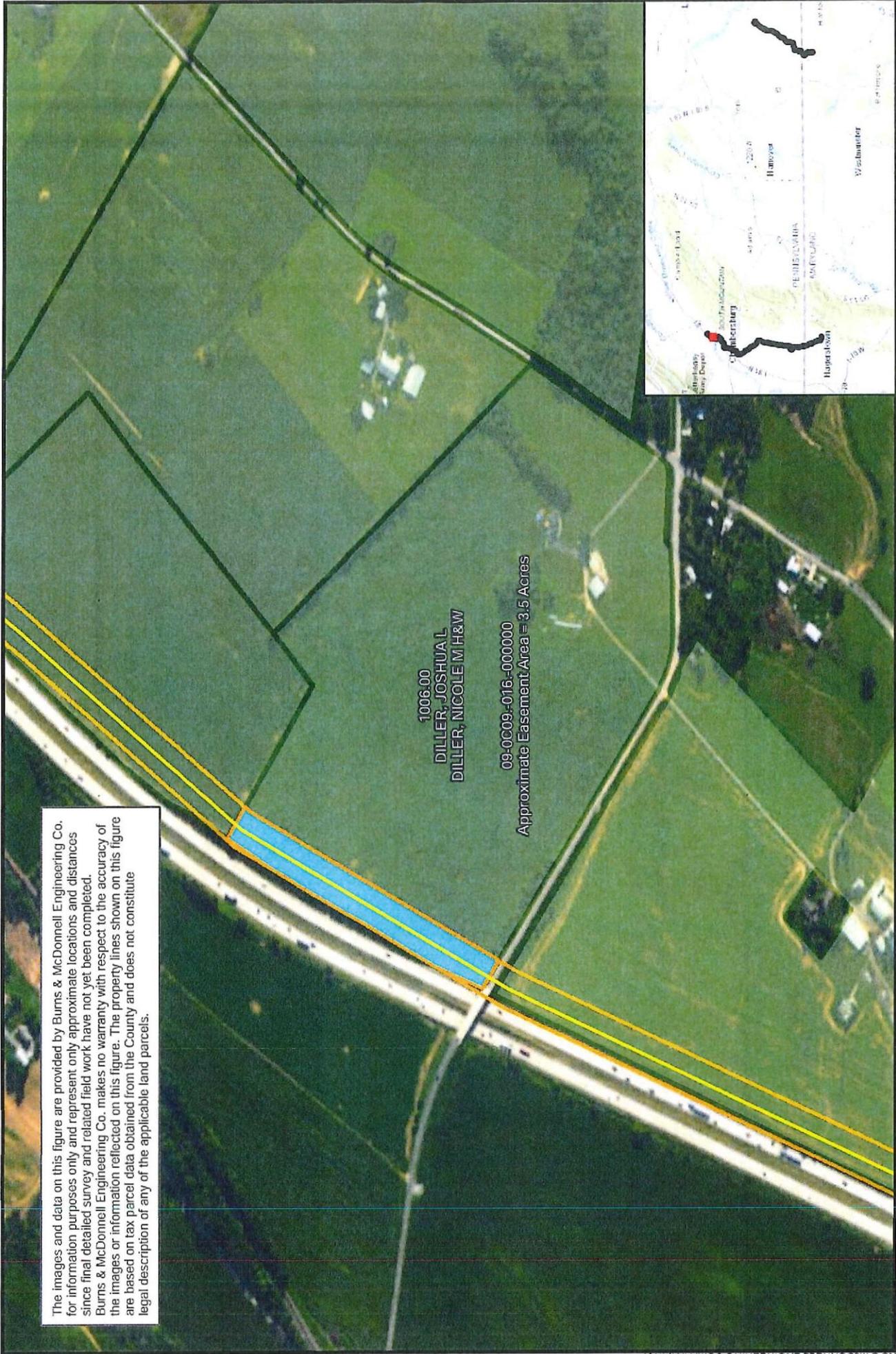
Linda Miller
Recorder of Deeds



* - Information denoted by an asterisk may change during
the verification process and may not be reflected on this page.

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.



1006.00
 DILLER, JOSHUA L.
 DILLER, NICOLE M H&W
 09-0C09-0116-000000
 Approximate Easement Area = 3.5 Acres



EXHIBIT A
 Owner:
 DILLER, JOSHUA L
 Franklin PA
 Parcel ID: 1006.00
 Rice to Ringgold



-  Centerline
-  Parcels
-  Parcel Within ROW
-  ROW Approximately 130'

Source: ESRI and Burns & McDonnell Engineering.

Issued: April, 23 2018

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED

2018 MAY 15 AM 11:43

PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

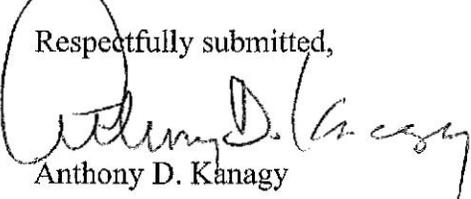
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Lynn D. Etter and Mary W. Etter in Greene Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,


Anthony D. Kanagy

ADK/jl
Enclosures

Rosemary Chiavetta, Secretary
May 15, 2018
Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

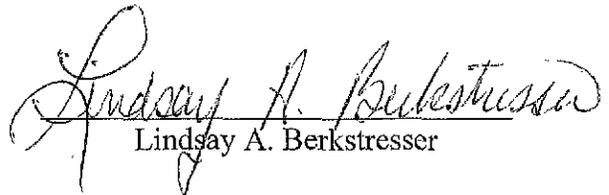
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Lynn D. Etter
Mary W. Etter
5167 Olde Scotland Road
Shippensburg, PA 17257

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Lynn D. Etter and Mary W. Etter in :
Greene Township, Franklin County, :
Pennsylvania for the Siting and Construction :
of the 230 kV Transmission Line Associated :
with the **Independence Energy Connection-** :
West Project is Necessary or Proper for the :
Service, Accommodation, Convenience or :
Safety of the Public :
:

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Lynn D. Etter and Mary W. Etter in Greene Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA's attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by Lynn D. Etter and Mary W. Etter in Greene Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Lynn D. Etter and Mary W. Etter property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Lynn D. Etter and Mary W. Etter. The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission

congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response, Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA’s Maryland affiliate, Transource Maryland, LLC (“Transource MD”), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM’s Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and

Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the

public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at Olde Scotland Road, Shippensburg, Franklin County, Pennsylvania 17257 and a tract of land located at 5167 Olde Scotland Road, Shippensburg, Franklin County, Pennsylvania 17257.

32. A deed for the properties is recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Deed Books 625, Page 828 (for both parcels) and a copy of said recorded deed is attached hereto as Attachment A.

33. *The names and mailing address of the owners of record of said tracts of land are Lynn D. Etter and Mary W. Etter, 5167 Olde Scotland Road, Shippensburg, Pennsylvania 17257.*

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a *burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.*

37. Maps depicting the proposed right-of-ways across the Lynn D. Etter and Mary W. Etter properties are attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tracts of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Lynn D. Etter and Mary W. Etter and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Lynn D. Etter and Mary W. Etter and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of

this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Lynn D. Etter and Mary W. Etter, who is/are the record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Respectfully submitted,



Amanda Riggs Conner (District of Columbia ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

This Deed,

MADE the --- 7th --- day of May
in the year nineteen hundred and sixty-eight (1968).

Between Orval C. Etter, also known as Orville C. Etter, and Helen A. Etter, his wife, of Scotland, Greene Township, Franklin County, Pennsylvania,

GRANTORS,

AND Lynn D. Etter and Mary W. Etter, his wife, of Greene Township, Franklin County, Pennsylvania,

GRANTEES.

Witnesseth That in consideration of the sum of Forty Thousand (\$40,000.00)

Dollars, in hand paid, the receipt whereof is hereby acknowledged, the said grantor do hereby grant and convey - in fee simple - to said grantees

All the following described two tracts of real estate lying and being situate in Greene Township, Franklin County, Pennsylvania, bounded and limited as follows:

TRACT NO. 1

BEGINNING at a point in the Pennsylvania Railroad, formerly the Cumberland Valley Right-of-Way, thence by lands formerly of Susan Punston, now Bruce S. Crouse, South 53 degrees 5 minutes East, 137 perches to a lime stone in road leading from Scotland to Shippensburg; thence across said road and by lands formerly of John C. Plummer, now Clyde Martin, and lands formerly of Mrs. Nellie G. Royer, now Wayne C. Coldsmith, South 53 degrees 57 minutes East, 181.7 perches to a lime stone, formerly a stump; thence by lands of Walter Coldsmith and Russell Coldsmith, North 89 degrees 20 minutes West, 99.5 perches to a lime stone; thence by lands of Russell Coldsmith, Charles Coldsmith, Jay Young and Walter Coldsmith, South 43 1/2 degrees West, 70.5 perches to a sand stone; thence by lands formerly of Garner E. Dayton, now William Myers, North 43 degrees West, 32.25 perches to a sand stone; thence by same, North 78 1/2 degrees West, about 12 perches to a stone at the south side of the public road; thence across said road and by lands formerly of J.M. Young, now William Gaston, North 2 degrees East, 5.7 perches to a stone; thence by same and lands of Kenneth Gaston, North 78 degrees West, 35.25 perches to a stone in the public road leading from Scotland to Shippensburg; thence in said road by lands formerly of Earl Culbertson, now Leroy H. Diller, North 26 degrees East, 29.25 perches to a lime stone; thence by said lands of Leroy H. Diller, North 38 1/2 degrees West, 85.03 perches to a post of fence; thence by lands formerly of H.C. Stamey, now the Grantors herein, Tract No. 2 hereinafter described, North 43 1/2 degrees East, 62.8 perches to a post of fence; thence by same, North 33 degrees 22 minutes West, 71.4 perches to the place of beginning. Containing 140 acres and 37 perches as per survey made for John A. Etter by John R. McIlroy, C.S., dated March 13, 1918.

BEING THE SAME REAL ESTATE which William C. Hazlett, single, by deed dated March 23, 1938, and recorded among the Deed Records of Franklin County, Pennsylvania, in Deed Book Volume 266, Page 79, conveyed to Orville C. Etter and Helen A. Etter, his wife, Grantors herein.

TRACT NO. 2

BEGINNING at a point on the eastern right-of-way line of Pennsylvania Route No. 799, (Interstate 81), at corner of lands formerly of Earl H. Culbertson, now Leroy H. Diller; thence by the eastern right-of-way line of Pennsylvania Route No. 799, North 26 degrees 28 minutes East, 154 feet to a point;

(over)

thence by the same, North 24 degrees 2 minutes East, 142 feet to a point; thence by the same, North 33 degrees 32 minutes East, 243 feet to a point; thence by the same, North 50 degrees 31 minutes East, 68.87 feet to a point; thence by the same, North 32 degrees 55 minutes East, 283.76 feet to a point; thence by the same, North 69 degrees 35 minutes East, 51.19 feet to a point; thence by the same, North 34 degrees 52 minutes East, 300.24 feet to a point; thence by the same, North 31 degrees 27 minutes East, 50.25 feet to a point; thence by the same, North 37 degrees 10 minutes East, 396 feet to a point at other lands of Orval C. Etter and Helen A. Etter, his wife, Grantors herein, Tract No. 1 hereinafter described; thence by said lands, South 33 degrees 22 minutes East, 896 feet to an iron pin; thence by the same and by lands of Leroy H. Diller, South 43 degrees 15 minutes West, 1267.7 feet to an iron pin at lands formerly of Earl H. Culbertson, now Leroy H. Diller; thence by said lands of Diller, North 56 degrees 22 minutes West, 603.5 feet to a point, the place of beginning. Containing 24.638 acres as shown by survey and draft of John Howard McClellan, R.E., C.S., dated April 11, 1963 and recorded among the Deed Records of Franklin County, Pennsylvania, in Deed Book Volume 371, Page 450.

BEING THE SAME REAL ESTATE which Orval C. Show and Mary F. Show, his wife, by Deed dated May 17, 1963 and recorded among said Deed Records in Deed Book Volume 57, Page 449, conveyed to Orval C. Etter and Helen A. Etter, his wife, Grantors herein.

The Grantors herein are the parents of Lynn D. Etter, Grantee herein.

COPY

And the said grantor will warrants - - - generally - - - the property hereby conveyed.

In witness whereof said grantors ha ve hereunto set their hands and seal s, the day and year first above written.

Scaled and delivered in the presence of

Orval C. Ettet (SEAL)
Orville C. Ettet (SEAL)
Helen A. Ettet (SEAL)

COPY

Received on the day of the date of the within or foregoing Deed, of the above named grantees, the within mentioned consideration

Witness: Orval C. Ettet, Orville C. Ettet, Helen A. Ettet
State of Pennsylvania,
County of Franklin

On this 7th day of May, 1968
before me, a Notary Public in and for said State and County, personally came the above named Orval C. Ettet, Orville C. Ettet, and Helen A. Ettet, his wife, known to me (or satisfactorily proven) to be the persons whose names are subscribed to the within instrument and acknowledged the foregoing deed to be their act and deed, and desired the same to be recorded as such.

Witness my hand and official seal, the day and year aforesaid.



My commission expires December 6, 1971
I maintain my office in Chambersburg, Franklin County, Pennsylvania

Commonwealth of Pennsylvania, ss.

County of ... Franklin

Recorded in the office for Recording of Deeds, in and for the County of Franklin in Deed Book 625 page 828

Witness my Hand and Seal of Office, this 7th day of May Anno Domini, 1968

Paul W. ... recorded

No. 18,800

DEED

OSVALD C. EITZ, s/w/o
OSWALD C. EITZ, and
HELEN A. EITZ, his wife,
GRANTORS,

TO
LINDA D. EITZ and
MARY W. EITZ, his wife,
GRANTEES

Dated: May 7, 1968

For: real estate, lying and being situated in Greene Twp., Franklin Co., Pa.

Consideration: \$40,000.00

Recorded:

Notary for Pennsylvania: Paul W. Franklin, Recorder for Franklin Co.

Witness my hand this 7th day of May 1968

I do hereby Certify that Grantee's precise residence and complete post office address is RT. # 3 Shippenburg, Pa. Witness my hand this 7th day of May 1968 *Linda D. Eitz*

This Deed,

MADE the ----- 7th ----- day of May
in the year nineteen hundred and sixty-eight (1968).

Between Orval C. Etter, also known as Orville C. Etter, and Helen A. Etter, his wife, of Scotland, Greene Township, Franklin County, Pennsylvania,
GRANTORS,

AND Lynn D. Etter and Mary W. Etter, his wife, of Greene Township, Franklin County, Pennsylvania,
GRANTEES.

Witnesseth That in consideration of the sum of Forty Thousand (\$40,000.00)

Dollars, in hand paid, the receipt whereof is hereby acknowledged, the said grantor do hereby grant and convey - in fee simple - to said grantees

All the following described two tracts of real estate lying and being situate in Greene Township, Franklin County, Pennsylvania, bounded and limited as follows:

TRACT NO. 1

BEGINNING at a point in the Pennsylvania Railroad, formerly the Cumberland Valley Right-of-Way; thence by lands formerly of Susan Funston, now Bruce S. Crouse, South 53 degrees 5 minutes East, 137 perches to a lime stone in road leading from Scotland to Shippensburg; thence across said road and by lands formerly of John C. Plasterer, now Clyde Martin, and lands formerly of Mrs. Nellie G. Royer, now Wayne C. Goldsmith, South 53 degrees 57 minutes East, 181.7 perches to a lime stone, formerly a stump; thence by lands of Walter Goldsmith and Russell Goldsmith, North 89 degrees 20 minutes West, 99.5 perches to a lime stone; thence by lands of Russell Goldsmith, Charles Goldsmith, Jay Young and Walter Goldsmith, South 43 1/2 degrees West, 70.5 perches to a sand stone; thence by lands formerly of Garner E. Dayton, now William Myers, North 43 degrees West, 32.25 perches to a sand stone; thence by same, North 78 1/2 degrees West, about 12 perches to a stone at the south side of the public road; thence across said road and by lands formerly of J.M. Young, now William Gaston, North 2 degrees East, 6.7 perches to a stone; thence by same and lands of Kenneth Gaston, North 78 degrees West, 35.25 perches to a stone in the public road leading from Scotland to Shippensburg; thence in said road by lands formerly of Earl Culbertson, now Leroy H. Diller, North 26 degrees East, 29.25 perches to a lime stone; thence by said lands of Leroy H. Diller, North 38 1/2 degrees West, 86.03 perches to a post of fence; thence by lands formerly of H.C. Stamey, now the Grantors herein, Tract No. 2 hereinafter described, North 43 1/2 degrees East, 62.8 perches to a post of fence; thence by same, North 33 degrees 22 minutes West, 71.4 perches to the place of beginning. Containing 140 acres and 37 perches as per survey made for John A. Etter by John R. McElroy, C.S., dated March 13, 1914.

BEING THE SAME REAL ESTATE which William C. Hazlett, single, by deed dated March 23, 1938, and recorded among the Dead Records of Franklin County, Pennsylvania, in Deed Book Volume 256, Page 79, conveyed to Orville C. Etter and Helen A. Etter, his wife, Grantors herein.

TRACT NO. 2

BEGINNING at a point on the eastern right-of-way line of Pennsylvania Route No. 799, (Interstate 81), at corner of lands formerly of Earl H. Culbertson, now Leroy H. Diller; thence by the eastern right-of-way line of Pennsylvania Route No. 799, North 26 degrees 28 minutes East, 154 feet to a point;

(over)

thence by the same, North 24 degrees 2 minutes East, 142 feet to a point; thence by the same, North 33 degrees 32 minutes East, 243 feet to a point; thence by the same, North 50 degrees 33 minutes East, 68.87 feet to a point; thence by the same, North 32 degrees 55 minutes East, 283.76 feet to a point; thence by the same, North 49 degrees 35 minutes East, 51.19 feet to a point; thence by the same, North 34 degrees 52 minutes East, 306.24 feet to a point; thence by the same, North 31 degrees 27 minutes East, 50.25 feet to a point; thence by the same, North 37 degrees 10 minutes East, 306 feet to a point at other lands of Orval C. Etter and Helen A. Etter, his wife, Grantors herein, Tract No. 1 hereinbefore described; thence by said lands, South 33 degrees 22 minutes East, 896 feet to an iron pin; thence by the same and by lands of Leroy H. Diller, South 43 degrees 15 minutes West, 1267.7 feet to an iron pin at lands formerly of Earl H. Culbertson, now Leroy H. Diller; thence by said lands of Diller, North 54 degrees 32 minutes West, 605.5 feet to a point, the place of beginning. Containing 24.630 acres as shown by survey and draft of John Howard McClellan, R.S., C.S., dated April 11, 1963 and recorded among the Deed Records of Franklin County, Pennsylvania, in Deed Book Volume 571, Page 450.

BEING THE SAME REAL ESTATE which Grover C. Shew and Mary F. Shew, his wife, by Deed dated May 17, 1963 and recorded among said Deed Records in Deed Book Volume 571, Page 449, conveyed to Orval C. Etter and Helen A. Etter, his wife, Grantors herein.

The Grantors herein are the parents of Lynn D. Etter, Grantee herein.

And the said grantor will warrant - - - generally - - - the property hereby conveyed.

In witness whereof said grantors have hereunto set their hands and seal, the day and year first above written.

Sealed and delivered in the presence of

Orval C. Etter (SEAL)
Orville C. Etter (SEAL)
Helen A. Etter (SEAL)
Marion H. Rice
Marion H. Rice
Marion H. Rice

Received on the day of the date of the within or foregoing Deed, of the above named grantees, the within mentioned consideration

Witness:

Orval C. Etter
Orville C. Etter
Helen A. Etter
Marion H. Rice
Marion H. Rice
Marion H. Rice

State of Pennsylvania,

County of Franklin

On this 7th day of May, 1968 before me, a Notary Public in and for said State and County, personally came the above named Orval C. Etter, a/k/a Orville C. Etter, and Helen A. Etter, his wife, known to me (or satisfactorily proven) to be the persons whose names are subscribed to the within instrument and acknowledged the foregoing deed to be their act and deed, and desired the same to be recorded as such.

Witness my hand ... and official ... seal, the day and year aforesaid.

Marion H. Rice
NOTARY PUBLIC



My commission expires December 6, 1971
I maintain my office in Chambersburg
Franklin County, Pennsylvania

Commonwealth of Pennsylvania, ss.

County of Franklin

Recorded in the office for Recording of Deeds, in and for the County of Franklin in Deed Book 625 page 831

Witness my Hand and Seal of Office, this 7th day of May Anno Domini, 1968

Paul W. Miller Recorder

No. 18.8.0.

DEED

ORVAL C. ETTER, s/w/
ORVAL C. ETTER, and
HELEN A. ETTER, his wife,
GRANTORS.

T O

LYNN D. ETTER and
MARY W. ETTER, his wife,
GRANTEES.

Dated May 7, 1968.

For real estate lying and being
situate in Greene Twp., Franklin
Co., Pa.
Consideration \$40,000.00

Recorded

Entered for Record in the Recorder's
Office for Franklin Co., Pa.
MAY 7 1968

PAUL W. MILLER
Recorder for Franklin Co.
Treas. 5.30

I do hereby Certify that Grantees precise residence and complete post office address is RT. # 3
Shippensburg, Pa.
Witness my hand this 7th
day of May 1968
Lynn D. Etter

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.



EXHIBIT A
 Owner:
 ETTER, LYNN D
 Franklin PA
 Parcel ID: 1005.00
 Rice to Ringgold



- Centerline
- Parcel Within ROW
- Parcels
- ROW Approximately 130'

Source: ESRI and Burns & McDonnell Engineering.

Issued: April, 23 2018

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED
2018 MAY 15 AM 11:40
PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Charles Stamy Fox in Guilford Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/sme
Enclosures

Rosemary Chiavetta, Secretary

May 15, 2018

Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

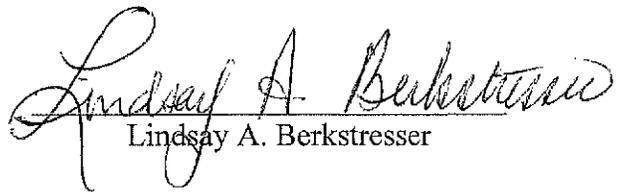
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Charles Stamy Fox
37 Fifth Avenue
Chambersburg, PA 17201

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Charles Stamy Fox in Guilford :
Township, Franklin County, Pennsylvania for :
the Siting and Construction of the 230 kV :
Transmission Line Associated with the :
Independence Energy Connection-West :
Project is Necessary or Proper for the Service, :
Accommodation, Convenience or Safety of the :
Public :
:

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Charles Stamy Fox in Guilford Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA's attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by Charles Stamy Fox in Guilford Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Charles Stamy Fox property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Charles Stamy Fox. The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response, Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM's 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA's Maryland affiliate, Transource Maryland, LLC ("Transource MD"), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM's Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at Church Road, Chambersburg, Franklin County, Pennsylvania 17202.

32. A deed for the property is recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Deed Book 566, Page Number 845 and a copy of said recorded deed is attached hereto as Attachment A.

33. The name and mailing address of the owner of record of said tract of land is Charles Stamy Fox, 37 Fifth Avenue, Chambersburg, Pennsylvania 17201.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the Charles Stamy Fox property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. §

1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Charles Stamy Fox and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Charles Stamy Fox and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Charles Stamy Fox, who is/are the record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

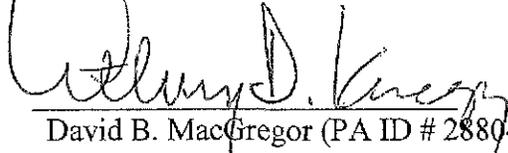
43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

Respectfully submitted,



Amanda Riggs Conner (District of Columbia ID # 481740)

Hector Garcia (VA ID # 48304)

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, OH 43215

Phone: 614-716-3410

Fax: 614-716-1613

E-mail: arconner@aep.com

E-mail: hgarcia1@aep.com

David B. MacGregor (PA ID # 28804)

Anthony D Kanagy (PA ID # 85522)

Lindsay A. Berkstresser (PA ID # 318370)

Post & Schell, P.C.

17 North Second Street, 12th Floor

Harrisburg, PA 17101-1601

Phone: 717-731-1970

Fax: 717-731-1985

E-mail: dmacgregor@postschell.com

E-mail: akanagy@postschell.com

E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

This Deed,

MADE the 3rd day of January, in the year nineteen hundred and sixty-two.

Halfsegen Karl H. Stull, Jr. and Pauline M. Stull, his wife, of Guilford Township, Franklin County, Pennsylvania, GRANTORS,

and

Charles Steacy Fox, of the Borough of Chambersburg, Franklin County, Pennsylvania, GRANTEE.

Witnesseth That in consideration of One (\$1.00) Dollar and other valuable consideration -----

Dollars, in hand paid, the receipt whereof is hereby acknowledged, the said grantors do hereby grant and convey in fee simple to said grantee

All the following described real estate lying and being situate in Guilford Township, Franklin County, Pennsylvania, bounded and limited as follows:

TRACT A. BEGINNING at an iron pin at the corner of Tract B herein; thence with Tract B, South 65 degrees 15 minutes East 475 feet to an iron pin at lands of G. A. Fox and wife; thence with the same, South 10 degrees 45 minutes West 117.2 feet to an iron pin; thence by land of the grantors, North 31 degrees 48 minutes West 223.6 feet to an iron pin in a road; thence along the said road, North 31 degrees 48 minutes West 886.5 feet to an iron pin at the Grindstone Hill Road; thence through the same, North 24 degrees 02 minutes East 599.4 feet to an iron pin, the place of beginning, CONTAINING an area of 10 1/2 acres, as shown by survey of Harry Knox, R. E., made for the Grantors October 20, 1961.

BEING a portion of a larger tract of land which Kenneth G. Meister and Anna M. Meister, his wife, by their deed dated October 24, 1957, and recorded in the deed records of Franklin County, Pennsylvania, in Deed Book Vol. 496, Page 782, conveyed to Earl H. Stull, Jr., and Pauline M. Stull, his wife, Grantors herein.

TRACT B. BEGINNING at an iron pin at the corner of Tract No. 1 on a draft made for Kenneth G. Meister and Anna M. Meister by Harry Knox, dated April 7, 1960; thence with the said Tract No. 1, South 65 degrees 45 minutes East 316.5 feet to an iron pin; thence by land of G. A. Fox and wife, South 24 degrees 30 minutes West 330.1 feet to an iron pin at a stone; thence by the same, South 11 degrees West 713 feet to an iron pin at other land of the grantors; thence by the same, North 66 degrees 15 minutes West 475 feet to a spike in the public road; thence through the said public road, North 24 degrees 15 minutes East 1025.8 feet to an iron pin in the said road, the place of beginning, CONTAINING 8 1/2 acres, as shown by survey of Harry Knox, R. E., made for the grantors, dated April 7, 1960.

BEING the same tract of land which Anna M. Meister, widow, by her deed dated May 5, 1960, and recorded in the deed records of Franklin County, Pennsylvania, in Deed Book Vol. 534, Page 384, conveyed to Earl H. Stull, Jr. and Pauline M. Stull, his wife, grantors herein.



PWM
11-9-62

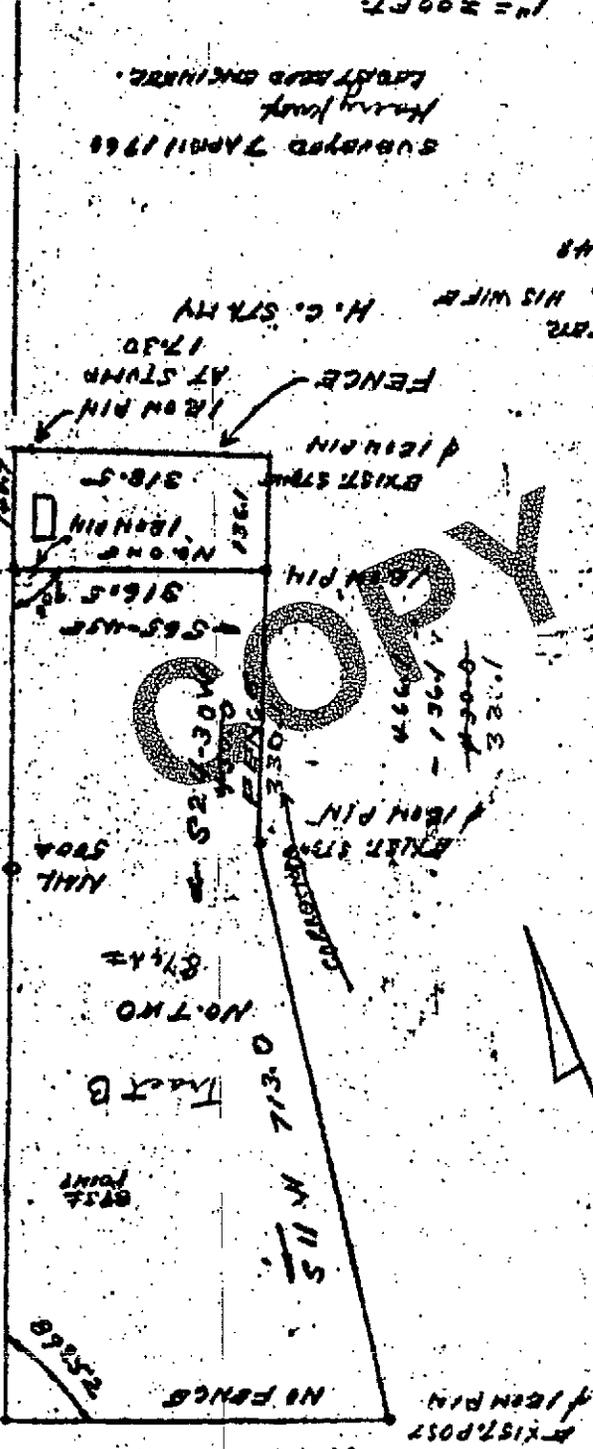


This is Deed # 8081

KENNETH B. NIXON
ANNA M. NIXON HIS WIFE
H. C. ST. MY
V. 237 P. 148
CULP. 7.11.18
FRANKLIN CO.
PENNSYLVANIA.

Surveyed 7 April 1968
Harry Nix
Earl Reed Engineer.

1" = 200 FT.



100' N. EAST OF
APP. 8.000

1166.5
-140.7
1025.8

N 24-15 E 1025.8

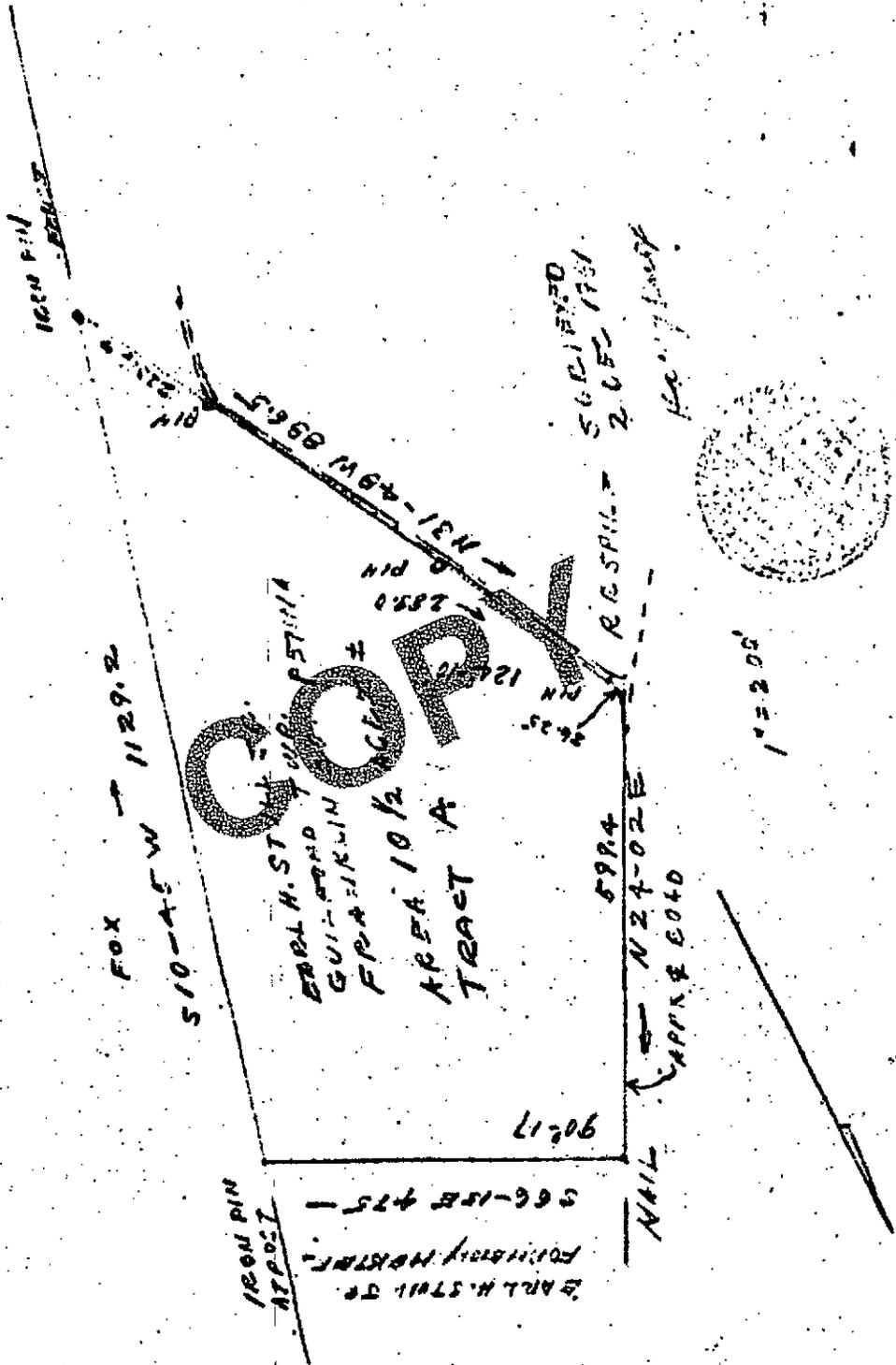
TRACT B
NO. 7 NO. 81442

S 11 W 713.0

WALL H. STULL TR.
N 66-15 W 475

GRINOSTONE
HILL

This land part of farm described on Deed # 8301



And the said grantors will warrant generally the property hereby conveyed.

In witness whereof said grantors have hereunto set their hand and seal, the day and year first above written.

Scaled and delivered in the presence of

Gestanda Greenawalt
as to each

Earl H. Stull, Jr. [SEAL]
Earl H. Stull, Jr.
Pauline M. Stull [SEAL]
Pauline M. Stull

Commonwealth of Pennsylvania,
County of Franklin,

ss.

On this, the 3rd day of January, 1962,
before me, Gestanda Greenawalt, the undersigned
officer, personally appeared Earl H. Stull, Jr. and Pauline M. Stull, his wife,

known to me (or satisfactorily proven) to be the persons whose names
subscribed to the within instrument, and acknowledged that _____ executed
the same for the purposes therein contained.

In Witness Whereof I hereunto set my hand and official seal.

Gestanda Greenawalt
Notary Public

My commission expires Jan. 7, 1963.

I maintain my office in the Borough of
Chambersburg, Franklin County, Pennsylvania.



I do hereby certify that Grantee precise residence is _____

37 Fifth Ave. Chambersburg Pa.

Witness my hand this ninth day of November, 1962

Charles A. Foy

Commonwealth of Pennsylvania } ss.
County of Franklin

Recorded in the office for Recording of Deeds, in and for the County of
Franklin in Deed Book 566 Page 275

Witness my Hand and Seal of Office, this 9th day of
Nov. Anno Domini, 1962

Paul W. Martin, recorder

<p><u>S/</u> <u>F/</u> No. <u>43574</u></p>	<p>DEED</p>	<p>Earl H. Stull, Jr. and Pauline M. Stull, his wife, to</p>	<p>Charles Steacy Fox</p>	<p>Dated _____ For real estate situate in Gull- ford Twp., Franklin Co., Penna. Consideration One (\$1.00) Dollar and other consideration. Recorded _____</p>	<p>Entered for Record in the Recorder's Office of _____ EMERGED ON RECORD NOV-9-1962 F. W. B. MARTIN Recorder for Franklin Co. Tax _____ Fee <u>50</u></p>
---	--------------------	--	---------------------------	---	---

COPY

Commonwealth of Pennsylvania } ss.
County of Franklin

_____ being duly sworn, hereby states that
he is connected with the transaction between _____
and _____, in the capacity of _____,
and that the true, full, complete and actual value of such transaction as
required by "Tax on Deeds Resolution of 19_____ of School Board of
_____ & Pa. Realty Transfer Tax Act of 19_____

\$ _____
Sworn and subscribed to before me this _____ day of _____
A. D. 19_____

*Receipt 46.95
file 11.95
5.50*

School District of Gullford
Township, Franklin County, Pa.
"Tax on Deeds Resolution, 1962
Amount of Tax 46.95
Received Payment Paul W. Martin
Collector

ATTACHMENT B

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED

2018 MAY 15 AM 11:40

PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Edna S. Fox and Charles A. Fox in Guilford Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/sme
Enclosures

Rosemary Chiavetta, Secretary
May 15, 2018
Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

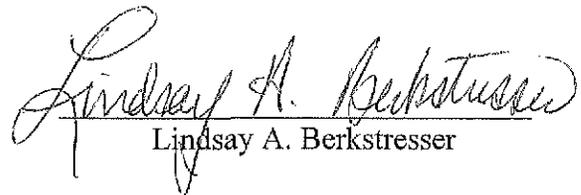
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Edna S. Fox
Charles A. Fox
37 Fifth Avenue
Chambersburg, PA 17201

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Edna S. Fox and Charles A. Fox in :
Guilford Township, Franklin County, :
Pennsylvania for the Siting and Construction :
of the 230 kV Transmission Line Associated :
with the **Independence Energy Connection-** :
West Project is Necessary or Proper for the :
Service, Accommodation, Convenience or :
Safety of the Public :
:

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Edna S. Fox and Charles A. Fox in Guilford Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA's attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by Edna S. Fox and Charles A. Fox in Guilford Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Edna S. Fox and Charles A. Fox property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Edna S. Fox and Charles A. Fox.

The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response,

Transource Energy, the parent of Transource PA, submitted "Project 9A." The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM's 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA's Maryland affiliate, Transource Maryland, LLC ("Transource MD"), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM's Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at Church Road, Chambersburg, Franklin County, Pennsylvania 17202.

32. A deed for the property is recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Deed Book 307, Page Number 630 and a copy of said recorded deed is attached hereto as Attachment A.

33. The names and mailing address of the owners of record of said tract of land are Edna S. Fox and Charles A. Fox, 37 Fifth Avenue, Chambersburg, Pennsylvania 17201.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the Edna S. Fox and Charles A. Fox property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. §

1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Edna S. Fox and Charles A. Fox and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Edna S. Fox and Charles A. Fox and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Edna S. Fox and Charles A. Fox, who is/are the record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filling 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

Amanda Riggs Conner (District of Columbia ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

Respectfully submitted,



David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

THIS DEED Made the 26 day of March 1943, between Guy W. Stamy and Anna M. Stamy, his wife, A. Maude Stamy, single, Guilford township, Alice S. Kretzer and Clyde E. Kretzer, her husband, Quincy township, Mary Benedict and A. Russell Benedict, her husband, Antrim township, Edna S. Fox and Charles A. Fox, her husband, Chambersburg, Franklin County, Harry C. Stamy, Jr., and Grace H. Stamy, his wife, Camp Hill, John F. Stamy and Mary F. Stamy, his wife, Newville, Cumberland County, A. Reese Stamy and Caroline P. Stamy, his wife, Etters, York County, all of Pennsylvania, and A. Maude Stamy, attorney in fact for Lloyd Franklin Stamy, GRANTORS, and Edna S. Fox and Charles A. Fox, her husband, of Chambersburg, Franklin County, Pennsylvania, GRANTEES.

WITNESSETH That in consideration of Eleven Thousand Eight Hundred Sixty and fifty-five hundredth Dollars (\$11,860.55) and other valuable considerations, in hand paid, the receipt whereof is hereby acknowledged, the said Grantors do hereby grant and convey in fee simple to said Grantees

All the following described real estate lying and being situate in Guilford Township, Franklin County, Pennsylvania, bounded and limited as follows, to wit: Beginning at a stone in the middle of the public road leading from Guilford station toward New Guilford; thence by lands of Christian Miller, formerly Joseph Rouse, north twenty-four and one-fourth ($24\frac{1}{4}$) degrees east ninety-eight and two tenths (98.2) perches to a black oak at land of Carl Wilderson, formerly William Myers, thence along the latter south fifty-one and one-half ($51\frac{1}{2}$) degrees east one hundred eleven and five tenths (111.5) perches to a stone in a private road; thence along the same south thirty and one-fourth ($30\frac{1}{4}$) degrees, west one hundred fifty-seven (157) perches to a stone; thence by the same south seven and one-half ($7\frac{1}{2}$) degrees, west thirty-seven (37) perches to a stone at land of Nancy Metz, formerly E. H. McFerrer; thence along the latter south sixty-six (66) degrees, west seventy-two and one tenth (72.1) perches to a stone at land of Sadie Kaufman, formerly Jacob Holsinger; thence along the latter and land of Kenneth Meister, formerly S. S. Baker,

north ten and three-fourth (10 3/4) degrees, east one hundred fifty and one tenth (150.1) perches to a stone; thence along the latter north twenty-four and three-fourth (24 3/4) degrees, east twenty-eight (28) perches to a stone; thence by the same north sixty-five (65) degrees, west nineteen and four tenth (19.4) perches to the stone at place of beginning, containing one hundred seventeen (117) acres and sixty-nine (69) perches, neat measure, as appears by draft of S. V. Wingert, C. S., from survey made by him October 19, 1893, being a portion of the same tract of land patented to Daniel Poorman and Abraham Coble, executors of Jacob Heck, deceased, by letter dated January 17, 1798, and by said executors conveyed to John Snider (or Schnsider, Jr.) by deed dated January 16, 1819, Vol. 12, page 159, and by him devised to his son, John H. Snider, who having died seized thereof testate was conveyed by Jeremiah Gelwicks and Peter Knepper, executors of the last Will and Testament of said John H. Snider, deceased, by deed dated 21 March, 1896, Vol. 105, page 293, to Harry C. Stamy, who having died 18 November, 1941, intestate seized thereof the same descended to and vested in the Grantors herein, who are his sole heirs at law, children of the said Harry C. Stamy, deceased, except John F. Stamy and Lloyd Franklin Stamy, who are the only children of John F. Stamy, a deceased son of the said Harry C. Stamy, deceased.

And the said Grantors will warrant generally the property hereby conveyed.

IN WITNESS WHEREOF said Grantors have hereunto set their hands and seals, the day and year first above written.

Sealed and delivered in the presence of

<u>Edmund R. Kline</u>	A.M.S. <u>Guy W. Stamy</u> (SEAL)
<u>as to and</u>	A.M.S. <u>Anna M. Stamy</u> (SEAL)
<u></u>	A.M.S. <u>A. Maude Stamy</u> (SEAL)
<u></u>	A.M.S. <u>Alice J. Weigee</u> (SEAL)
<u></u>	C.F.M. <u>Wm. J. ...</u> (SEAL)

_____ M. B. Mary Benedict (SEAL)
 _____ A. R. B. A. Russell Benedict (SEAL)
 _____ E. S. F. Edna S. Fox (SEAL)
 _____ C. A. F. Charles A. Fox (SEAL)
 _____ H. C. S. Jr. Harry C. Stamy (SEAL)
 _____ G. H. S. Grace H. Stamy (SEAL)
 _____ J. F. S. John F. Stamy (SEAL)
 _____ M. F. S. Mary F. Stamy (SEAL)
 _____ A. R. S. A. Revere Stamy (SEAL)
 _____ C. P. S. Caroline P. Stamy (SEAL)
 _____ A. M. S. A. Maude Stamy (SEAL)

STATE OF PENNSYLVANIA)
 COUNTY OF FRANKLIN)

ss: **COPIES**
 Attorney-in-fact for Lloyd Frank-
 lin Stamy

On this 26 day of March 1948, before me,
 the subscriber, a notary public within and
 for said state and county having n office at No. 146
 Street Lincoln Way East, Chambersburg, ***** in said county,
 came the above named Guy W. Stamy and Anna M. Stamy, his wife, A.
 Maude Stamy, single, Alice S. Kretzer and Clyde E. Kretzer, her
 husband, Mary Benedict and A. Russell Benedict, her husband, Edna
 S. Fox and Charles A. Fox, her husband, Harry C. Stamy, Jr., and
 Grace H. Stamy, his wife, John F. Stamy and Mary F. Stamy, his wife,
 A. Revere Stamy and Caroline P. Stamy, his wife, and each acknowledged
 the foregoing deed to be his and her act and deed and desired the
 same to be recorded as such.

And also came the above named A. Maude Stamy, attorney-in-fact
 for Lloyd Franklin Stamy and in her own name and in the name of her

constituent, the above named Edna Franklyn Stamy acknowledged the foregoing deed to be her act and deed and the act and deed of her said constituent and desired the same to be recorded as such.

In Testimony Whereof I have hereunto set my hand and affixed my official seal the day and year first above written.

Edna Franklyn Stamy

Notary Public

My Commission expires March 7, 1945.



I do hereby Certify that Grantee's residence is 37 5th Avenue
Chambersburg, Pa.
Witness my hand this 7th
day of April, 1943
Edna Franklyn Stamy



COPY

Stamy 12.5.46
134

DEED	TO Guy W. Stamy, et. al. Edna S. Fox and Charles A. Fox, her husband		ENTERED ON RECORD APR 5 1943 JOSEPH S. RAHAUSEN RECORDER FOR FRANKLIN CO. PA. PAID ARTHUR W. GILLAN ATTORNEY AT LAW CHAMBERSBURG, PA.
------	--	--	--

This Photo taken from the original
May 12, 1943
Joseph S. Rahauser, Recorder Per. LSY.

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

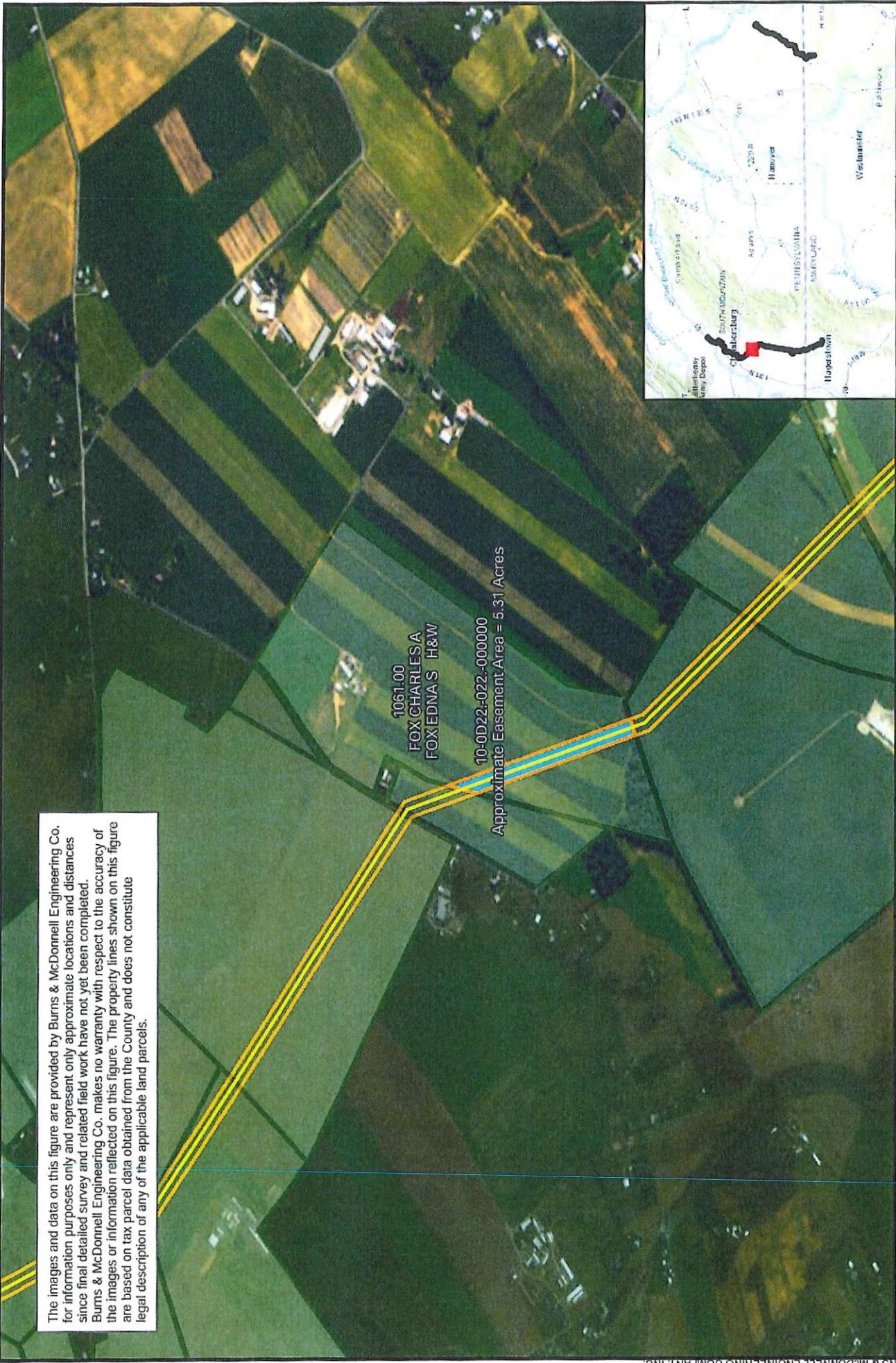
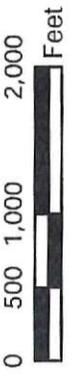


EXHIBIT A

Owner:
FOX CHARLES A
 Franklin PA
 Parcel ID: 1061.00
 Rice to Ringgold



Source: ESRI and Burns & McDonnell Engineering.

-  Centerline
-  Parcel Within ROW
-  Parcels
- ROW Approximately 130'

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018

A handwritten signature in blue ink that reads "Thomas Schaffer". The signature is written in a cursive style with a horizontal line underneath it.

Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED
2018 MAY 15 AM 11:18
PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Michael D. Frederick and Tammy Jo Salter in Guilford Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/sme
Enclosures

Rosemary Chiavetta, Secretary
May 15, 2018
Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

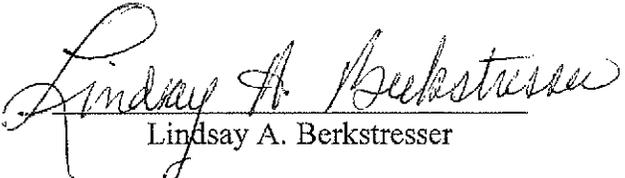
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Michael D. Frederick
Tammy Jo Salter
1218 Golden West Way
Lusby, MD 20657

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Michael D. Frederick and Tammy Jo :
Salter in Guilford Township, Franklin County, :
Pennsylvania for the Siting and Construction :
of the 230 kV Transmission Line Associated :
with the **Independence Energy Connection-** :
West Project is Necessary or Proper for the :
Service, Accommodation, Convenience or :
Safety of the Public :
:

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Michael D. Frederick and Tammy Jo Salter in Guilford Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA's attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcial@aep.com

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by Michael D. Frederick and Tammy Jo Salter in Guilford Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Michael D. Frederick and Tammy Jo Salter property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Michael D. Frederick and Tammy Jo

Salter. The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response,

Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA’s Maryland affiliate, Transource Maryland, LLC (“Transource MD”), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM’s Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at 4429 Altenwald Road, Waynesboro, Franklin County, Pennsylvania 17268.

32. A deed for the property is recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Instrument Number 201021887 and a copy of said recorded deed is attached hereto as Attachment A.

33. The names and mailing address of the owners of record of said tract of land are Michael D. Frederick and Tammy Jo Salter, 1218 Golden West Way, Lusby, Maryland 20657.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the Michael D. Frederick and Tammy Jo Salter property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. §

1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Michael D. Frederick and Tammy Jo Salter and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Michael D. Frederick and Tammy Jo Salter and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Michael D. Frederick and Tammy Jo Salter, who is/are the record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

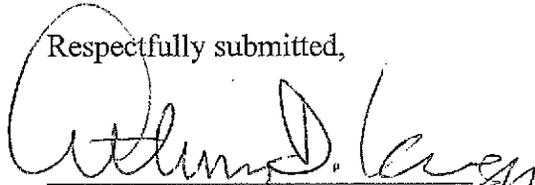
43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

Respectfully submitted,



Amanda Riggs Conner (District of Columbia ID # 481740)

Hector Garcia (VA ID # 48304)

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, OH 43215

Phone: 614-716-3410

Fax: 614-716-1613

E-mail: arconner@aep.com

E-mail: hgarcial@aep.com

David B. MacGregor (PA ID # 28804)

Anthony D Kanagy (PA ID # 85522)

Lindsay A. Berkstresser (PA ID # 318370)

Post & Schell, P.C.

17 North Second Street, 12th Floor

Harrisburg, PA 17101-1601

Phone: 717-731-1970

Fax: 717-731-1985

E-mail: dmacgregor@postschell.com

E-mail: akanagy@postschell.com

E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

DEED OF DISTRIBUTION

THIS DEED made the 18th day of October, 2001,

BETWEEN

Michael D. Frederick, Executor of the Estate of Mabel A. Frederick, a/k/a Mabel Ann Frederick, late of Guilford Township, Franklin County, Pennsylvania, hereinafter called **GRANTOR**,

Michael D. Frederick, of Greensburg, PA, and Tammy Jo Salter, of Chambersburg, PA, as tenants in common, hereinafter called **GRANTEES**,

WHEREAS, Mabel A. Frederick, died testate on November 22, 1999, having first made her Last Will and Testament dated January 25, 1983, which will was duly admitted to probate by the Register of Wills of Franklin County, Pennsylvania, on December 22, 1999, and is recorded in Franklin County Will Book Volume 164, Page 581;

WHEREAS, in said will Mabel A. Frederick, appointed her son, Michael D. Frederick, as Executor of her estate and the said Michael D. Frederick was duly appointed to act as such on December 22, 1999;

WHEREAS, the said Mabel A. Frederick, did under the aforesaid will give, devise and bequeath the residue of her estate, unto her husband, Ralph D. Frederick, and in the event her said husband predeceased her, she gave the same unto her two children, Michael D. Frederick and Tammy Jo Frederick, (now Tammy Jo Salter), the Grantees herein;

WHEREAS, the said Ralph D. Frederick predeceased Mabel A. Frederick, on November 2, 1995;

WHEREAS, the said Michael D. Frederick, as Executor, by this deed intends to convey unto himself and Tammy Jo Frederick (now Tammy Jo Salter), the real estate devised to them under said will of Mabel A. Frederick;

WITNESSETH, that in consideration of One (\$1.00) Dollar in hand paid, the receipt whereof is hereby acknowledged, the said Grantor does hereby grant and convey in fee simple, to the said Grantees,

ALL the following described real estate lying and being situate in Guilford Township, Franklin County, Pennsylvania, bounded and limited as follows:

BEGINNING at a point in the center of Guilford Township Road No. 400; thence along lands now or formerly of Wilbur B. and Irene C. Frederick, North 77 degrees 30 minutes East 200 feet to an iron pin; thence continuing along other lands now or formerly of Wilbur B. Frederick and Irene C. Frederick, South 12 degrees 30 minutes East 220 feet to an iron pin; thence continuing along other lands now or formerly of Wilbur B. Frederick and wife, South 77 degrees 30 minutes West 200 feet to a point in the center of the aforementioned road; thence along the center of the aforementioned road, North 12 degrees 30 minutes West 220 feet to the point at the place of beginning; CONTAINING 44,000 square feet, according to survey of William A. Brindle, R.S., dated July 8, 1971.

BEING the same real estate which Wilbur B. Frederick and Irene C. Frederick, his wife, by deed dated August 20, 1971, and recorded in Franklin County Deed Book Volume 664, Page 1011, conveyed to Ralph D. Frederick and Mabel Ann Frederick, his wife. The said Ralph D. Frederick died on November 2, 1995, complete title thereby vesting in his wife, Mabel Ann Frederick. The said Mabel Ann Frederick died on November 22, 1999, having first made her Last Will and Testament dated January 25, 1983, which will was duly admitted to probate by the Register of Wills of Franklin County, Pennsylvania on December 22, 1999, and on the same date Letters Testamentary were granted to Michael D. Frederick, the Grantor herein.

THERE IS HEREBY RESERVED for road purposes a strip of land along the front of this lot 25 feet wide measured from the center of Guilford Township Road No. 400.

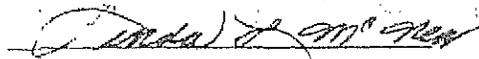
SUBJECT to all other conditions, restrictions, and reservations of record.

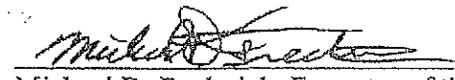
THIS IS A TRANSFER FROM THE ESTATE OF MOTHER TO HER SON AND DAUGHTER, AND IS THEREFORE TAX-EXEMPT.

AND the said Grantor will warrant specially the property hereby conveyed.

IN WITNESS WHEREOF, said Grantor has hereunto set his hand and seal the day and year first above written.

WITNESS:

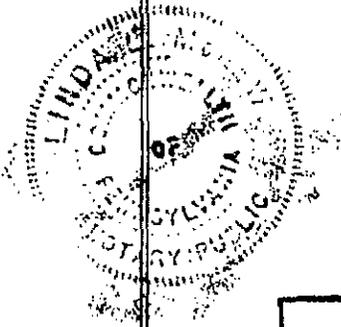


 (SEAL)
Michael D. Frederick, Executor of the
Estate of Mabel A. Frederick, Deceased

COMMONWEALTH OF PENNSYLVANIA :
: **SS**
COUNTY OF FRANKLIN :

On this, the 18th day of Oct., 2001, before me, a Notary Public, the undersigned officer, personally appeared Michael D. Frederick, Executor of the Estate of Mabel A. Frederick, Deceased, (known to me or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.



COPY

Linda L. McNew
Notary Public

My commission expires _____
I maintain my office in _____

Notarial Seal
Linda L. McNew, Notary Public
Chambersburg Pa. Franklin County
My Commission Expires Oct. 20, 2001

Notarial Seal
Linda L. McNew, Notary Public
Chambersburg Pa. Franklin County
My Commission Expires Oct. 20, 2001

I hereby certify that the Grantees' precise residence and complete post office address is:

c/o Tammy Jo Salter
2509 Country Road
Chambersburg, PA 17201

Date: Oct 18, 2001

Tammy Jo Salter

REV-103 EK (11-92)



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
BUREAU OF INDIVIDUAL TAXES
DEPT. 280603
HARRISBURG, PA 17128-0603

**REALTY TRANSFER TAX
STATEMENT OF VALUE**

See Reverse for Instructions

RECORDER'S USE ONLY	
State Tax Paid	- 0 -
Book Number	201021887
Page Number	
Date Recorded	11/5/2010

Complete each section and file in duplicate with Recorder of Deeds when (1) the full value/consideration is not set forth in the deed, (2) when the deed is without consideration, or by gift, or (3) a tax exemption is claimed. A Statement of Value is not required if the transfer is wholly exempt from tax based on: (1) family relationship or (2) public utility easement. If more space is needed, attach additional sheet(s).

A CORRESPONDENT All inquiries may be directed to the following:

Name	David C. Cleaver	Telephone Number:	
Street Address	1035 Wayne Avenue	Area Code ()	
City	Chambersburg	State	PA
Zip Code	17201		

B TRANSFER DATA

Grantor(s)/Lessor(s)	Michael D. Frederick, Executor of the Estate of Mabel A. Frederick	Date of Acceptance of Document	
Street Address		Grantee(s)/Lessee(s)	Michael D. Frederick & Tammy Jo Salter
City		Street Address	c/o Tammy Jo Salter 2509 Country Road
State		City	Chambersburg
Zip Code		State	PA
		Zip Code	17202

C PROPERTY LOCATION

Street Address	4429 Altenwald Road	City, Township, Borough	Guilford Township (Chambersburg)
County	Franklin County	School District	Chambersburg
		Tax Parcel Number	

D VALUATION DATA

1. Actual Cash Consideration	.00	2. Other Consideration		3. Total Consideration	=
4. County Assessed Value		5. Common Level Ratio Factor	X	6. Fair Market Value	=

E EXEMPTION DATA

1a. Amount of Exemption Claimed		1b. Percentage of Interest Conveyed	
---------------------------------	--	-------------------------------------	--

2. Check Appropriate Box Below for Exemption Claimed

- Will or intestate succession Mabel A. Frederick 28-99-0626
(Name of Decedent) (Estate File Number)
- Transfer to Industrial Development Agency.
- Transfer to a trust. (Attach complete copy of trust agreement identifying all beneficiaries.)
- Transfer between principal and agent. (Attach complete copy of agency/straw party agreement.)
- Transfers to the Commonwealth, the United States and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (If condemnation or in lieu of condemnation, attach copy of resolution.)
- Transfer from mortgagor to a holder of a mortgage in default. Mortgage Book Number _____, Page Number _____
- Corrective or confirmatory deed. (Attach complete copy of the prior deed being corrected or confirmed.)
- Statutory corporate consolidation, merger or division. (Attach copy of articles.)
- Other (Please explain exemption claimed, if other than listed above.) Over 30 Days Old

Under penalties of law, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.

Signature of Correspondent or Responsible Party	Date
<i>Tammy Jo Salter</i>	Nov 5, 2010

FAILURE TO COMPLETE THIS FORM PROPERLY OR ATTACH APPLICABLE DOCUMENTATION MAY RESULT IN THE RECORDER'S REFUSAL TO RECORD THE DEED.



COUNTY OF FRANKLIN
RECORDER OF DEEDS
Linda Miller, Recorder
Courthouse 157 Lincoln Way East
Chambersburg, PA 17201
Phone: (717) 261-3872

*** RETURN DOCUMENT TO:**
DAVID CLEAVER

Instrument Number - 201021887
Recorded On 11/5/2010 At 2:16:01 PM

* Instrument Type - DEED
Invoice Number - 26562 User ID - DSS
* Grantor - FREDERICK, MABEL A
* Grantee - FREDERICK, MICHAEL D

* Total Pages - 5

*** FEES**

STATE WRIT TAX	\$0.50
STATE JCS/ACCESS TO JUSTICE	\$23.50
COUNTY RECORDING FEE	\$14.00
AFFORDABLE HOUSING	\$11.05
AFFORDABLE HOUSING	\$1.95
COUNTY IMPROVEMENT FEE	\$2.00
ROD IMPROVEMENT FEE	\$3.00
CHAMBERSBURG AREA SCHOOL	\$0.00
DIST REAL TAX	
GUILFORD TOWNSHIP	\$0.00
TOTAL PAID	\$56.00

COPY

This is a certification page
DO NOT DETACH
This page is now part
of this legal document.

I hereby CERTIFY that this document is recorded in the Recorder of Deeds Office of Franklin County, Pennsylvania.

Linda Miller
Linda Miller
Recorder of Deeds



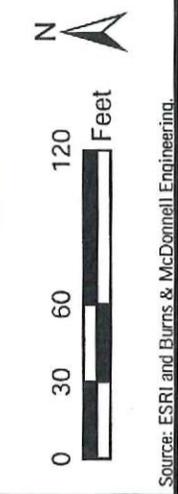
* - Information denoted by an asterisk may change during the verification process and may not be reflected on this page.

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.



EXHIBIT A
 Owner:
FREDERICK MICHAEL D
 Franklin PA
 Parcel ID: 1069.00
 Rice to Ringgold



-  Centerline
-  Parcels
-  Parcel Within ROW
-  ROW Approximately 130'

Source: ESRI and Burns & McDonnell Engineering.

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED
2018 MAY 15 AM 11:19
PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Michael D. Frederick and Tamra D. Frederick and Tammy Jo Salter and Roderick C.B. Salter in Guilford Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/sme
Enclosures

Rosemary Chiavetta, Secretary

May 15, 2018

Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

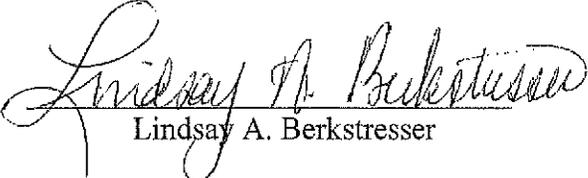
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Michael D. Frederick
Tamra D. Frederick
Roderick C.B. Salter
Tammy Jo Salter
1218 Golden West Way
Lusby, MD 20657

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Michael D. Frederick and Tamra D. :
Frederick and Tammy Jo Salter and Roderick :
C.B. Salter in Guilford Township, Franklin :
County, Pennsylvania for the Siting and :
Construction of the 230 kV Transmission Line :
Associated with the **Independence Energy** :
Connection-West Project is Necessary or :
Proper for the Service, Accommodation, :
Convenience or Safety of the Public :

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Michael D. Frederick and Tamra D. Frederick and Tammy Jo Salter and Roderick C.B. Salter in Guilford Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA's attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcial@aep.com

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by Michael D. Frederick and Tamra D. Frederick and Tammy Jo Salter and Roderick C.B. Salter in Guilford Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Michael D. Frederick and Tamra D. Frederick and Tammy Jo Salter and Roderick C.B. Salter property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Michael D. Frederick and Tamra D.

Frederick and Tammy Jo Salter and Roderick C.B. Salter. The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response,

Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA’s Maryland affiliate, Transource Maryland, LLC (“Transource MD”), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM’s Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at Altenwald Road, Waynesboro, Franklin County, Pennsylvania 17268.

32. A deed for the property is recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Deed Book 1809, Page Number 105 and Instrument Number 201021886 and a copy of said recorded deed is attached hereto as Attachment A.

33. The names and mailing address of the owners of record of said tract of land are Michael D. Frederick and Tamra D. Frederick and Tammy Jo Salter and Roderick C.B. Salter, 1218 Golden West Way, Lusby, Maryland 20657.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the Michael D. Frederick and Tamra D. Frederick and Tammy Jo Salter and Roderick C.B. Salter property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to

date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Michael D. Frederick and Tamra D. Frederick and Tammy Jo Salter and Roderick C.B. Salter and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Michael D. Frederick and Tamra D. Frederick and Tammy Jo Salter and Roderick C.B. Salter and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Michael D. Frederick and Tamra D. Frederick and Tammy Jo Salter and Roderick C.B. Salter, who is/are the record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2)

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Respectfully submitted,

Amanda Riggs Conner (District of Columbia ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com


David B. MacGregor (PA ID # 28804)
Anthony D. Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

DEED OF DISTRIBUTION

THIS DEED made the 18th day of October 2001,

BETWEEN

Michael D. Frederick, Executor of the Estate of Mabel A. Frederick, a/k/a Mabel Ann Frederick, late of Guilford Township, Franklin County, Pennsylvania, hereinafter called **GRANTOR**,

AND

Michael D. Frederick, of Greensburg, PA, and Tammy Jo Salter, of Chambersburg, PA, as tenants in common, hereinafter called **GRANTEES**,

WHEREAS, Mabel A. Frederick, died testate on November 22, 1999, having first made her Last Will and Testament dated January 25, 1983, which will was duly admitted to probate by the Register of Wills of Franklin County, Pennsylvania, on December 22, 1999, and is recorded in Franklin County Will Book Volume 164, Page 581;

WHEREAS, in said will Mabel A. Frederick, appointed her son, Michael D. Frederick, as Executor of her estate and the said Michael D. Frederick was duly appointed to act as such on December 22, 1999;

WHEREAS, the said Mabel A. Frederick, did under the aforesaid will give, devise and bequeath the residue of her estate, unto her husband, Ralph D. Frederick, and in the event her said husband predeceased her, she gave the same unto her two children, Michael D. Frederick and Tammy Jo Frederick, (now Tammy Jo Salter), the Grantees herein;

WHEREAS, the said Ralph D. Frederick predeceased Mabel A. Frederick, on November 2, 1995;

WHEREAS, the said Michael D. Frederick, as Executor, by this deed intends to convey unto himself and Tammy Jo Frederick (now Tammy Jo Salter), the real estate devised to them under said will of Mabel A. Frederick;

WITNESSETH, that in consideration of One (\$1.00) Dollar in hand paid, the receipt whereof is hereby acknowledged, the said Grantor does hereby grant and convey in fee simple,

WITNESSETH, that in consideration of One (\$1.00) Dollar in hand paid, the receipt whereof is hereby acknowledged, the said Grantor does hereby grant and convey in fee simple, to the said Grantee, all of the decedent's undivided one-half (1/2) interest in the within described real estate:

ALL the following described two (2) contiguous tracts of real estate, together with the improvements on Tract No. 1, lying and being situate in Guilford Township, Franklin County, Pennsylvania, bounded and limited as follows:

TRACT NO. 1:

BEGINNING at a point formerly marked by a hickory at corner of lands now or formerly of Cora Angle and Donald Plasterer and Clara Plasterer, his wife, and the tract hereby conveyed; thence by lands now or formerly of Cora Angle, North 11-1/4 degrees West 16.1 perches to a stone at corner of Tract No. 2 hereinafter described; thence by Tract No. 2 hereinafter described, South 82-1/4 degrees West 28.25 perches to a point now or formerly marked by a stone in the middle of the public road known as Altenwald Road on line of lands now or formerly of George Crider and Margaret Crider, his wife; thence along said public road by lands now or formerly of George Crider and wife, and Ida Strait, South 12 degrees East 16.64 perches to an iron pin at corner of lands now or formerly of Donald Plasterer and Clara Plasterer, his wife; thence by lands now or formerly of Donald Plasterer and wife, North 81-1/4 degrees East 28 perches to the point, the place of beginning, containing two (2) acres and 139 perches, neat measure.

TRACT NO. 2:

BEGINNING at a stone in the public road known as Altenwald Road at Tract No. 1 described above; thence by the latter, North 82-1/2 degrees East 28.25 perches to a stone at lands now or formerly of Cora Angle; thence by the latter, North 11-1/4 degrees West 54.75 perches to a stone; thence by lands now or formerly of Richard Peck and Fern Peck, his wife, and Herbert Cordell, South 85-1/2 degrees West 29.1 perches to a stone in the aforementioned public road; thence in said public road by lands now or formerly of Ralph D. Frederick and wife, South 12 degrees East 56.56 perches to the stone at Tract No. 1 described above, the place of beginning, containing ten (10) acres and eighteen (18) perches, more or less.

BEING the same real estate which Irene C. Frederick, by deed dated June 11, 1990, and recorded in Franklin County Deed Book Volume 1085, Page 283, conveyed to Ralph D. Frederick and Mabel Ann Frederick, his wife, and Beulah E. George and Roy B. George, her husband. The said Ralph D. Frederick died on November 2, 1995, complete title in their one-half interest in said real estate

the Register of Wills of Franklin County, Pennsylvania on December 22, 1999, and on the same date Letters Testamentary were granted to Michael D. Frederick, the Grantor herein.

THERE IS EXCEPTED from Tract No. 2 above and not included in this conveyance that portion thereof which Wilbur B. Frederick and Irene C. Frederick, his wife, by their deed dated April 20, 1971, and recorded in Franklin County Deed Book Volume 664, Page 1011, conveyed to Ralph D. Frederick and Mabel Ann Frederick, his wife.

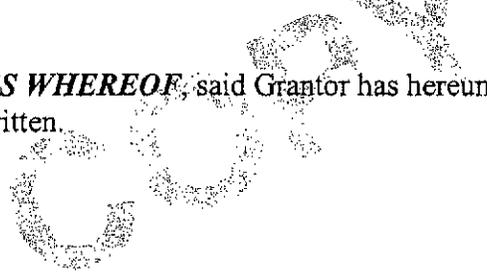
SUBJECT to all other conditions, restrictions, and reservations of record.

THIS IS A TRANSFER FROM THE ESTATE OF MOTHER TO HER SON AND DAUGHTER, AND IS THEREFORE TAX-EXEMPT.

AND the said Grantor will warrant specially the property hereby conveyed.

IN WITNESS WHEREOF, said Grantor has hereunto set his hand and seal the day and year first above written.

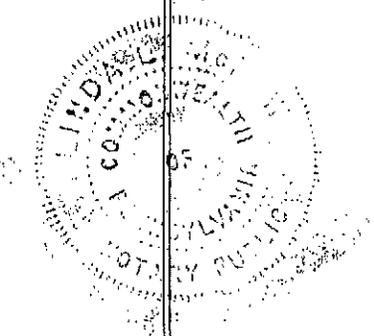
WITNESS:

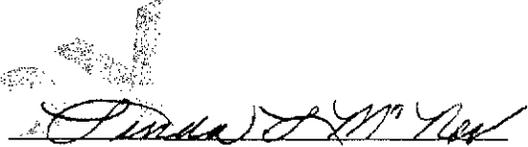

[Signature] *[Signature]* (SEAL)
Michael D. Frederick, Executor of the
Estate of Mabel A. Frederick, Deceased

COMMONWEALTH OF PENNSYLVANIA :
: **SS**
COUNTY OF FRANKLIN :

On this, the 18th day of Oct, 2001, before me, a Notary Public, the undersigned officer, personally appeared Michael D. Frederick, Executor of the Estate of Mabel A. Frederick, Deceased, (known to me or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.




Notary Public

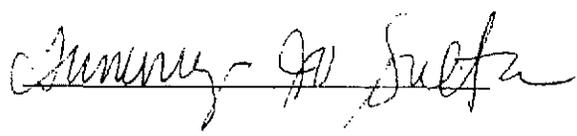
My commission expires _____
I maintain my office in _____

Notarial Seal
Linda L. McNew, Notary Public
Chambersburg Boro, Franklin County
My Commission Expires Oct. 20, 2001

I hereby certify that the Grantees' precise residence and complete post office address is:

c/o Tammy Jo Salter
2509 Country Road
Chambersburg, PA 17202

Date: Oct. 18, 2001





COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
BUREAU OF INDIVIDUAL TAXES
DEPT. 280603
HARRISBURG, PA 17128-0603

REALTY TRANSFER TAX STATEMENT OF VALUE

See Reverse for Instructions

RECORDER'S USE ONLY	
State Tax Paid	- 0 -
Book Number	201021886
Page Number	
Date Recorded	11/5/2010

Complete each section and file in duplicate with Recorder of Deeds when (1) the full value/consideration is not set forth in the deed, (2) when the deed is without consideration, or by gift, or (3) a tax exemption is claimed. A Statement of Value is not required if the transfer is wholly exempt from tax based on: (1) family relationship or (2) public utility easement. If more space is needed, attach additional sheet(s).

A CORRESPONDENT - All inquiries may be directed to the following person:

Name	David C. Cleaver	Telephone Number	
Street Address	1035 Wayne Avenue	Area Code ()	
City	Chambersburg	State	PA
Zip Code			17201

B TRANSFER DATA

Grantor(s)/Lessor(s)	Michael D. Frederick, Executor of the Estate of Mabel A. Frederick	Date of Acceptance of Document	
Grantee(s)/Lessee(s)		Street Address	2509 Country Road
Street Address		City	Chambersburg
City		State	PA
State		Zip Code	17202

C PROPERTY LOCATION

Street Address	4699 Altenwald Road	City, Township, Borough	Guilford Township (Chambersburg)
County	Franklin County	School District	Chambersburg
		Tax Parcel Number	

D VALUATION DATA

1. Actual Cash Consideration	.00	2. Other Consideration	+	3. Total Consideration	=
4. County Assessed Value		5. Common Level Ratio Factor	X	6. Fair Market Value	=

E EXEMPTION DATA

1a. Amount of Exemption Claimed		1b. Percentage of Interest Conveyed	
---------------------------------	--	-------------------------------------	--

2. Check Appropriate Box Below for Exemption Claimed

- Will or intestate succession Mabel A. Frederick 28-99-0626
(Name of Decedent) (Estate File Number)
- Transfer to Industrial Development Agency.
- Transfer to a trust. (Attach complete copy of trust agreement identifying all beneficiaries.)
- Transfer between principal and agent. (Attach complete copy of agency/straw party agreement.)
- Transfers to the Commonwealth, the United States and Instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (If condemnation or in lieu of condemnation, attach copy of resolution.)
- Transfer from mortgagor to a holder of a mortgage in default. Mortgage Book Number _____, Page Number _____
- Corrective or confirmatory deed. (Attach complete copy of the prior deed being corrected or confirmed.)
- Statutory corporate consolidation, merger or division. (Attach copy of articles.)
- Other (Please explain exemption claimed, if other than listed above.) OVER 30 DAYS OLD

Under penalties of law, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.

Signature of Correspondent or Responsible Party	<u>Tammy Jo Salter</u>	Date	Nov 5, 2010
---	------------------------	------	-------------

FAILURE TO COMPLETE THIS FORM PROPERLY OR ATTACH APPLICABLE DOCUMENTATION MAY RESULT IN THE RECORDER'S REFUSAL TO RECORD THE DEED.



COUNTY OF FRANKLIN
RECORDER OF DEEDS
Linda Miller, Recorder
Courthouse 157 Lincoln Way East
Chambersburg, PA 17201
Phone: (717) 261-3872

*** RETURN DOCUMENT TO:
DAVID CLEAVER**

Instrument Number - 201021886
Recorded On 11/5/2010 At 2:16:00 PM

* Instrument Type - DEED

Invoice Number - 26562 User ID - DSS

* Total Pages - 5

* Grantor - FREDERICK, MABEL A

* Grantee - FREDERICK, MICHAEL D

*** FEES**

STATE WRIT TAX	\$0.50
STATE JCS/ACCESS TO JUSTICE	\$23.50
COUNTY RECORDING FEE	\$14.00
AFFORDABLE HOUSING	\$11.05
AFFORDABLE HOUSING	\$1.95
COUNTY IMPROVEMENT FEE	\$2.00
ROD IMPROVEMENT FEE	\$3.00
CHAMBERSBURG AREA SCHOOL	\$0.00
DIST REAL TAX	
GUILFORD TOWNSHIP	\$0.00
TOTAL PAID	\$56.00

This is a certification page

DO NOT DETACH

This page is now part
of this legal document.

I hereby CERTIFY that this document is
recorded in the Recorder of Deeds Office
of Franklin County, Pennsylvania.

Linda Miller

Linda Miller
Recorder of Deeds



* - Information denoted by an asterisk may change during
the verification process and may not be reflected on this page.

47763
DEED

THIS DEED made the *date* of *January* 2002.

BETWEEN

Bouiah E. George, of 6021 Rock Hill Road, Chambersburg, Pennsylvania, hereinafter called
GRANTOR.

AND

Michael D. Frederick and Tamra D. Frederick, his wife, of 3223 Attleboro Road, Greensburg, Pennsylvania, 15601, an undivided one-half interest as tenants by the entireties, and Tammy Jo Salter and Roderick C. B. Salter, her husband, of 2509 Country Road, Chambersburg, Pennsylvania, 17201, an undivided one-half interest as tenants by the entireties, each undivided one-half interest to be held as tenants in common, hereinafter called **GRANTEES,**

WITNESSETH, that in consideration of Thirty-Eight Thousand Three Hundred Fifty (\$38,350.00) Dollars in hand paid, the receipt whereof is hereby acknowledged, the said Grantor does hereby grant and convey in fee simple, to the said Grantees, all of her undivided one-half (1/2) interest in the within described real estate:

ALL the following described two (2) contiguous tracts of real estate, together with the improvements on Tract No. 1, lying and being situate in Guilford Township, Franklin County, Pennsylvania, bounded and limited as follows:

TRACT NO. 1:

BEGINNING at a point formerly marked by a hickory at corner of lands now or formerly of Cora Angle and Donald Plasterer and Clara Plasterer, his wife, and the tract hereby conveyed; thence by lands now or formerly of Cora Angle, North 11-1/4 degrees West 16.1 perches to a stone at corner of Tract No. 2 hereinafter described; thence by Tract No. 2 hereinafter described, South 82-1/4 degrees West 28.25 perches to a point now or formerly marked by a stone in the middle of the public road known as Altenwald Road on line of lands now or formerly of George Crider and Margaret Crider, his wife; thence along said public road by lands now or formerly of George Crider and wife, and Ida Strait, South 12 degrees East 16.64 perches to an iron pin at corner of lands now or formerly of Donald Plasterer and Clara Plasterer, his wife; thence by lands now or formerly of Donald Plasterer and wife, North 81-

VDL 1809PG 105

RECORDED

01 JAN 23 11 5

LINDA MILLER
RECORDER OF DEEDS
FRANKLIN COUNTY

CONFIDENTIAL

Franklin County - Recorder of Deeds
LINDA MILLER
Instrument Filings

Receipt# 71816

Instr# 2002-04763 1/21/2002 14113743

I hereby CERTIFY that this document is
recorded in the Recorder's Office of
Franklin County, Pennsylvania.

Resubmit: GEORGE BERMAN/FREDERICK MICHAEL
LINDA MILLER, JR



Linda Miller
Linda Miller
Recorder of Deeds

DEED	13.50
DEED - 9817	.50
DEED - 977 STATE	383.50
CHANGERSBURG	191.75
GUILFORD TOWNSHIP	171.75
DEED AFFIDAVIT HS	11.05
DEED A/H PENN FEE	1.95
CD IMPROVEMENT FND	1.00
REC. IMPROVMT FUND	1.00
Docum 153	8796.00
Total Received.....	9796.00

VOL 1809 PG 106

1/4 degree East 28 perches to the point, the place of beginning, containing two (2) acres and 139 perches, neat measure.

TRACT NO. 2:

BEGINNING at a stone in the public road known as Altenwald Road at Tract No. 1 described above; thence by the latter, North 82-1/2 degrees East 28.25 perches to a stone at lands now or formerly of Cora Angle; thence by the latter, North 11-1/4 degrees West 54.75 perches to a stone; thence by lands now or formerly of Richard Peck and Fern Peck, his wife, and Herbert Cordell, South 85-1/2 degrees West 29.1 perches to a stone in the aforementioned public road; thence in said public road by lands now or formerly of Ralph D. Frederick and wife, South 12 degrees East 56.56 perches to the stone at Tract No. 1 described above, the place of beginning, containing ten (10) acres and eighteen (18) perches, more or less.

BEING the same real estate which Irene C. Frederick, by deed dated June 11, 1990, and recorded in Franklin County Deed Book Volume 1035, Page 283, conveyed to Ralph D. Frederick and Mabel Ann Frederick, his wife, and Beulah E. George and Roy B. George, her husband. The said Roy B. George died on March 1, 1993, complete title in his one-half interest in said real estate thereby vesting in his wife, Beulah E. George, the Grantor herein. Ralph D. Frederick died on November 2, 1993, vesting title in his one-half interest in said real estate in his wife, Mabel Ann Frederick. The said Mabel Ann Frederick died on November 22, 1999, having first made her Last Will and Testament dated January 25, 1983, which was duly admitted to probate by the Register of Wills of Franklin County, Pennsylvania on December 22, 1999. By Item 3 of said Last Will and Testament Mabel Ann Frederick conveyed her interest in said real estate to Michael D. Frederick and Tammy Jo Frederick (now Tammy Jo Sahr), and by virtue of this conveyance full and complete title to the within described real estate is fully vested in the Grantees herein.

THERE IS EXCEPTED from Tract No. 2 above and not included in this conveyance that portion thereof which Wilbur B. Frederick and Irene C. Frederick, his wife, by their deed dated April 20, 1971, and recorded in Franklin County Deed Book Volume 664, Page 1011, conveyed to Ralph D. Frederick and Mabel Ann Frederick, his wife.

SUBJECT to all other conditions, restrictions, and reservations of record.

AND the said Grantor will warrant specially the property hereby conveyed.

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IN WITNESS WHEREOF, said Grantor has hereunto set her hand and seal the day and year first above written.

WITNESS:

[Signature]

Boulah E. George (SEAL)
Boulah E. George

COMMONWEALTH OF PENNSYLVANIA

:
: SS

COUNTY OF FRANKLIN

On this, the 30th day of January, 2002, before me, a Notary Public, the undersigned officer, personally appeared Boulah E. George, (known to me or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that she executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.



[Signature]
Notary Public

Notarial Seal
Linda E. McNew, Notary Public
Chambersburg, Pa., Franklin County
My Commission Expires Oct. 21, 2005

I hereby certify that the Grantor's precise residence and complete post office address is:

c/o Tammy Jo Salter
2509 Country Road
Chambersburg, PA 17201

Date: Jan 30, 2002

[Signature]

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

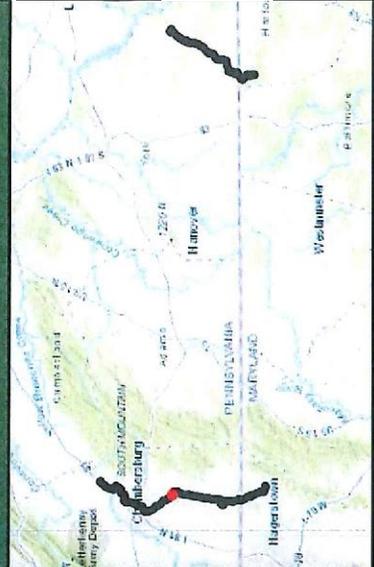
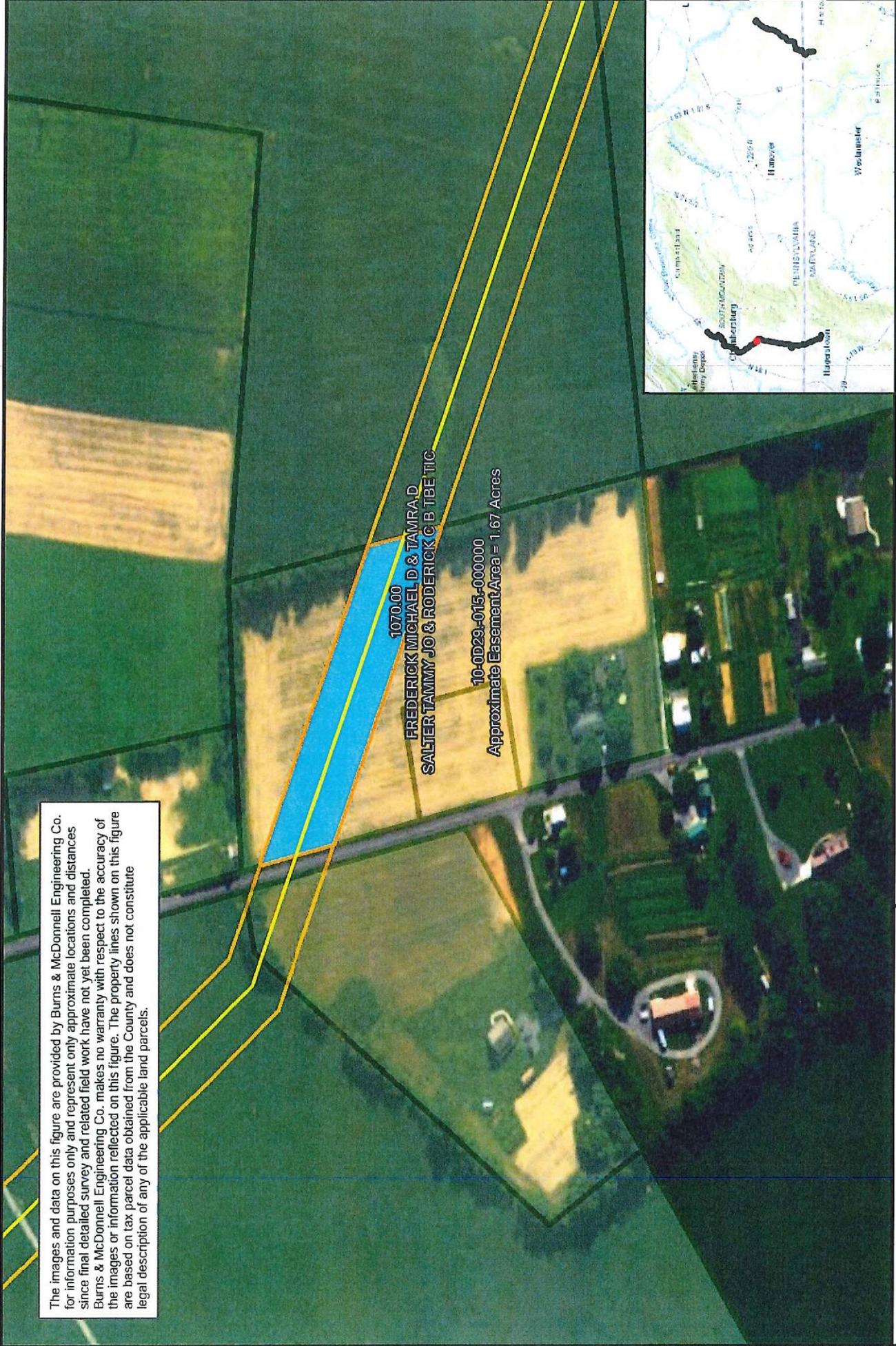
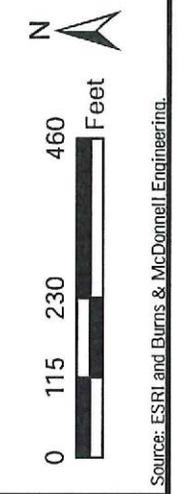


EXHIBIT A
 Owner:
FREDERICK MICHAEL D & TAMRA D
 Franklin PA
 Parcel ID: 1070.00
 Rice to Ringgold



- Centerline
- Parcels
- Parcel Within ROW
- ROW Approximately 130'

Source: ESRI and Burns & McDonnell Engineering.

Issued: April, 23 2018

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED
2018 MAY 15 AM 11:19
PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Mark E. Gayman and Sally A. Gayman in Quincy Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/sme
Enclosures

Rosemary Chiavetta, Secretary
May 15, 2018
Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

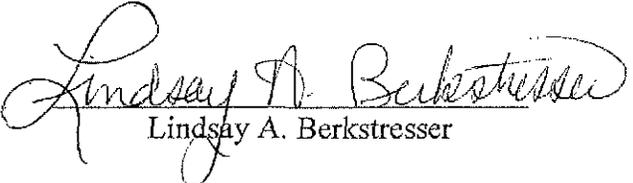
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mark E. Gayman
Sally A. Gayman
5460 Stamey Hill Road
Waynesboro, PA 17268

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Mark E. Gayman and Sally A. :
Gayman in Quincy Township, Franklin :
County, Pennsylvania for the Siting and :
Construction of the 230 kV Transmission Line :
Associated with the **Independence Energy** :
Connection-West Project is Necessary or :
Proper for the Service, Accommodation, :
Convenience or Safety of the Public :
:

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Mark E. Gayman and Sally A. Gayman in Quincy Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA’s address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA’s attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcial@aep.com

Transource PA’s attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC (“Transource Energy”).

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by Mark E. Gayman and Sally A. Gayman in Quincy Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Mark E. Gayman and Sally A. Gayman property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Mark E. Gayman and Sally A. Gayman. The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission

congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response, Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA’s Maryland affiliate, Transource Maryland, LLC (“Transource MD”), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM’s Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and

Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the

public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at 5460 Stamey Hill Road, Waynesboro, Franklin County, Pennsylvania 17268.

32. A deed for the property is recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Instrument Number 201122821 and a copy of said recorded deed is attached hereto as Attachment A.

33. The names and mailing address of the owners of record of said tract of land are Mark E. Gayman and Sally A. Gayman, 5460 Stamey Hill Road, Waynesboro, Pennsylvania 17268.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the Mark E. Gayman and Sally A. Gayman property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Mark E. Gayman and Sally A. Gayman and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Mark E. Gayman and Sally A. Gayman and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of

this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Mark E. Gayman and Sally A. Gayman, who is/are the record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

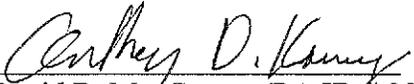
WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Respectfully submitted,

Amanda Riggs Conner (District of Columbia ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcial@aep.com


David B. MacGregor (PA ID # 28804)
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Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

THIS DEED

MADE the 23rd day of November
in the year two thousand eleven (2011)

BETWEEN GRANT K. GAYMAN and LEAH GAYMAN, husband and wife, of 11742
Gehr Road, Waynesboro, Pennsylvania-----GRANTORS

and MARK E. GAYMAN and SALLY A. GAYMAN, husband and wife, of 5460 Stamey Hill
Road, Waynesboro, Pennsylvania-----GRANTEES

WITNESSETH, That in consideration of other good and valuable considerations and the
sum of Two (\$2.00)-----Dollars, in hand paid, the receipt whereof is hereby acknowledged, the
said grantors do hereby grant and convey to the said grantees, in fee simple, an undivided
.027397 interest in

ALL the following described real estate lying and being situate in Quincy Township,
Franklin County, Pennsylvania, bounded and described as follows:

BEGINNING at a point in the center of the intersection of two public township
roads; thence through the center of one of said public township roads leading to
Mont Alto by lands now or formerly of Reuben Daugherty, South 70-3/4 degrees
East 131.9 perches to stones on the north side of said road; thence through said
public road by lands now or formerly of A. J. Saber, South 41-3/4 degrees East
10.6 perches to a point in said road; thence with said road by same, South 47-1/4
degrees East 46.2 perches to a point in said road; thence by land now or formerly
of Roy Benshoff, South 22 degrees 52 minutes West 108 perches to a point at
corner of lands now or formerly of Grace E. Smith; thence by same, North 60
degrees West 35.8 perches to a fence post, formerly a stone; thence by lands now
or formerly of Emma George, North 59-1/2 degrees West 171.9 perches to stones
in public road; thence through said public road by land now or formerly of John
Sollenberger, North 35-1/2 degrees East 95.3 perches to a point at the intersection
of said road and another public road leading to Mont Alto, the place of beginning.
CONTAINING 133 acres, 103 perches, neat measure, according to draft made by
John L. McElroy for Estate of D. H. Yaukey, November 23, 1922, recorded in
Franklin County Deed Book 527, Page 577.

BEING the same real estate conveyed to Grant K. Gayman by deed of Ruth K. Gayman
and Harold C. Gayman, wife and husband, dated December 12, 1997 and recorded in Franklin
County Deed Book 1360, page 573.

This transaction is exempt from Pennsylvania Transfer Tax being a conveyance between
siblings and spouses.

SUBJECT, however, to all conditions, easements, restrictions and other matters legally affecting the same or noted on the aforesaid survey.

AND the said grantors will warrant specially the property hereby conveyed.

IN WITNESS WHEREOF, said grantors have executed this deed the day and year first above written.

Sealed and delivered in the presence of

[Signature]

[Signature] (SEAL)
Grant K. Gayman

(as to both)

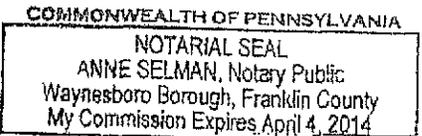
[Signature] (SEAL)
Leah Gayman

COMMONWEALTH OF PENNSYLVANIA :
:SS
COUNTY OF FRANKLIN :

On this, the 23rd day of November, 2011, before me, a notary public, the undersigned officer, personally appeared Grant K. Gayman and Leah Gayman, known to me (or satisfactorily proven) to be the persons whose names are subscribed to the within instrument, and acknowledged that they executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

[Signature]
Notary Public
My Commission expires _____



CERTIFICATE OF RESIDENCE

I hereby certify that the precise residence of the grantee herein is 5460 Stamey Hill Road, Waynesboro, PA 17268.

Witness my hand this 23rd day of November, 2011.

[Signature]
On behalf of Grantees



COUNTY OF FRANKLIN
RECORDER OF DEEDS
Linda Miller, Recorder
Courthouse 157 Lincoln Way East
Chambersburg, PA 17201
Phone: (717) 261-3872

*RETURN DOCUMENT TO:
TIMOTHY W MISNER
39 S BROAD STREET
WAYNESBORO, PA 17268

Instrument Number - 201122821
Recorded On 12/6/2011 At 3:15:26 PM

* Instrument Type - DEED
Invoice Number - 46730 User ID - DSS
* Grantor - GAYMAN, GRANT K
* Grantee - GAYMAN, MARK E

* Total Pages - 3

* FEEES

STATE WRIT TAX	\$0.50
STATE JCS/ACCESS TO JUSTICE	\$23.50
COUNTY RECORDING FEE	\$13.00
AFFORDABLE HOUSING	\$11.05
AFFORDABLE HOUSING	\$1.95
COUNTY IMPROVEMENT FEE	\$2.00
ROD IMPROVEMENT FEE	\$3.00
WAYNESBORO AREA SCHOOL	\$0.00
DIST REAL TAX QUINCY TOWNSHIP	\$0.00
TOTAL PAID	\$55.00

This is a certification page
DO NOT DETACH
This page is now part
of this legal document.

I hereby CERTIFY that this document is recorded in the Recorder of Deeds Office of Franklin County, Pennsylvania.

Linda Miller
Linda Miller
Recorder of Deeds



* - Information denoted by an asterisk may change during the verification process and may not be reflected on this page.

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

1078.00
 GAYMAN MARK E
 GAYMAN SALLY A H&W

19-0102-041.-000000
 Approximate Easement Area = 5.54 Acres



EXHIBIT A
 Owner:
 GAYMAN MARK E
 Franklin PA
 Parcel ID: 1078.00
 Rice to Ringgold



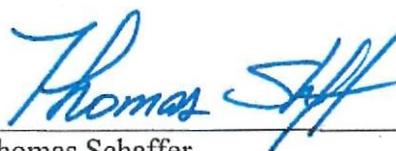
-  Centerline
-  Parcels
-  Parcel Within ROW
-  ROW Approximately 130'

Source: ESRI and Burns & McDonnell Engineering.

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED

MAY 15 AM 11:47
PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Mark Edward Gayman and Grant K. Gayman in Guilford and Quincy Townships, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Anthony D. Kanagy

ADK/sme
Enclosures

Rosemary Chiavetta, Secretary
May 15, 2018
Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

CERTIFICATE OF SERVICE

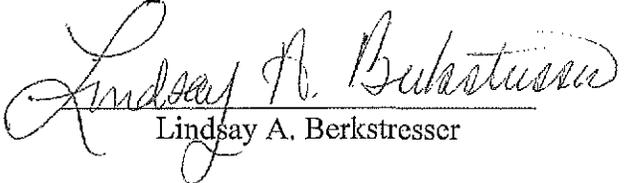
I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mark Edward Gayman
5460 Stamey Hill Road
Waynesboro, PA 17268

Grant K. Gayman
11742 Gehr Road
Waynesboro, PA 17268

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Mark Edward Gayman and Grant K. :
Gayman in Guilford and Quincy Townships, :
Franklin County, Pennsylvania for the Siting :
and Construction of the 230 kV Transmission :
Line Associated with the **Independence** :
Energy Connection-West Project is :
Necessary or Proper for the Service, :
Accommodation, Convenience or Safety of the :
Public :

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Mark Edward Gayman and Grant K. Gayman in Guilford and Quincy Townships, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
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Attention: Antonio Smyth

2. Transource PA's attorneys are:

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17 North Second Street
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Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcial@aep.com

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant to 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the lands owned by Mark Edward Gayman and Grant K. Gayman in Guilford and Quincy Townships, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Mark Edward Gayman and Grant K. Gayman properties for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Mark Edward Gayman and Grant K.

Gayman. The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response,

Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA’s Maryland affiliate, Transource Maryland, LLC (“Transource MD”), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM’s Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at 5034 Altenwald Road, Waynesboro, Franklin County, Pennsylvania 17268 (5034

Altenwald Road Property) and a tract of land located at Stamey Hill Road, Waynesboro, Franklin County, Pennsylvania 17268 (Stamey Hill Road Property).

32. A deed for the properties is recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Instrument Number 201617590 (for both the 5034 Altenwald Road Property and Stamey Hill Road Property) and a copy of said recorded deed is attached hereto as Attachment A.

33. The names and mailing address of the owners of record of said tracts of land are Mark Edward Gayman, 5460 Stamey Hill Road, Waynesboro, Pennsylvania 17268 and Grant K. Gayman, 11742 Gehr Road, Waynesboro, Pennsylvania 17268.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. Maps depicting the proposed right-of-ways across the Mark Edward Gayman and Grant K. Gayman properties are attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Mark Edward Gayman and Grant K. Gayman and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Mark Edward Gayman and Grant K. Gayman and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Mark Edward Gayman and Grant K. Gayman, who is/are the record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filling 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2)

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Respectfully submitted,

Amanda Riggs Conner (District of Columbia ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
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E-mail: hgarcia1@aep.com


David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

UPI: 19-0102-042-000000; 10-0D29-019-000000
Address: 0 Stamey Hill Road, Waynesboro, PA
and 5034 Altenwald Road, Waynesboro, PA
Municipality: Quincy Township; Guilford Township

THIS DEED,

MADE this 6th day of September, 2016,

BETWEEN Mark Edward Gayman, and Grant K. Gayman, as Co-Personal Representatives of the Estate of Ruth K. Gayman, late of Guilford Township, Franklin County, Pennsylvania - - -

----- **GRANTORS**

AND Mark Edward Gayman, of 5460 Stamey Hill Road, Waynesboro, PA and Grant K. Gayman, of 11742 Gehr Road, Waynesboro, PA, each as to an undivided one-half interest as tenants in common ----- **GRANTEES**

WHEREAS, Ruth K. Gayman died February 1, 2016, testate, a domiciliary of Guilford Township, Franklin County, Pennsylvania, seized of the real estate hereinafter described, and

WHEREAS, decedent's last will and testament, dated November 11, 2010, was duly probated by the Register of Wills for Franklin County, Pennsylvania, and is recorded in the Franklin County Register of Wills Office as Item No. 2816-0103, wherein decedent appointed Mark Edward Gayman and Grant K. Gayman as Co-Personal Representatives of decedent's estate, and

WHEREAS, Mark Edward Gayman and Grant K. Gayman duly qualified as Co-Personal Representatives of decedent's estate on February 12, 2016, and

MAXWELL SIPE LAW OFFICES, LLC
237 East Main Street, 2nd Floor
Waynesboro, PA 17268
(717) 655-7096

WHEREAS, all federal and state inheritance and estate taxes have been or will be paid and will not be permitted to become liens upon the real estate herein conveyed; neither shall Grantors permit any lien to exist or remain upon the real estate herein conveyed as a result of the Pennsylvania Department of Welfare Estate Recovery Program, and

WHEREAS, the interest in the real estate herein conveyed was not specifically devised by said will but passes to Grantees as part of the residuary gift under Item III of decedent's will.

NOW, THEREFORE, WITNESSETH, that said Grantors, as Co-Personal Representatives as aforesaid, do hereby grant, convey and distribute in fee simple unto said Grantees:

ALL that real estate lying and being situate in Guilford and Quincy Townships, Franklin County, Pennsylvania, locally known as the "Daugherty Farm", and bounded and described as follows:

BEGINNING at an iron pin at a public road, being U.S. Highway Route No. 399; thence by lands of Ruth K. Gayman heirs, north 71-1/2 degrees west 2169.75 feet (131.5 perches) to an iron pin in said road; thence by lands now or formerly of John Sollenberger, north 34-1/2 degrees east 778.8 feet (47.20 perches) to a stone; thence by same, north 13-1/2 degrees west 1090.65 feet (66.1 perches) to an iron pin at a junction in the road; thence by lands now or formerly of John Sollenberger and Alvey Angle, north 81-1/4 degrees east 1473.12 feet (89.28 perches) to an iron pin; thence by lands now or formerly of Harry Wagaman, south 35 degrees 15 minutes east 1793.22 feet (108.68 perches) to a post; thence by same, south 42 degrees 10 minutes east 747.12 feet (45.28 perches) to a post at corner of lands now or formerly of Mrs. Harp Miller; thence by same, south 61-3/8 degrees west 1320 feet (80 perches) to the place of beginning; **CONTAINING** 117 acres 44.6 square perches as per survey of John H. Atherton, C.S., for Minnie B. Beam heirs and Reuben F. Daugherty, said survey bearing date December 13, 1950.

By deed dated June 11, 2012, Ruth K. Gayman, the decedent herein, conveyed, as Personal Representative of the Estate of Harold Gayman, the above described

real estate, to herself as beneficiary under the will of Harold Gayman. That deed is recorded in the Franklin County Courthouse, Chambersburg, PA, as Instrument No. 201217507.

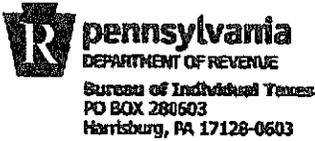
TOGETHER WITH all and singular the rights, liberties, privileges, hereditaments and appurtenances whatsoever thereunto belonging or in any wise appertaining, and the reversions, remainders, rents, issues and profits thereof, and all of the estate, right, title, interest, property claim and demand whatsoever of the said decedent at and immediately before the time of her decease, in law or equity, of, in, to or out of the same.

This is a conveyance of distribution out of an estate and as such is exempt from realty transfer tax.

TO HAVE AND TO HOLD the said granted premises by the said Grantees, their heirs and assigns, forever.

AND the said Mark Edward Gayman and Grant K. Gayman, as Co-Personal Representatives as aforesaid, for themselves, their heirs, executors, and administrators, do covenant, promise and agree to and with the said Grantees, their heirs and assigns, by these presents that they, the said Co-Personal Representatives as aforesaid, have not heretofore done or committed any act, matter or thing whatsoever whereby the premises hereby granted, or any part thereof, is, are, or shall or may be impeached, charged or encumbered in title, charge, estate or otherwise howsoever. Grantees by accepting and recording this deed, waive any claims or any liability that might be made against the Grantors as a result of any environmental actions.

REV-183 EX (2-15)



REALTY TRANSFER TAX STATEMENT OF VALUE

RECORDER'S USE ONLY

State Tax Paid	<u>0</u>
Book Number	<u>201617590</u>
Page Number	
Date Recorded	<u>9/14/16</u>

See reverse for instructions.

Complete each section and file in duplicate with Recorder of Deeds when (1) the full value/consideration is not set forth in the deed, (2) the deed is without consideration or by gift, or (3) a tax exemption is claimed. If more space is needed, please attach additional sheets. A Statement of Value (SOV) is not required if the transfer is wholly exempt from tax based on family relationship or public utility easement. However, it is recommended that a SOV accompany all documents filed for recording.

A. CORRESPONDENT - All inquiries may be directed to the following person:

Name Alexandra M. Sipe, Esq.		Maxwell Sipe Law Offices, LLC		Telephone Number: (717) 655-7096	
Mailing Address 237 East Main Street, 2nd Floor			City Waynesboro		
State PA			ZIP Code 17268		

B. TRANSFER DATA

Date of Acceptance of Document <u> / / </u>					
Grantor(s)/Lessor(s) See Reverse Side		Telephone Number: (717) 264-9453		Grantee(s)/Lessee(s) See Reverse Side	
Mailing Address		Mailing Address			
City	State	ZIP Code	City	State	ZIP Code

C. REAL ESTATE LOCATION

Street Address 0 Stamey Hill Rd. & 5034 Altenwald Rd., Waynesboro, PA			City, Township, Borough Quincy Township and Guilford Township		
County Franklin		School District Waynesboro/Chambersburg		Tax Parcel Number 19-0102-042-000000 and 10-0039-019-000000	

D. VALUATION DATA

Was transaction part of an assignment of realty? <input checked="" type="checkbox"/> Y <input checked="" type="checkbox"/> N					
1. Actual Cash Consideration 0.00		Other Consideration 0.00		3. Total Consideration = 0.00	
4. County Assessed Value 7,750.00 + 28,680.00		5. Common Level Ratio Factor x 7.14		6. Computed Value = 260,110.20	

E. EXEMPTION DATA - Refer to instructions for exemption status.

1a. Amount of Exemption Claimed \$ 260,110.20	1b. Percentage of Grantor's Interest in Real Estate 100.00 %	1c. Percentage of Grantor's Interest Conveyed 100.00 %
---	--	--

2. Check Appropriate Box Below for Exemption Claimed.

- Will or intestate succession. Ruth K. Gayman (Name of Decedent) 2016-0103 (Estate File Number)
- Transfer to a trust. (Attach complete copy of trust agreement identifying all beneficiaries.)
- Transfer from a trust. Date of transfer into the trust _____
If trust was amended attach a copy of original and amended trust.
- Transfer between principal and agent/straw party. (Attach complete copy of agency/straw party agreement.)
- Transfers to the commonwealth, the U.S. and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (If condemnation or in lieu of condemnation, attach copy of resolution.)
- Transfer from mortgagor to a holder of a mortgage in default. (Attach copy of mortgage and note/assignment.)
- Corrective or confirmatory deed. (Attach complete copy of the deed to be corrected or confirmed.)
- Statutory corporate consolidation, merger or division. (Attach copy of articles.)
- Other (Please explain exemption claimed.) _____

Under penalties of law, I declare that I have examined this statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.

Signature of Correspondent or Responsible Party <u><i>Alexandra M. Sipe</i></u>	Date <u>09/12/16</u>
--	-------------------------

FAILURE TO COMPLETE THIS FORM PROPERLY OR ATTACH REQUESTED DOCUMENTATION MAY RESULT IN THE RECORDER'S REFUSAL TO RECORD THE DEED.

GRANTORS:

Mark Edward Gayman and Grant K. Gayman
as Co-Personal Representatives of the
Estate of Ruth K. Gayman, late of Guilford
Township, Franklin County, Pennsylvania

GRANTEES:

Mark Edward Gayman
5460 Stamey Hill Road
Waynesboro, PA 17268

and

Grant K. Gayman
11742 Gehr Road
Waynesboro, PA 17268

each as to an undivided one-half interest
as tenants in common

COPY



COUNTY OF FRANKLIN
RECORDER OF DEEDS
Linda Miller, Recorder
Courthouse 157 Lincoln Way East
Chambersburg, PA 17201
Phone: (717) 261-3872

* RETURN DOCUMENT TO:
MAXWELL SIPE LAW OFFICES

Instrument Number - 201617590
Recorded On 9/14/2016 At 2:42:49 PM

* Instrument Type - DEED
Invoice Number - 143920 User ID - JRH
* Grantor - GAYMAN, RUTH K
* Grantee - GAYMAN, MARK EDWARD

* Total Pages - 7

* FEES

STATE WRIT TAX	\$0.50
STATE JCS/ACCESS TO JUSTICE	\$35.50
COUNTY RECORDING FEE	\$54.00
AFFORDABLE HOUSING	\$11.05
AFFORDABLE HOUSING	\$1.95
COUNTY IMPROVEMENT FEE	\$2.00
ROD IMPROVEMENT FEE	\$3.00
CHAMBERSBURG AREA SCHOOL	\$0.00
DIST REAL TAX	
WAYNESBORO AREA SCHOOL	\$0.00
DIST REAL TAX	
GUILFORD TOWNSHIP	\$0.00
QUINCY TOWNSHIP	\$0.00
TOTAL PAID	\$108.00

This is a certification page

DO NOT DETACH

This page is now part
of this legal document.

Franklin County UPI Verification
UPI Verified On September 14, 2016 By TDS

I hereby CERTIFY that this document is
recorded in the Recorder of Deeds Office
of Franklin County, Pennsylvania.

Linda Miller
Recorder of Deeds



* - Information denoted by an asterisk may change during
the verification process and may not be reflected on this page.

ATTACHMENT B

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED

2018 MAY 15 AM 11:33

PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of GBR Lincoln Highway Limited Liability Company, Chambersburg Holdings, LP and WLR Chambersburg, LLC in Guilford Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/skr
Enclosures

Rosemary Chiavetta, Secretary

May 15, 2018

Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

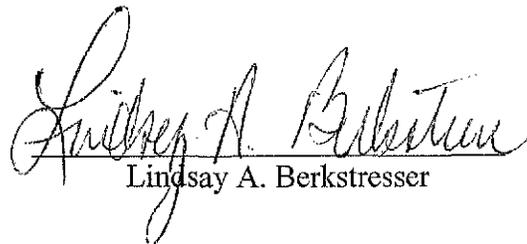
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

GBR Lincoln Highway Limited
Chambersburg Holdings LP
WLR Chambersburg LLC
150 White Plains Road
Tarrytown, NY 10591

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of GBR Lincoln Highway Limited :
Liability Company, Chambersburg Holdings, :
LP and WLR Chambersburg, LLC in Guilford :
Township, Franklin County, Pennsylvania for :
the Siting and Construction of the 230 kV :
Transmission Line Associated with the :
Independence Energy Connection-West :
Project is Necessary or Proper for the Service, :
Accommodation, Convenience or Safety of the :
Public

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of GBR Lincoln Highway Limited Liability Company, Chambersburg Holdings, LP and WLR Chambersburg, LLC in Guilford Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA's attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
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Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by GBR Lincoln Highway Limited Liability Company, Chambersburg Holdings, LP and WLR Chambersburg, LLC in Guilford Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the GBR Lincoln Highway Limited Liability Company, Chambersburg Holdings, LP and WLR Chambersburg, LLC property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on GBR Lincoln Highway Limited

Liability Company, Chambersburg Holdings, LP and WLR Chambersburg, LLC. The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response,

Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA’s Maryland affiliate, Transource Maryland, LLC (“Transource MD”), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM’s Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at Lincoln Way East, Chambersburg, Franklin County, Pennsylvania 17202.

32. Deeds for the property are recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania at Deed Book 3650, Page Number 486 (WLR Chambersburg LLC's interest), Deed Book Vol. 2125, Page 527 (Chambersburg Holdings LP's interest), and Deed Book Vol. 2125, Page 518 (GBR Lincoln Highway Limited Liability Company's interest) and copies of said recorded deeds are attached hereto as Attachment A.

33. The name and mailing address of the owners of record of said tract of land is GBR Lincoln Highway Limited, Chambersburg Holdings, LP and WLR Chambersburg, LLC 150 White Plains Road, Tarrytown, New York 10591.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code ("NESC") clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the GBR Lincoln Highway Limited Liability Company, Chambersburg Holdings, LP and WLR Chambersburg, LLC property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with GBR Lincoln Highway Limited Liability Company, Chambersburg Holdings, LP and WLR Chambersburg, LLC and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that GBR Lincoln Highway Limited Liability Company, Chambersburg Holdings, LP and WLR Chambersburg, LLC and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. **CONSOLIDATION OF RELATED PROCEEDINGS**

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of

this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon GBR Lincoln Highway Limited Liability Company, Chambersburg Holdings, LP and WLR Chambersburg, LLC, who are the record owner of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

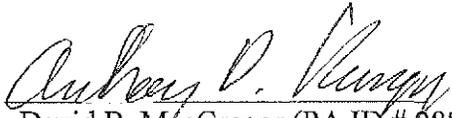
WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Respectfully submitted,

Amanda Riggs Conner (District of Columbia ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
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David B. MacGregor (PA ID # 28804)
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E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

19944906
19949.06

28905

THIS INDENTURE, made the 15th day of June, 2007.

NCS-327815C
Return to:
FIRST AMERICAN TITLE INSURANCE CO.
TWO PENN CENTER PLAZA, SUITE 1910
PHILADELPHIA, PA 19102

Between

WALTER H. RUBIN, as to an undivided three-tenths (3/10ths) interest as tenant in common, having an address of 16395 Mirasol Way, Delray Beach, Florida 33446

(hereinafter called the Grantor), of the one part, and

WLR CHAMBERSBURG, LLC, a limited liability company organized under the laws of the Commonwealth of Pennsylvania having an address of 16395 Mirasol Way, Delray Beach, Florida 33446

(hereinafter called the Grantee), of the other part,

Witnesseth, that the said Grantor for and in consideration of the sum of Ten and 00/100 Dollars (\$10.00) lawful money of the United States of America, unto it well and truly paid by the said Grantee, at or before the sealing and delivery hereof, the receipt whereof is hereby acknowledged, has granted, bargained and sold, released and confirmed, and by these presents does grant, bargain and sell, release and confirm unto the said Grantee:

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATE IN GUILFORD TOWNSHIP, FRANKLIN COUNTY, PENNSYLVANIA MORE FULLY BOUNDED AND DESCRIBED ON EXHIBIT A ANNEXED HERETO AND MADE A PART HEREOF

BEING the same premises which Ruth G. Oyler by Deeds recorded 3/14/1968 in Record Book 623 page 858 and page 862 granted and conveyed a 3/10 interest to Walter H. Rubin and others, as tenants in common.

BEING the same premises which Harold Leslie Buhman et ux by Deed recorded 3/14/1968 in Record Book 623 page 867 granted and conveyed a 3/10 interest to Walter H. Rubin and others, as tenants in common.

The purpose of this deed is to convey the undivided three-tenths (3/10) interest, as tenant-in-common in the conveyed premises, owned by the Grantor to WLR Chambersburg, LLC.

Together with all and singular the buildings and improvements, ways, streets, alleys, driveways, passages, waters, water-courses, rights, liberties, privileges, hereditaments and appurtenances, whatsoever unto the hereby granted premises belonging, or in anywise appertaining, and the reversions and remainders, rents, issues, and profits thereof; and all the estate, right, title, interest, property, claim and demand whatsoever of it, the said grantor, as well at law as in equity, of, in and to the same.

To have and to hold the said lot or piece of ground described above, with the buildings and improvements thereon erected, hereditaments and premises hereby granted, or mentioned and intended so to be, with the appurtenances, unto the said Grantee, its successors and assigns, to and for the only proper use and behoof of the said Grantee, its successors and assigns, forever.

And the said Grantor, for itself and its successors, does, by these presents, covenant, grant and agree, to and with the said Grantee, its successors and assigns, that it, the said Grantor, and its successors and assigns, all and singular the hereditaments and premises herein described and granted, or mentioned and intended so to be, with the appurtenances, unto the said Grantee, its successors and assigns, against it, the said Grantor, and its successors and assigns, and against all and every other person and persons whosoever lawfully claiming or to claim the same or any part thereof, by, from or under him, her, it, or any of them, shall and will

Warrant and Forever Defend.

[SIGNATURE IS ON A SEPARATE PAGE WHICH FOLLOWS HEREWITH]

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In Witness Whereof, the party of the first part hereunto set their hand and seal on the day and year first above written.

Walter H. Rubin {SEAL}
WALTER H. RUBIN

STATE OF FLORIDA :
COUNTY OF Palm Beach : ss

AND NOW, this 15th day of June 2007 before me, the undersigned Notary Public, appeared Walter H. Rubin, who acknowledged himself to be the person who executed the foregoing instrument for the purposes therein contained and that by signing his name on the instrument, acknowledged the foregoing instrument to be his act and deed.

IN WITNESS WHEREOF, I hereunder set my hand and official seal.

Marcelle Bader
Notary Public:
My commission expires:

COPY



The address of the above-named Grantee is:
16395 Mirasol Way, Delray Beach, Florida 33446

Walter H. Rubin
On behalf of the Grantee

File No.

Record and return to:

Robert A. Korren, PLLC
1 Barker Avenue, Suite 485
White Plains, NY 10601

6-27
RECORDED
2007 DEC 26 A 10:34
LINDA MILLER
RECORDER OF DEEDS
FRANKLIN COUNTY

EXHIBIT A (1 of 2)

All that certain piece or parcel of land, together with the buildings and improvements thereon, situated in the Township of Guilford, County of Franklin and State of Pennsylvania, bounded and described as follows:

BEGINNING at a point which lies the following three courses and distances from the intersection of the centerlines of Township Route 518 and U.S. Route 30 (Lincoln Highway):

1. S 79° 17' E, a distance of 640.75 feet along the centerline of U.S. Route 30 to a point; thence
2. At right angles to said centerline, a distance of 35 feet to a point in the northerly right of way line of said U.S. Route 30; thence
3. N 14° 13' E a distance of 1001.87 feet to the point or place of **BEGINNING**; thence:

From said point of **BEGINNING**,

N 14° 13' E a distance of 2205.30 feet to a point; thence

N 84° 40' E a distance of 1700.7 feet to a point; thence

S 15° 03' W a distance of 803.5 feet to a point; thence

S 16° 41' W a distance of 1857.61 feet to a point; thence

N 78° 06' W a distance of 458.15 feet to a point; thence

S 13° 39' W a distance of 32.62 feet to a point; thence

N 79° 17' W a distance of 1055.44 feet to the point or place of **BEGINNING**.

Containing 87.204 acres in accordance with survey dated November 16-17, 1967, last revised February 20, 1968, prepared by John Howard McClellan, licensed Land Surveyor, Commonwealth of Pennsylvania; and

ALL that certain piece or parcel of land, together with the buildings and improvements thereon, situated in the Township of Guilford, County of Franklin and State of Pennsylvania, bounded and described as follows:

BEGINNING at a point which lies the following two (2) courses and distances from the intersection of the centerlines of Township Route 518 and U.S. Route 30 (Lincoln Highway):

EXHIBIT A (272)

1. S 79° 17' E, a distance of 640.75 feet along the centerline of U.S. Route 30 to a point; thence

2. At right angles to said centerline, a distance of 35 feet to a point in the northerly right of way line of said U.S. Route 30, to the place or point of BEGINNING; thence

From said point of BEGINNING,

N 14° 13' E 1001.87 feet to a point; thence

S 79° 17' E, a distance of 1055.44 feet to a point; thence

S 13° 39' W, a distance of 1001.31 feet to a point in the northerly right of way of said U.S. Route 30; thence

N 79° 17' W along the northerly right of way line of said U.S. Route 30, a distance of 459.18 feet to a point; thence

N 12° 08' E, a distance of 183.45 feet to a point; thence

N 77° 52' W a distance of 87.80 feet to a point; thence

S 21° 58' W, a distance of 189.20 feet to a point in the northerly right of way line of said U.S. Route 30; thence

N 79° 17' W along said right of way line of U.S. Route 30, a distance of 485.89 feet, to the point or place of BEGINNING.

Containing 23.902 acres in accordance with survey dated November 16-17, 1987, last revised February 20, 1988, prepared by John Howard McClellan, licensed Land Surveyor, Commonwealth of Pennsylvania; and

ALL that certain piece or parcel of land, together with the buildings and improvements thereon, situated in the Township of Guilford, County of Franklin and State of Pennsylvania, bounded and described as follows:

BEGINNING at a point which lies the following three (3) courses and distances from the intersection of the centerlines of Township Route 518 and U.S. Route 30 (Lincoln Highway):

1. S 79° 17' E, a distance of 640.75 feet along the centerline of U.S. Route 30 to a point; thence

2. At right angles to said centerline, a distance of 35 feet to a point in the northerly right of way line of said U.S. Route 30; thence

3. S 79° 17' E, along the northerly right of way line of U.S. Route 30, a distance of 485.98 feet to the point or place of BEGINNING; thence:

From said point of BEGINNING,

N 21° 58' E 189.20 feet to a point; thence

S 77° 52' E, a distance of 87.8 feet to a point; thence

S 12° 08' W, a distance of 183.45 feet to a point in the northerly right of way line of said U.S. Route 30; thence

N 79° 17' W along the northerly right of way line of said U.S. Route 30, a distance of 120.18 feet to the point or place of BEGINNING.

Containing 0.441 acres in accordance with survey dated November 16-17, 1987, last revised February 20, 1988, prepared by John Howard McClellan, licensed Land Surveyor, Commonwealth of Pennsylvania.

TP# 10-D-5-4
10-D-5-4A
10-D-5-4AB

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Franklin County Register And Recorder

Linda Miller

Courthouse 157 Lincoln Way East

Chambersburg, PA 17201

Phone: (717) 261-3872

2007-028905

Instrument Number: 2007-028905

Instrument Type: DEED

Receipt Date: 12/26/2007

Receipt Time: 10:31:32

Receipt No.: 277125

Receipt Distribution

Fee/Tax Description Payment Amount

DEED	14.00
DEED - WRIT	.50
DEED - RTT STATE	19,949.06
CHAMBERSBURG	9,974.53
GUILFORD TOWNSHIP	9,974.53
DEED AFFORDABLE HS	11.05
DEED A/H ADMIN FEE	1.95
J.C.S. / A.T.J	10.00
CO IMPROVEMENT FND	2.00
REC. IMPRVMT FUND	3.00

Paid By Remarks: RUBIN-WLR CHAMBERSBURG LLC DSS
FIRST AMERICAN TITLE INS

Check# 9739/6188 \$39,940.62

Total Received..... \$39,940.62

COPY

I hereby CERTIFY that this document is recorded in the Recorder's Office of Franklin County, Pennsylvania



Linda Miller

Linda Miller
Recorder of Deeds

Certification Page

DO NOT DETACH

This page is now part of this legal document.

NOTE: Some information subject to change during the verification process and may not be reflected on this page.

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REALTY TRANSFER TAX STATEMENT OF VALUE

See Reverse for Instructions

RECORDER'S USE ONLY	
State Tax Paid	19949.06
Book Number	3650
Page Number	486
Date Recorded	12/26/07

Complete each section and file in duplicate with Recorder of Deeds when (1) the full value/consideration is not set forth in the deed, (2) when the deed is without consideration, or by gift, or (3) a tax exemption is claimed. A Statement of Value is not required if the transfer is wholly exempt from tax based on: (1) family relationship or (2) public utility easement. If more space is needed, attach additional sheet(s).

A CORRESPONDENT - All Inquiries may be directed to the following person:

Name ROBERT A. KORREN, ESQ.		Telephone Number: Area Code (914) 948-1188	
Street Address 1 Barker Avenue, Suite 488	City White Plains	State NY	Zip Code 10801

B TRANSFER DATA

Grantor(s)/Lessor(s) WALTER H. RUBIN		Date of Acceptance of Document	
Grantee(s)/Lessee(s) WLR CHAMBERSBURG, LLC			
Street Address 16395 Mirasol Way		Street Address 16395 Mirasol Way	
City Delray Beach	State FL	Zip Code 33448	City Delray Beach
			State FL
			Zip Code 33448

C PROPERTY LOCATION

Street Address Route 30		City, Township, Borough Gulford	
County Franklin	School District CHAMBERSBURG	Tax Parcel Number 10-D-5-4 / 10-D-5-4A / 10-D-5-4B	

D VALUATION DATA

1. Actual Cash Consideration \$0	2. Other Consideration +\$0	3. Total Consideration = \$0
4. County Assessed Value \$851,930	5. Common Law Ratio Factor x 10.20	6. Fair Market Value = \$6,649,886

E EXEMPTION DATA

1a. Amount of Exemption Claimed None	1b. Percentage of Interest Conveyed 30%	SEE ATTACHED CALCULATION
--	---	---------------------------------

2. Check Appropriate Box Below for Exemption Claimed

Will or Intestate succession _____ (Name of Decedent) _____ (Estate File Number)

Transfer to Industrial Development Agency.

Transfer to a trust. (Attach complete copy of trust agreement identifying all beneficiaries.)

Transfer between principal and agent. (Attach complete copy of agency/straw party agreement)

Transfers to the Commonwealth, the United States and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (If condemnation or in lieu of condemnation, attach copy of resolution.)

Transfer from mortgagor to a holder of a mortgage in default. Mortgage Book Number _____, Page Number _____

Corrective or confirmatory deed. (Attach complete copy of the prior deed being corrected or confirmed.)

Statutory corporate consolidation, merger or division. (Attach copy of articles.)

Other (Please explain exemption claimed, if other than listed above.) **DEED NOT DELIVERED UNTIL 12/26/07**

Under penalties of law, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.

Signature of Correspondent or Responsible Party [Signature]	Date 12/26/07
---	-------------------------

REALTY TRANSFER TAX:

Formula:

Assessment X Common Level Ratio = Computed Value X 2% X .30

WLR Chambersburg, LLC – Franklin County

$\$651,930 \times 10.20 = \$6,649,686.00 \times 0.02 = \$132,993.72 \times .30 = \$39,898.12$

COPY

Vol 3650 Pg 491

THIS INDENTURE made the 19th day of March, in the year of our Lord, Two Thousand and Three (2003)

86819

BETWEEN LOOMIS J. GROSSMAN, JR. AND RICHARD A. GROSSMAN (SUCCESSOR TRUSTEE TO ROBERT C. BAKER) AS TRUSTEES UNDER INDENTURE OF TRUST DATED JUNE 19, 1967 FOR THE BENEFIT OF RACHEL GROSSMAN, as to an undivided eleven and two-thirds percent (11 2/3%) interest; **LOOMIS J. GROSSMAN, JR. AND RICHARD A. GROSSMAN (SUCCESSOR TRUSTEE TO ROBERT C. BAKER) AS TRUSTEES UNDER INDENTURE OF TRUST DATED JUNE 19, 1967 FOR THE BENEFIT OF JOSHUA J. GROSSMAN**, as to an undivided eleven and two-thirds percent (11 2/3%) interest; and **RICHARD A. GROSSMAN**, as to an undivided twenty-three and one-third percent (23 1/3%) interest, all as Tenants-in-Common, having an address of 150 White Plains Road, Tarrytown, New York 10591, (hereinafter called the **Grantor**), of the first part, and

GBR LINCOLN HIGHWAY LIMITED LIABILITY COMPANY, a Delaware limited liability company, having a mailing address c/o Gibraltar Management Co., Inc., 150 White Plains Road, Tarrytown, New York 10591, (hereinafter called the **Grantee**), of the other part,

WITNESSETH, That the said Grantor, for and in consideration of the sum of ONE AND 00/100 (\$1.00) DOLLAR lawful money of the United States of America, unto them well and truly paid by the said Grantee, at or before the sealing and delivery hereof, the receipt whereof is hereby acknowledged, granted, bargained and sold, released and confirmed, and by these presents does grant, bargain and sell, release and confirm unto the said Grantee, its successors and assigns, collectively, an undivided forty-six and two-thirds percent (46 2/3%) interest as Tenant-in-Common in and to:

All that certain piece or parcel of land, together with the buildings and improvements thereon, situated in the Township of Guilford, County of Franklin and State of Pennsylvania, bounded and described as follows:

BEGINNING at a point which lies the following three courses and distances from the intersection of the centerlines of Township Route 518 and U.S. Route 30 (Lincoln Highway):

1. S 79° 17' E, a distance of 640.75 feet along the centerline of U.S. Route 30 to a point; thence
2. At right angles to said centerline, a distance of 35 feet to a point in the northerly right of way line of said U.S. Route 30; thence
3. N 14° 13' E a distance of 1001.87 feet to the point or place of BEGINNING: thence:

From said point of BEGINNING,

N 14° 13' E a distance of 2205.30 feet to a point; thence

N 84° 40' E a distance of 1700.7 feet to a point; thence

S 15° 03' W a distance of 803.5 feet to a point; thence

S 16° 41' W a distance of 1857.61 feet to a point; thence

N 78° 06' W a distance of 458.15 feet to a point; thence

S 13° 39' W a distance of 32.62 feet to a point; thence

N 79° 17' W a distance of 1055.44 feet to the point or place of BEGINNING.

Containing 87.204 acres in accordance with survey dated November 16-17, 1967, last revised February 20, 1968, prepared by John Howard McClellan, licensed Land Surveyor, Commonwealth of Pennsylvania; and

ALL that certain piece or parcel of land, together with the buildings and improvements thereon, situated in the Township of Guilford, County of Franklin and State of Pennsylvania, bounded and described as follows:

BEGINNING at a point which lies the following two (2) courses and distances from the intersection of the centerlines of Township Route 518 and U.S. Route 30 (Lincoln Highway):

1. S 79° 17' E, a distance of 640.75 feet along the centerline of U.S. Route 30 to a point; thence

2. At right angles to said centerline, a distance of 35 feet to a point in the northerly right of way line of said U.S. Route 30, to the place or point of BEGINNING; thence

From said point of BEGINNING,

N 14° 13' E 1001.87 feet to a point; thence

S 79° 17' E, a distance of 1055.44 feet to a point; thence

S 13° 39' W, a distance of 1001.31 feet to a point in the northerly right of way of said U.S. Route 30; thence

N 79° 17' W along the northerly right of way line of said U.S. Route 30, a distance of 459.19 feet to a point; thence

N 12° 08' E, a distance of 183.45 feet to a point; thence

N 77° 52' W a distance of 87.80 feet to a point; thence

S 21° 58' W, a distance of 189.20 feet to a point in the northerly right of way line of said U.S. Route 30; thence

N 79° 17' W along said right of way line of U.S. Route 30, a distance of 485.99 feet, to the point or place of BEGINNING.

Containing 23.902 acres in accordance with survey dated November 16-17,

1967, last revised February 20, 1968, prepared by John Howard McClellan, licensed Land Surveyor, Commonwealth of Pennsylvania; and

ALL that certain piece or parcel of land, together with the buildings and improvements thereon, situated in the Township of Guilford, County of Franklin and State of Pennsylvania, bounded and described as follows:

BEGINNING at a point which lies the following three (3) courses and distances from the intersection of the centerlines of Township Route 518 and U.S. Route 30 (Lincoln Highway):

1. S 79° 17' E, a distance of 640.75 feet along the centerline of U.S. Route 30 to a point; thence

2. At right angles to said centerline, a distance of 35 feet to a point in the northerly right of way line of said U.S. Route 30; thence

3. S 79° 17' E, along the northerly right of way line of U.S. Route 30, a distance of 485.99 feet to the point or place of BEGINNING: thence:

From said point of BEGINNING.

N 21° 58' E 189.20 feet to a point; thence

S 77° 52' E, a distance of 87.8 feet to a point; thence

S 12° 08' W, a distance of 183.45 feet to a point in the northerly right of way line of said U.S. Route 30; thence

N 79° 17' W along the northerly right of way line of said U.S. Route 30, a distance of 120.18 feet to the point or place of BEGINNING.

Containing 0.441 acres in accordance with survey dated November 16-17, 1967, last revised February 20, 1968, prepared by John Howard McClellan, licensed Land Surveyor, Commonwealth of Pennsylvania.

BEING AND INTENDED TO BE the same premises described in the following four Deeds:

a) Deed dated March 13, 1968 by RUTH G. OYLER to ROBERT C. BAKER, TRUSTEE, ET AL. recorded on March 14, 1968 in the Office of the Recorder of Franklin County, Pennsylvania in Deed Book 623 at Page 858; and

b) Deed dated March 13, 1968 by RUTH G. OYLER to ROBERT C. BAKER, TRUSTEE, ET AL. recorded in the Office of the Recorder of Franklin County, Pennsylvania on March 14, 1968 in Deed Book 623 at Page 862; and

c) Deed dated March 14, 1968 by HAROLD LESLIE BUHRMAN and SARAH MAUST BUHRMAN, his wife to ROBERT C. BAKER, TRUSTEE, ET AL., recorded in the Office of the Recorder of Franklin County, Pennsylvania on March 14, 1968 in Deed Book 623 at Page 867; and

d) Deed dated December 20, 1973 by DENNIS HANDLER, a/k/a DAN HANDLER, and JUDITH HANDLER, his wife, to ROBERT C BAKER, TRUSTEE, ET AL., recorded in the Office of the Recorder of Franklin County, Pennsylvania on December 31, 1973 in Deed Book 695 at Page 637.

TOGETHER WITH all right, title and interest of parties of the first part, in, to and under all those certain leases, tenancies and occupancies affecting the aforementioned premises; and

TOGETHER WITH all right, title and interest of parties of the first part in and to any and all deposits by tenants, lessees or occupants of the aforementioned premises; and

TOGETHER WITH any and all amounts heretofore paid or to be paid or repaid by tenants, lessees or occupants of the aforementioned premises, for fixtures, equipment or similar allowances; and

TOGETHER WITH all right, title and interest in and to all fixtures and articles of personal property attached, appurtenant to, or used in connection with the aforementioned premises; and

TOGETHER WITH all right, title and interest in, to and under that certain Easement for Drainage and that certain Easement for Utilities more particularly described and set forth in that certain Warranty Deed by RUTH G. OYLER to ROBERT C. BAKER, TRUSTEE, ET AL, dated March 13, 1968, recorded in the Office of the Recorder of Franklin County, Pennsylvania in Deed Book 623 at Page 858; and

TOGETHER WITH all right, title and interest in, to and under that certain Easement for Drainage and that certain Easement for Utilities more particularly described and set forth in that certain Warranty Deed by HAROLD LESLIE BUHRMAN and SARAH MAUST BUHRMAN to ROBERT C. BAKER, TRUSTEE, ET AL dated March 14, 1968, recorded in the Office of the Recorder of Franklin County, Pennsylvania in Deed Book 623 at Page 867.

TOGETHER with all and singular the improvements, ways, streets, alleys, driveways, passages, waters, water-courses, rights, liberties, privileges, hereditaments and appurtenances, whatsoever unto the hereby granted premises belonging, or in any wise appertaining, and the reversions and remainders, rents, issues, and profits thereof; and all the estate, right, title, interest, property, claim and demand whatsoever of the said Grantor, as well at law as in equity, of, in, and to the same.

Subject to easements, reservations, restrictions and covenants, if any, of record and to any state of facts an accurate survey and inspection of said premises would disclose and to the rights of tenants in possession.

TO HAVE AND TO HOLD the said lot or piece of ground described with the buildings and improvements thereon erected, hereditaments and premises hereby granted, or mentioned and intended so to be, with the appurtenances, unto the said Grantee, its successors and assigns, to and for the only proper use and behoof of the said Grantee, its successors and assigns forever.

The purpose of this deed is to convey the undivided forty-six and two-thirds percent (46 2/3%) interest, as tenants-in-common in the conveyed premises, collectively owned by the party of the first part, to GBR Lincoln Highway Limited Liability Company.

AND the said Grantor, their heirs, executors and administrators do covenant, promise and agree, to and with the said Grantee, its successors and assigns, by these presents, that the said Grantor and its their heirs all and singular the hereditaments and premises hereby granted or mentioned and intended so to be, with the appurtenances, unto the said Grantee, its successors and assigns, against the said Grantor and their heirs, and against all and every person and persons whomsoever lawfully claiming or to claim the same or any part thereof, by, from or under them or any of them, shall and will WARRANT and forever DEFEND.

In Witness Whereof, the party of the first part hereunto set their hands and seals .

Dated the day and year first above written.

Sealed and Delivered
In the Presence of Us:

ATTEST:





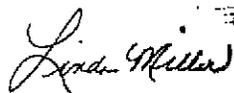
LOOMIS J. GROSSMAN, JR., AS
TRUSTEE UNDER INDENTURE OF
TRUST DATED JUNE 19, 1967 FOR THE
BENEFIT OF RACHEL GROSSMAN



RICHARD A. GROSSMAN, AS TRUSTEE
UNDER INDENTURE OF TRUST DATED
JUNE 19, 1967 FOR THE BENEFIT OF
RACHEL GROSSMAN

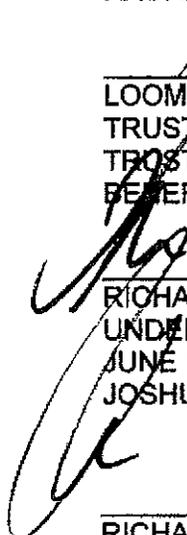
I hereby CERTIFY that this document is
recorded in the Recorder's Office of
Franklin County, Pennsylvania




Linda Miller
Recorder of Deeds



LOOMIS J. GROSSMAN, JR., AS
TRUSTEE UNDER INDENTURE OF
TRUST DATED JUNE 19, 1967 FOR THE
BENEFIT OF JOSHUA J. GROSSMAN



RICHARD A. GROSSMAN, AS TRUSTEE
UNDER INDENTURE OF TRUST DATED
JUNE 19, 1967 FOR THE BENEFIT OF
JOSHUA J. GROSSMAN

RICHARD A. GROSSMAN

State of New York)
) ss.:
County of Westchester)

On this, the 19th day of March, 2003, before me, a Notary Public for the State of New York, personally appeared LOOMIS J. GROSSMAN, JR. and RICHARD A. GROSSMAN, known to me satisfactorily proven to be the persons whose names are subscribed to the within instrument, and acknowledged that they executed the same for the purposes therein contained.

I hereunto set my hand and official seal.

Jeannette Kadin
Notary Public

JEANNETTE KADIN
Notary Public, State of New York
No. 4815523
Qualified in Rockland County
Commission Expires April 30, 2006

RECORDED

03 MY -2 P 2:01.6

LINDA MILLER
RECORDER OF DEEDS
FRANKLIN COUNTY

es

COPY

Franklin County - Recorder of Deeds
LINDA MILLER
Instrument Filings

Receipt# 113802

Instr# 2003-086819 5/02/2003 14:04:40

Remarks: GROSSMAN LOOMIS/GER LINCOLN
DONNA/FRANKLIN JR

DEED	23.50
DEED - WRIT	.50
DEED - RTT STATE	16750.32
CHAMBERSBURG	8375.16
GUILFORD TOWNSHIP	8375.16
DEED AFFORDABLE HS	11.05
DEED A/H ADMIN FEE	1.95
J.C.S. / A.T.J	10.00
CD IMPROVEMENT FND	2.00
REC. IMPRVMT FUND	3.00
Check# 6803	\$8,427.16
Check# 6684	\$16,750.32
Check# 6804	\$8,375.16
Total Received.....	\$33,552.64

DEED

LOOMIS J. GROSSMAN, JR. AND RICHARD A. GROSSMAN (SUCCESSOR TRUSTEE TO ROBERT C. BAKER) AS TRUSTEES UNDER INDENTURE OF TRUST DATED JUNE 19, 1967 FOR THE BENEFIT OF RACHEL GROSSMAN; LOOMIS J. GROSSMAN, JR. AND RICHARD A. GROSSMAN (SUCCESSOR TRUSTEE TO ROBERT C. BAKER) AS TRUSTEES UNDER INDENTURE OF TRUST DATED JUNE 19, 1967 FOR THE BENEFIT OF JOSHUA J. GROSSMAN; AND RICHARD A. GROSSMAN, all as Tenants-in-Common

-TO-

GBR LINCOLN HIGHWAY LIMITED LIABILITY COMPANY,
a Delaware limited liability company

Premises: US ROUTE 30 - LINCOLN WAY EAST
CHAMBERSBURG, PENNSYLVANIA

The address of the above-named Grantee
is: c/o Gibraltar Management Co., Inc.
150 White Plains Road
Tarrytown, New York 10591

On behalf of the Grantee



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF REVENUE BUREAU OF INDIVIDUAL TAXES POST OFFICE BOX 8910 HARRISBURG, PA 17105-8910	REALTY TRANSFER TAX STATEMENT OF VALUE See Attached for Instructions	RECORDER'S USE ONLY	
		State Tax Paid	16750.32
		Book Number	2125
		Page Number	518
		Date Recorded	5-2-03

Complete each section and file in duplicate with Recorder of Deeds when (1) the full consideration is not set forth in the deed, (2) when the deed is without consideration, or by gift, or (3) a tax exemption is claimed. A Statement of Value is not required if the transfer is wholly exempt from tax based on: (1) family relationship or (2) public utility easement. If more space is needed, attach additional sheet(s)

A. CORRESPONDENT - All inquiries may be directed to the following person:

Name RONALD S. FRIEDMAN	Telephone Number: Area Code (914) 631-6200
Street Address 150 White Plains Road,	City Tarrytown,
	State New York
	Zip Code 10591

B. TRANSFER DATA

Grantor(s) Lessor(s) See Attached Sheet	Date of Acceptance of Document
Street Address 150 White Plains Road	Grantee(s) Lessee(s) GBR Lincoln Highway Limited Liability Company
City Tarrytown,	Street Address c/o Gibraltar Management Co., Inc.
State New York	150 White Plains Road
Zip Code 10591	City Tarrytown,
	State New York
	Zip Code 10591

C. PROPERTY LOCATION

Street Address Lincoln Way East - U.S. Route 30	City, Township, Borough Guilford
County Franklin	School District Chambersburg Area
	Tax Parcel Number 09-022-003-000000, 10-005-004-000000 and 10-005-004-000000

D. VALUATION DATA

1. Actual Cash Consideration 00.	2. Other Consideration +	3. Total Consideration - 00.
4. County Assessed Value Total 606,310.	5. Common Level Ratio Factor X 5.92	6. Fair Market Value - 3,589,355.

E. EXEMPTION DATA

1a. Amount of Exemption Claimed	1b. Percentage of Interest Conveyed 46 2/3%
---------------------------------	---

2. Check Appropriate Box Below for Exemption Claimed
- Will or intestate succession _____
(Name of Decedent) (Estate File Number)
 - Transfer to Industrial Development Agency
 - Transfer to agent or straw party. (Attach copy of agency/straw party agreement)
 - Transfer between principal and agent. (Attach copy of agency/straw trust agreement). Tax paid prior deed \$ _____
 - Transfers to the Commonwealth, the United States, and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (Attach copy of resolution)
 - Transfer from mortgagor to a holder of a mortgage in default. Mortgage Book Number _____, Page Number _____.
 - Corrective deed (attach copy of the prior deed).
 - Statutory Corporate Consolidation, Merger or Division. (Attach copy of articles).
 - Other (Please explain exemption claimed, if other than listed above.) _____

Under penalties of law, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.

Signature of Correspondent or Responsible Party BY: Loomis J. Grossman, Jr., as Manager	Date 3/19/03
---	------------------------

B. TRANSFER DATA

LOOMIS J. GROSSMAN, JR. AND RICHARD A. GROSSMAN (SUCCESSOR TRUSTEE TO ROBERT C. BAKER) AS TRUSTEES UNDER INDENTURE OF TRUST DATED JUNE 19, 1967 FOR THE BENEFIT OF RACHEL GROSSMAN, as to an undivided eleven and two-thirds percent (11 2/3%) interest; **LOOMIS J. GROSSMAN, JR. AND RICHARD A. GROSSMAN (SUCCESSOR TRUSTEE TO ROBERT C. BAKER) AS TRUSTEES UNDER INDENTURE OF TRUST DATED JUNE 19, 1967 FOR THE BENEFIT OF JOSHUA J. GROSSMAN**, as to an undivided eleven and two-thirds percent (11 2/3%) interest; and **RICHARD A. GROSSMAN**, as to an undivided twenty-three and one-third percent (23 1/3%) interest, all as Tenants-in-Common, having an address of 150 White Plains Road, Tarrytown, New York 10591, (hereinafter called the **Grantor**), of the first part,

COPY

THIS INDENTURE made as of the 19th day of *March*, in the year of our Lord, Two Thousand and *Three*.

BETWEEN RICHARD A. BAKER, as to an undivided seven and seven-ninths percent (7 7/9%) interest; LAUREN S. RICHMAN (a/k/a Lauren S. Baker), as to an undivided seven and seven-ninths percent (7 7/9%) interest; and ROBERT C. BAKER, TRUSTEE, and GERALD H. BAKER, TRUSTEE UNDER INDENTURE OF TRUST DATED JUNE 19, 1967 FOR THE BENEFIT OF NELSON J. BAKER, as to an undivided seven and seven-ninths percent (7 7/9%) interest, all as Tenants-in-Common, having an address of 3 Manhattanville Road, Purchase, New York 10577 (hereinafter called the "Grantor"), of the first part, and

CHAMBERSBURG HOLDINGS L.P., a Delaware limited partnership, having a mailing address c/o National Realty & Development Corp., 3 Manhattanville Road, Purchase, New York 10577 (hereinafter called the "Grantee"), of the other part,

WITNESSETH, that the said Grantor, for and in consideration of the sum of ONE AND 00/100 (\$1.00) DOLLAR lawful money of the United States of America, unto them well and truly paid by the said Grantee, at or before the sealing and delivery hereof, the receipt whereof is hereby acknowledged, granted, bargained and sold, released and confirmed, and by these presents does grant, bargain and sell, release and confirm unto the said Grantee, its successors and assigns, collectively, an undivided twenty-three and one-third percent (23 1/3%) interest as Tenant-in-Common in and to:

All that certain piece or parcel of land, together with the buildings and improvements thereon, situated in the Township of Guilford, County of Franklin and Commonwealth of Pennsylvania, bounded and described as follows:

BEGINNING at a point which lies the following three courses and distances from the intersection of the centerlines of Township Route 518 and U.S. Route 30 (Lincoln Highway):

1. S 79° 17' E, a distance of 640.75 feet along the centerline of U.S. Route 30 to a point; thence
2. At right angles to said centerline, a distance of 35 feet to a point in the northerly right of way line of said U.S. Route 30; thence
3. N 14° 13' E a distance of 1001.87 feet to the point or place of BEGINNING; thence

From said point of BEGINNING,

N 14° 13' E a distance of 2205.30 feet to a point; thence

N 84° 40' E a distance of 1700.7 feet to a point; thence

S 15° 03' W a distance of 803.5 feet to a point; thence

I hereby CERTIFY that this document is recorded in the Recorder's Office of Franklin County, Pennsylvania



Linda Miller

Linda Miller
Recorder of Deeds

S 16° 41' W a distance of 1857.61 feet to a point; thence

N 78° 06' W a distance of 458.15 feet to a point; thence

S 13° 39' W a distance of 32.62 feet to a point; thence

N 79° 17' W a distance of 1055.44 feet to the point or place of BEGINNING.

Containing 87.204 acres in accordance with survey dated November 16-17, 1967, last revised February 20, 1968, prepared by John Howard McClellan, licensed Land Surveyor, Commonwealth of Pennsylvania; and

ALL the certain piece or parcel of land, together with the buildings and improvements thereon, situated in the Township of Guilford, County of Franklin and Commonwealth of Pennsylvania, bounded and described as follows:

BEGINNING at a point which lies the following two (2) courses and distances from the intersection of the centerlines of Township Route 518 and U.S. Route 30 (Lincoln Highway):

1. S 79° 17' E, a distance of 640.75 feet along the centerline of U.S. Route 30 to a point; thence
2. At right angles to said centerline, a distance of 35 feet to a point in the northerly right of way line of said U.S. Route 30, to the place or point of BEGINNING; thence

From said point of BEGINNING;

N 14° 13' E 1001.87 feet to a point; thence

S 79° 17' E, a distance of 1055.44 feet to a point; thence

S 13° 39' W, a distance of 1001.31 feet to a point in the northerly right of way of said U.S. Route 30; thence

N 79° 17' W along the northerly right of way line of said U.S. Route 30, a distance of 459.19 feet to a point; thence

N 12° 08' E, a distance of 183.45 feet to a point; thence

N 77° 52' W a distance of 87.80 feet to a point; thence

S 21° 58' W, a distance of 189.20 feet to a point in the northerly right of way line of said U.S. Route 30; thence



N 79° 17' W along said right of way line of U.S. Route 30, a distance of 485.99 feet, to the point or place of BEGINNING.

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BEGINNING at a point which lies the following three (3) courses and distances from the intersection of the centerlines of Township Route 518 and U.S. Route 30 (Lincoln Highway):

1. S 79° 17' E, a distance of 640.75 feet along the centerline of U.S. Route 30 to a point; thence
2. At right angles to said centerline, a distance of 35 feet to a point in the northerly right of way line of said U.S. Route 30; thence
3. S 79° 17' E, along the northerly right of way line of U.S. Route 30, a distance of 485.99 feet to the point or place of BEGINNING: thence

From said point of BEGINNING.

N 21° 58' E 189.20 feet to a point; thence

S 77° 52' E, a distance of 87.8 feet to a point; thence

S 12° 08' W, a distance of 183.45 feet to a point in the northerly right of way line of said U.S. Route 30; thence

N 79° 17' W along the northerly right of way line of said U.S. Route 30, a distance of 120.18 feet to the point or place of BEGINNING.

Containing 0.441 acres in accordance with survey dated November 16-17, 1967, last revised February 20, 1968, prepared by John Howard McClellan, licensed Land Surveyor, Commonwealth of Pennsylvania.

BEING AND INTENDED TO BE the same premises described in the following Deeds:

- a) Deed dated March 13, 1968 by RUTH G. OYLER to ROBERT C. BAKER, TRUSTEE, ET AL., recorded on March 14, 1968 in the Office of the Recorder of Franklin County, Pennsylvania in Deed Book 623 at Page 858; and

- b) Deed dated March 13, 1968 by RUTH G. OYLER to ROBERT C. BAKER, TRUSTEE, ET AL., recorded in the Office of the Recorder of Franklin County, Pennsylvania on March 14, 1968 in Deed Book 623 at Page 862; and
- c) Deed dated March 14, 1968 by HOWARD LESLIE BUHRMAN and SARAH MAUST BUHRMAN, his wife, to ROBERT C. BAKER, TRUSTEE, ET AL., recorded in the Office of the Recorder of Franklin County, Pennsylvania on March 14, 1968 in Deed Book 623 at Page 867; and
- d) Deed dated December 20, 1973 by DENNIS HANDLER, a/k/a DAN HANDLER, and JUDITH HANDLER, his wife, to ROBERT C. BAKER, TRUSTEE, ET AL., recorded in the Office of the Recorder of Franklin County, Pennsylvania on December 31, 1973 in Deed Book 695 at Page 637; and
- e) Deed dated as of January 1, 1996 by ROBERT C. BAKER and GERALD H. BAKER, AS TRUSTEES UNDER INDENTURE OF TRUST DATED JUNE 19, 1967 FOR THE BENEFIT OF RICHARD A. BAKER to RICHARD A BAKER, recorded in the Office of the Recorder of Franklin County, Pennsylvania on February 24, 1997 in Deed Book 1327 at Page 467; and
- f) Deed dated as of January 1, 1996 by ROBERT C. BAKER and GERALD H. BAKER, AS TRUSTEES UNDER INDENTURE OF TRUST DATED JUNE 19, 1967 FOR THE BENEFIT OF LAUREN S. BAKER to LAUREN S. RICHMAN (a/k/a Lauren S. Baker), recorded in the Office of the Recorder of Franklin County, Pennsylvania on February 24, 1997 in Deed Book 1327 at Page 473.

TOGETHER WITH all right, title and interest of parties of the first part, in, to and under all those certain leases, tenancies and occupancies affecting the aforementioned premises; and

TOGETHER WITH all right, title and interest of parties of the first part in and to any and all deposits by tenants, lessees or occupants of the aforementioned premises; and

TOGETHER WITH all right, title and interest of parties of the first part in and to any and all amounts heretofore paid or to be paid or repaid by tenants, lessees or occupants of the aforementioned premises, for fixtures, equipment or similar allowances; and

TOGETHER WITH all right, title and interest of parties of the first part in and to all fixtures and articles of personal property attached, appurtenant to, or used in connection with the aforementioned premises; and

TOGETHER WITH all right, title and interest of parties of the first part in, to and under that certain Easement for Drainage and that certain Easement for Utilities more particularly described and set forth in that certain Warranty Deed by RUTH G. OYLER to ROBERT C. BAKER, TRUSTEE, ET AL., dated March 13, 1968, recorded in the Office of the Recorder of Franklin County, Pennsylvania in Deed Book 623 at Page 858; and

Handwritten mark

TOGETHER WITH all right, title and interest of parties of the first part in, to and under that certain Easement for Drainage and the certain Easement for Utilities more particularly described and set forth in that certain Warranty Deed by HAROLD LESLIE BUHRMAN and SARAH MAUST BUHRMAN to ROBERT C. BAKER, TRUSTEE, ET AL., dated March 14, 1968, recorded in the Office of the Recorder of Franklin County, Pennsylvania in Deed Book 623 at Page 867.

TOGETHER WITH the party of the first part's collective right, title and interest in and to all and singular the improvements, ways, streets, alleys, driveways, passages, waters, water-courses, rights, liberties, privileges, hereditaments and appurtenances, whatsoever unto the hereby granted premises belonging, or in any wise appertaining, and the reversions and remainders, rents, issues, and profits thereof; and all the estate, right, title, interest, property, claim and demand whatsoever of said Grantor, as well at law as in equity, of, in and to the same.

TO HAVE AND TO HOLD the said lot or piece of ground described with the buildings and improvements thereon erected, hereditaments and premises hereby granted, or mentioned and intended so to be, with the appurtenances, unto the said Grantee, its successors and assigns, to and for the only proper use and behoof of the said Grantee, its successors and assigns forever.

The purpose of this deed is to convey the undivided twenty-three and one-third percent (23 1/3%) interest, as tenants-in-common in the conveyed premises, collectively owned by the party of the first part, to CHAMBERSBURG HOLDINGS L.P.

And the said Grantor, their heirs, executors and administrators do covenant, promise and agree, to and with the said Grantee, its successors and assigns, by these presents, that the said Grantor and their heirs all and singular the hereditaments and premises hereby granted or mentioned and intended so to be, with the appurtenances, unto the said Grantee, its successors and assigns, against the said Grantor and their heirs, and against all and every person and persons whomsoever lawfully claiming or to claim the same or any part thereof by, from and under them or any of them, shall and will WARRANT and forever DEFEND.

Subject to all easements, restrictions, covenants, agreements and other matters of record and to such state of facts an accurate survey and inspection of said premises would disclose and to the rights of tenants in possession, if any.

Handwritten mark

In witness whereof, the party of the first part hereunto set their hands and seals

Dated the day and year first above written.

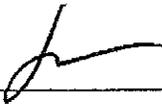
Sealed and Delivered
In the Presence of Us:

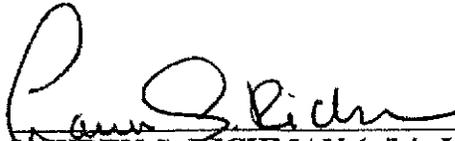
WITNESS:



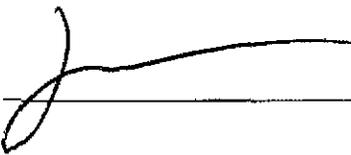


RICHARD A. BAKER





LAUREN S. RICHMAN (a/k/a Lauren S. Baker)





ROBERT C. BAKER, TRUSTEE,
UNDER INDENTURE OF TRUST
DATED JUNE 19, 1967 FOR THE
BENEFIT OF NELSON BAKER





GERALD H. BAKER, TRUSTEE,
UNDER INDENTURE OF TRUST
DATED JUNE 19, 1967 FOR THE
BENEFIT OF NELSON BAKER

COPY

RECORDED
MAY 2 2 08
2-14 03

LINDA MILLER
RECORDER OF DEEDS
FRANKLIN COUNTY

DEED	23.50
DEED - WRIT	.50
DEED - RIT STATE	8375.15
CHAMBERSBURG	4187.58
GUILFORD TOWNSHIP	4187.57
DEED AFFORDABLE HS	11.05
DEED A/H ADJDN FEE	1.95
L.C.S. / A.T.J	10.00
CG IMPROVEMENT FND	2.00
REC. IMPROVNT FUND	3.00
Check# 1368	\$4,239.57
Check# 1371	\$8,375.15
Check# 1370	\$4,187.58
Total Received.....	\$16,802.30

Remarks: BAKER RICHARD/CHRG HOLDINGS
DORNA/FRANKLIN JV

Inst# 2003-086820 5/02/2003 14:10:41

Receipt# 113907

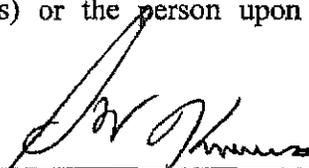
Franklin County - Recorder of Deeds
LINDA MILLER
Instrument Filings

VOL 2 | 25 PG 532

State of New York

County of Westchester } SS:

On the 14th day of January in the year 2023 before me, the undersigned, a Notary Public in and for said State, personally appeared **RICHARD A. BAKER**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s) or the person upon behalf of which the individual(s) acted, executed the instrument.

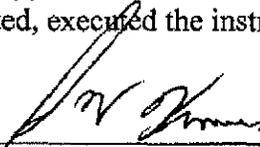


Notary Public

State of New York

County of Westchester } SS:

On the 5th day of February in the year 2023 before me, the undersigned, a Notary Public in and for said State, personally appeared **LAUREN S. RICHMAN (a/k/a Lauren S. Baker)**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s) or the person upon behalf of which the individual(s) acted, executed the instrument.



Notary Public



State of New York

County of Westchester } SS:

On the 27th day of February in the year 2003 before me, the undersigned, a Notary Public in and for said State, personally appeared **ROBERT C. BAKER**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s) or the person upon behalf of which the individual(s) acted, executed the instrument.

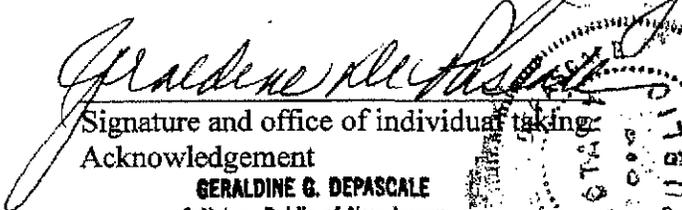
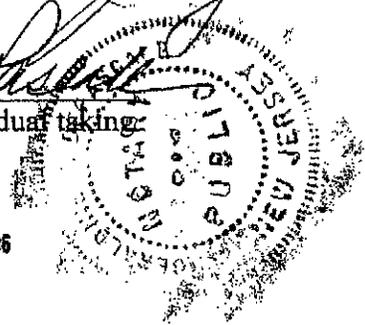


Notary Public

State of New Jersey

County of Hudson) ss.:

On the 15th day of March, in the year 2003 before me, the undersigned, personally appeared **GERALD H. BAKER**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), that by his/her/their signature(s) on the instrument, the individual(s) or the person upon behalf of which the individual(s) acted, executed the instrument, and that such individual made such appearance before the undersigned in the Town/City/Village of Hoboken, County of Hudson and State of New Jersey.


Signature and office of individual taking
Acknowledgement
GERALDINE G. DEPASCALE
A Notary Public of New Jersey
My Commission Expires 4/23/2006




DEED

**RICHARD A. BAKER;
LAUREN S. RICHMAN (a/k/a Lauren S. Baker); AND
ROBERT C. BAKER, TRUSTEE, AND GERALD H. BAKER, TRUSTEE
UNDER INDENTURE OF TRUST DATED JUNE 19, 1967
FOR THE BENEFIT OF NELSON J. BAKER**

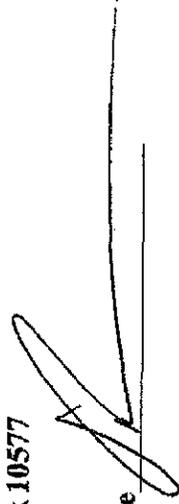
-TO-

CHAMBERSBURG HOLDINGS L.P.

**Premises: US ROUTE 30 -- LINCOLN WAY EAST
CHAMBERSBURG, PENNSYLVANIA**

**The Address of the above-named Grantee
Is: c/o National Realty & Development Corp.
3 Manhattanville Road
Purchase, New York 10577**

On Behalf of the Grantee



86820

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF REVENUE BUREAU OF INDIVIDUAL TAXES POST OFFICE BOX 8910 HARRISBURG, PA 17105-8910	REALTY TRANSFER TAX STATEMENT OF VALUE See Attached for Instructions	RECORDERS USE ONLY	
		BOOK NUMBER	8375.15
		PAGE NUMBER	2125
		DATE RECORDED	5-2-03

Complete each section and file in duplicate with Recorder of Deeds when (1) the full consideration is not set forth in the deed, (2) when the deed is without consideration, or by gift, or (3) a tax exemption is claimed. A Statement of Value is not required if the transfer is wholly exempt from tax based on: (1) family relationship or (2) public utility easement. If more space is needed, attach additional sheet(s)

A. CORRESPONDENT - All inquiries may be directed to the following person:

Name Steven V. Krauss	Telephone Number Area Code (914) 694-4444
Street Address c/o National Realty 3 Manhattanville Road	City State Zip Code Purchase New York 10577

B. TRANSFER DATA		Date of Acceptance of Document
Grantor(s) Lessor(s) See Attached Sheet	Grantee(s) Lessee(s) Chambersburg Holdings L.P.	
Street Address c/o National Realty 3 Manhattanville Road	Street Address c/o National Realty 3 Manhattanville Road	
City State Zip Code Purchase, New York 10577	City State Zip Code Purchase, New York 10577	

C. PROPERTY LOCATION	
Street Address Lincoln Way East - U.S. Route 30	City, Township, Borough Guilford

County Franklin	School District Chambersburg Area	Tax Parcel Number 09-0c22.-003.-000000, 10-0p05.-004.-000000 and 10-0p05.-004a-000000
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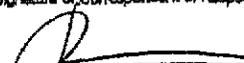
D. VALUATION DATA		
1. Actual Cash Consideration 00	2. Other Consideration +	3. Total Consideration = 00
4. County Assessed Value Total 606,310	5. Common Level Ratio Factor X 5.92	6. Fair Market Value = 3,589,355

E. EXEMPTION DATA	
1a. Amount of Exemption Claimed	1b. Percentage of Interest Conveyed 23 1/3 %

2. Check Appropriate Box Below for Exemption Claimed

- Will or intestate succession _____
(Name of Decedent) (Estate File Number)
- Transfer to Industrial Development Agency
- Transfer to agent or straw party. (Attach copy of agency/straw party agreement)
- Transfer between principal and agent. (Attach copy of agency/straw trust agreement). Tax paid prior deed \$ _____
- Transfers to the Commonwealth, the United States, and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (Attach copy of resolution)
- Transfer from mortgagor to a holder of a mortgage in default. Mortgage Book Number _____, Page Number _____.
- Corrective deed (attach copy of the prior deed).
- Statutory Corporate Consolidation, Merger or Division. (Attach copy of articles).
- Other (Please explain exemption claimed, if other than listed above.) _____

Under penalties of law, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.

Signature of Correspondent or Responsible Party 	Date 1/14/03
--	------------------------

GRANTORS

1. Richard A. Baker
2. Lauren S. Richman (a/k/a Lauren S. Baker)
3. Robert C. Baker, Trustee under Indenture of Trust dated June 19, 1967 for the benefit of Nelson J. Baker
4. Gerald H. Baker, Trustee under Indenture of Trust dated June 19, 1967 for the benefit of Nelson J. Baker

COPY

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.



Centerline

Parcel Within ROW

Parcels

ROW Approximately 130'

0 410 820 1,640 Feet

N



EXHIBIT A
 Owner:
 GBR LINCOLN HIGHWAY LIMITED
 Franklin PA
 Parcel ID: 1034.00
 Rice to Ringgold

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED
2018 MAY 15 AM 11:22
PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Guilford Water Authority in Guilford Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/sme
Enclosures

Rosemary Chiavetta, Secretary

May 15, 2018

Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

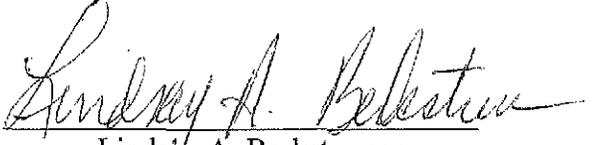
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Guilford Water Authority
115 Spring Valley Road
Chambersburg, PA 17202

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Guilford Water Authority in Guilford :
Township, Franklin County, Pennsylvania for :
the Siting and Construction of the 230 kV :
Transmission Line Associated with the :
Independence Energy Connection-West :
Project is Necessary or Proper for the Service, :
Accommodation, Convenience or Safety of the :
Public :
:

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Guilford Water Authority in Guilford Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA’s address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA’s attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

Transource PA’s attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC (“Transource Energy”).

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by Guilford Water Authority in Guilford Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Guilford Water Authority property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Guilford Water Authority. The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response, Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM's 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA's Maryland affiliate, Transource Maryland, LLC ("Transource MD"), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM's Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at 1240 Falling String Road, Chambersburg, Franklin County, Pennsylvania 17202.

32. A deed for the property is recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Deed Book 721, Page Number 171 and a copy of said recorded deed is attached hereto as Attachment A.

33. The name and mailing address of the owner of record of said tract of land is Guilford Water Authority, 115 Spring Valley Road, Chambersburg, PA 17202.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. *The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.*

37. A map depicting the proposed right-of-way across the Guilford Water Authority property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. §

1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Guilford Water Authority and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Guilford Water Authority and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying *Attachments and Testimony*, upon Guilford Water Authority, who is the record owner of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filling 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

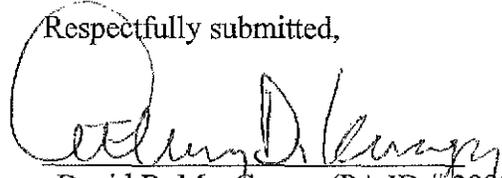
43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

Respectfully submitted,



Amanda Riggs Conner (District of Columbia ID # 481740)

Hector Garcia (VA ID # 48304)

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, OH 43215

Phone: 614-716-3410

Fax: 614-716-1613

E-mail: arconner@aep.com

E-mail: hgarci1@aep.com

David B. MacGregor (PA ID # 28804)

Anthony D Kanagy (PA ID # 85522)

Lindsay A. Berkstresser (PA ID # 318370)

Post & Schell, P.C.

17 North Second Street, 12th Floor

Harrisburg, PA 17101-1601

Phone: 717-731-1970

Fax: 717-731-1985

E-mail: dmacgregor@postschell.com

E-mail: akanagy@postschell.com

E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

THIS DEED

MADE the 30th day of December in the year nineteen hundred and seventy-five;
BETWEEN Chambersburg Area School Authority, a body politic and corporate, organized and existing under the laws of the Commonwealth of Pennsylvania, with principal office at 511 South Sixth Street, Chambersburg, Pennsylvania 17201, Grantor,
AND Guilford Water Authority, a body politic and corporate, organized and existing under the laws of the Commonwealth of Pennsylvania, with principal office at 1805 Lincoln Way East, Chambersburg, Pennsylvania and post office address at P. O. Box 21, Chambersburg, Pennsylvania 17201, Grantee.

WITNESSETH: WHEREAS, Guilford Township School Building Authority acquired a tract of land in Guilford Township, Franklin County, Pennsylvania by the deed in the recital of title set forth after the description of the tract herein conveyed;

AND WHEREAS, Guilford Township School Building Authority has undertaken and completed construction of a public school on said tract which was leased by said Authority to the School District of the Township of Guilford, Franklin County, Pennsylvania, for public school purposes, by Agreement of Lease dated as of September 15, 1965;

AND WHEREAS, Chambersburg Area School Authority, pursuant to merger proceedings, in accordance with applicable laws of the Commonwealth of Pennsylvania, has succeeded to all rights, privileges, obligations and duties and has become responsible for all debts, obligations and liabilities of Guilford Township School Building Authority, including those under and relating to said Agreement of Lease and is now the owner of said tract of real estate together with the improvements thereon;

AND WHEREAS, Chambersburg Area School District, in accordance with provisions of applicable laws of the Commonwealth of Pennsylvania relating to the reorganization of school districts, has come into existence and has succeeded to all rights, privileges, obligations and duties and has become responsible for all debts, obligations and liabilities of the School District of the Township of Guilford, Franklin County, Pennsylvania, including those under and relating to said Agreement of Lease;

AND WHEREAS, Chambersburg Area School District, pursuant to provisions of applicable laws of the Commonwealth of Pennsylvania, now is successor lessee to the School District of the Township of Guilford, Franklin County, Pennsylvania, under said Agreement of Lease;
AND WHEREAS, all right, title and interest of Guilford Township School Building Authority in and to said Agreement of Lease and all rentals payable thereunder and also all other revenues and money derived by Guilford Township School Building Authority in any manner from such school real estate heretofore were assigned, transferred and pledged unto Farmers and Merchants Trust Company of Chambersburg, Pennsylvania, as trustee, its successors in the trust and its assigns, forever, under a Trust Indenture, dated as of September 15, 1965, between Guilford Township School Building Authority and said trustee;

AND WHEREAS, said Trust Indenture, in Section 6.04, provides, in part, as follows:

"SECTION 6.04. The Authority covenants that, so long as Bonds shall remain outstanding, it will not sell, otherwise dispose of or encumber the School Property or rentals, revenues and money derived therefrom, except by the Lease, and except as permitted in this Section."

"The Authority, with written consent of the School District and the Department (if its approval shall be required), may sell and release from operation of the Lease any land which shall not be occupied by school buildings or required for access to public highways, upon filing with the Trustee a certified copy of a resolution of the Board of the Authority authorizing such sale and a certificate of the Authority and the School District approving the sale price, stating that it is not less than the fair market value of such land and certifying that such land is not required for school purposes; Provided, however, that conveyance of such land or interest therein to a municipality or other public authority or its dedication for use for public purposes may be made without consideration or for less than fair market value. Net proceeds from such sale shall be paid to the Trustee for deposit in the Bond Redemption Fund or, with written consent of the Department (if its approval shall be required), may be applied to replacement of land so conveyed."

AND WHEREAS, Chambersburg Area School District and Chambersburg Area School Authority have determined that it is desirable that a portion of the land described in said Agreement of Lease, which portion is hereinafter described in detail, shall be released from operation of said Agreement of Lease and shall be sold by Chambersburg Area School Authority;

AND WHEREAS, the Department of Education of the Commonwealth of Pennsylvania, by letter dated October 27, 1975, has given its approval to the sale of a portion of the land described in said Agreement of Lease, which portion is hereinafter described in detail;

AND WHEREAS, Chambersburg Area School Authority, after due advertisement in accordance with law, has received a proper bid for purchase of such portion of land described in said Agreement of Lease, which portion is hereinafter described in detail, the successful bidder being Guilford Water Authority, Grantee herein, at a purchase price of twenty-nine thousand (\$29,000.00) dollars;

AND WHEREAS, a portion of such land described in said Agreement of Lease, which portion is hereinafter described in detail, which has been released from operation of said Agreement of Lease and also sold to the Grantee, is not occupied by a school building or school buildings, is not required otherwise for school purposes and is not required for access to public highways;

AND WHEREAS, Chambersburg Area School Authority and Chambersburg Area School District have released the hereinafter described real estate from operation and scope of said Agreement of Lease, so that such land may be conveyed to said Grantee by said School Authority, by Resolutions authorizing the execution and delivery of a First Supplemental Agreement of Lease, dated as of December 1, 1975, to said Agreement of Lease, which First Supplemental Agreement of Lease is recorded in the Recorder's Office of Franklin County, Pennsylvania in Deed Book Volume 720, Page 988, the Resolution of Chambersburg Area School Authority having been adopted December 9, 1975 and the Resolution of Chambersburg Area School District having been adopted December 3, 1975;

AND WHEREAS, Chambersburg Area School Authority and Chambersburg Area School District have each further declared and agreed that the hereinafter described real estate released from operation and scope of said Agreement of Lease is released in accordance with and under and by virtue of provisions of said Section 6.04 of said Trust Indenture;

AND WHEREAS, Farmers and Merchants Trust Company of Chambersburg, Pennsylvania, trustee as aforesaid under said Trust Indenture, has by Consent and Release, dated December 11, 1975, consented to the aforesaid First Supplemental Agreement of Lease, dated as of December 1, 1975, and has confirmed and approved the action of Chambersburg Area School Authority and Chambersburg Area School District in entering into said First Supplemental Agreement of Lease and further approved of, consented and agreed to and joined in the release from operation and scope of said Agreement of Lease of the land hereinafter described as so released in said First Supplemental Agreement of Lease.

NOW KNOW ALL MEN BY THESE PRESENTS, that Grantor, for and in consideration of the sum of twenty-nine thousand (\$29,000.00) dollars, paid to it by Grantee, the receipt whereof is hereby acknowledged by Grantor, does hereby grant and convey in fee simple to said Grantee,

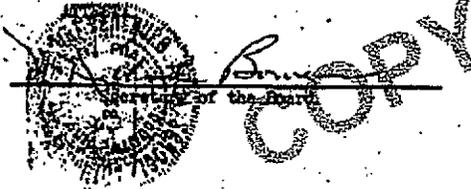
ALL the following described real estate, together with the improvements thereon, lying and being situate in Guilford Township, Franklin County, Pennsylvania, bounded and described as follows:-

BEGINNING at an existing iron pin at the corner of lands now or formerly of Glenn W. Benedict and the lands hereby conveyed; thence by lands now or formerly of Glenn W. Benedict South eighty-five (85) degrees fifty-four (54) minutes seventeen (17) seconds West five hundred thirty-six and ninety-three hundredths (536.93) feet to an iron pin which is three hundred (300) feet from a corner post; thence by lands of Guilford Township School Building Authority, now Chambersburg Area School Authority, North twenty-four (24) degrees fifty-four (54) minutes fourteen (14) seconds East seven hundred twelve and fifty-two hundredths (712.52) feet to a railroad spike in the public road known as L. R. 28003, also known as Falling Spring Road, which railroad spike is eighteen and four hundredths (18.04) feet from an iron pin on the last described line; thence in said public road by a curve to the right with radius of five hundred thirty-four and fifty-nine hundredths (534.59) feet, arc of forty-nine and two hundredths (49.02) feet, chord of forty-nine (49) feet and chord bearing South fifty-four (54) degrees forty-six (46) minutes twenty-seven (27) seconds East

to a railroad spike; thence by the east South fifty-two (52) degrees eight (8) minutes fifty (50) seconds East four hundred forty-six and six hundredths (446.06) feet to an existing railroad spike; thence by lands now or formerly of Glenn W. Benedict and passing through an iron pin eighteen and seventy hundredths (18.70) feet from the aforesaid existing railroad spike South twenty-seven (27) degrees seven (7) minutes twenty-seven (27) seconds West three hundred forty-three and seventy-four hundredths (343.74) feet to the existing iron pin, the place of beginning, containing five and seven hundred seventy-three thousandths (5.773) acres, more or less, as shown on draft No. 75 - 63 of survey made May 1, 1975, by William Lewis Arrowood, Registered Professional Engineer, attached hereto and made a part hereof.

The above described real estate is a portion of that real estate which School District of Guilford Township, Franklin County, Pennsylvania, by its deed dated September 22, 1965 and recorded in the Recorder's Office of Franklin County, Pennsylvania in Deed Book Volume 596, Page 243, conveyed to Guilford Township School Building Authority and said Authority, by merger approved by the Secretary of the Commonwealth of Pennsylvania on March 3, 1972, became part of Chambersburg Area School Authority, Grantor herein.

AND the said Grantor will warrant specially the property hereby conveyed.
 IN WITNESS WHEREOF, Chambersburg Area School Authority has caused these presents to be executed by the Vice-Chairman of its Board, and its corporate seal to be hereto affixed, attested by the Secretary of its Board, the day and year first above written.



CHAMBERSBURG AREA SCHOOL AUTHORITY

By M. Dice Statler
 Vice-Chairman of the Board

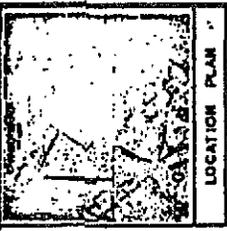
COMMONWEALTH OF PENNSYLVANIA :
 : SS:
 COUNTY OF FRANKLIN :

On this, the 30th day of December, 1975, before me, Julia J. Wright, the undersigned officer, personally appeared M. Dice Statler, who acknowledged himself to be the Vice-Chairman of the Board of Chambersburg Area School Authority, and that he as such Vice-Chairman, being authorized to do so, executed the foregoing instrument for the purposes therein contained by signing the name of Chambersburg Area School Authority by himself as Vice-Chairman of its Board.

In witness whereof, I hereunto set my hand and official seal.



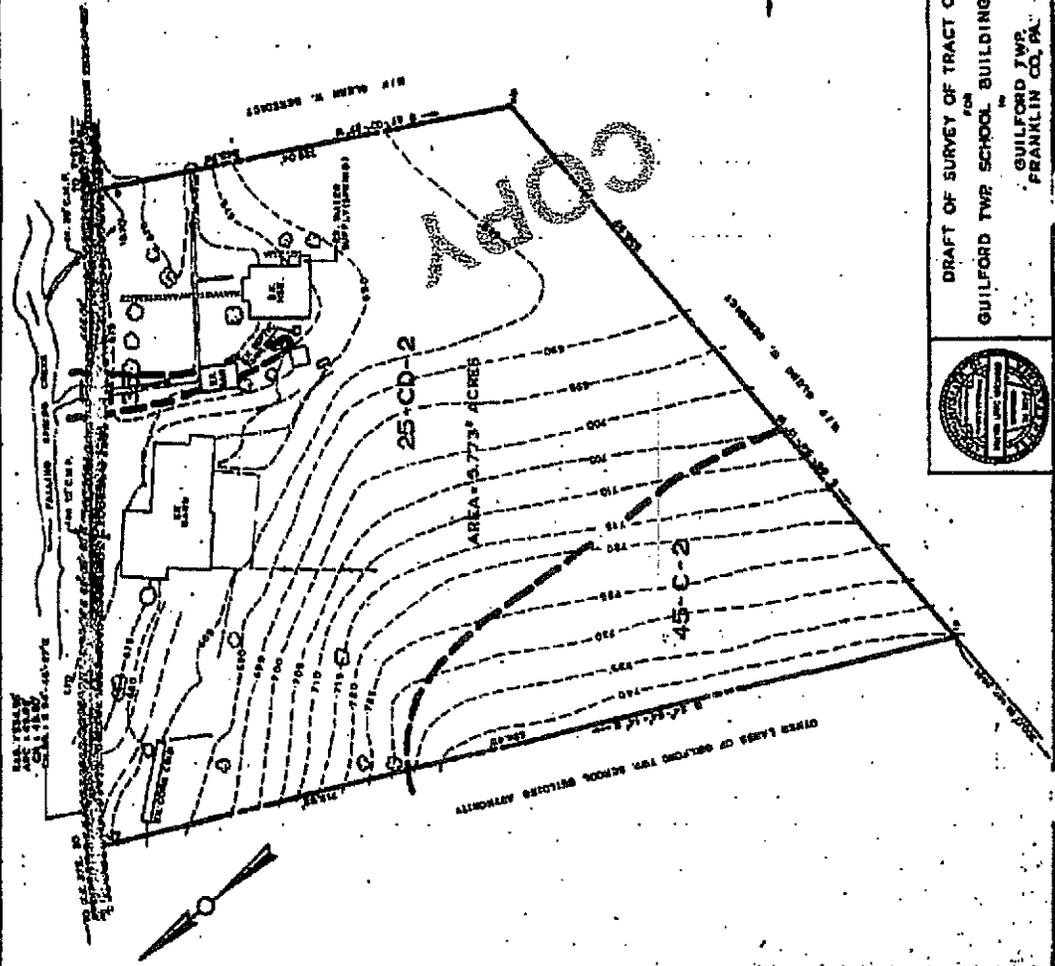
Julia J. Wright
 JULIA J. WRIGHTS - Notary Public
 Chambersburg Boro - Franklin County
 My Commission Expires June 6, 1975



Public Use to be established.
 Public Use to be established. All from all other subdivisions shown on this map. The use of this map is for information only. It is not to be used for any other purpose.

Legend
 - - - - - Proposed
 - - - - - Existing
 - - - - - Proposed

Notes
 1. This plan is prepared by reference to subdivision records only. It is not a warranty of title. It is not to be used for any other purpose. It is not to be used for any other purpose. It is not to be used for any other purpose.



721-171

SOILS LIMITATION FOR COMMUNITY DEVELOPMENT
 25-CD-2: WASHINGTON ROCK SOILS OF COMPLEX - 16VSE
 45-C-2: IMPROVED BLY SOILS - 16VSE

ARROWOOD, INCORPORATED ENGINEERING - SURVEYING - PLANNING CHAMBERSBURG, PENNSYLVANIA 17003	
Prepared by:	DATE:
Checked by:	DATE:
Approved by:	DATE:

DRAFT OF SURVEY OF TRACT OF LAND
 FOR
GUILFORD TWP SCHOOL BUILDING AUTHORITY
 IN
 GUILFORD TWP,
 FRANKLIN CO., PA.



OTHER LANDS OF GUILFORD TWP SCHOOL BUILDING AUTHORITY

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

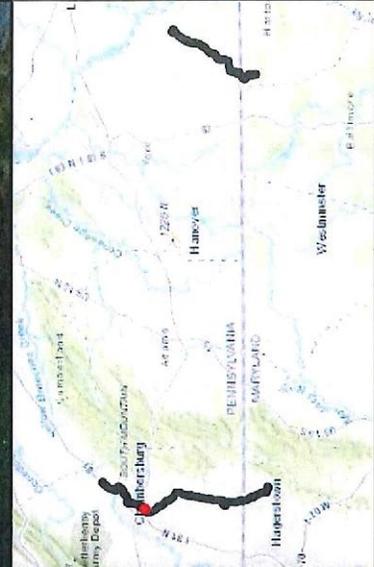
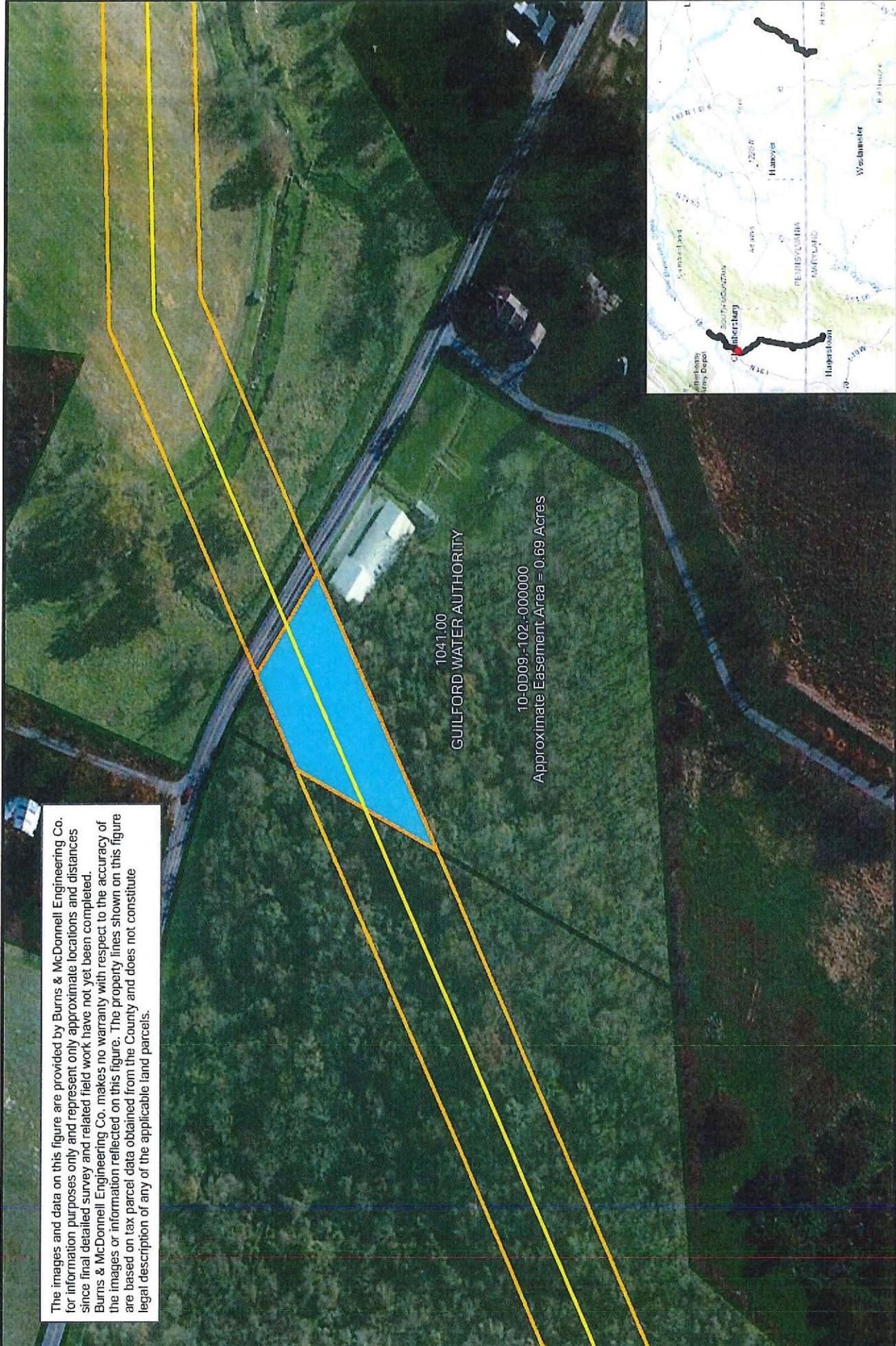
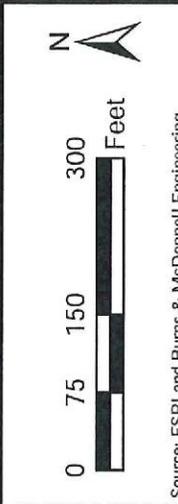


EXHIBIT A
 Owner:
 GUILFORD WATER AUTHORITY
 Franklin PA
 Parcel ID: 1041.00
 Rice to Ringgold



Centerline
 Parcel Within ROW
 Parcels
 ROW Approximately 130'

Source: ESRI and Burns & McDonnell Engineering, Inc.

Issued: April, 23 2018

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED
2018 MAY 15 AM 11:18
PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Mary K. Henry, Deceased, D. Yvonne Frank, Marion Carmack, Charles W. Henry (Letters Testamentary) in Guilford Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/sme

Rosemary Chiavetta, Secretary
May 15, 2018
Page 2

Enclosures

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

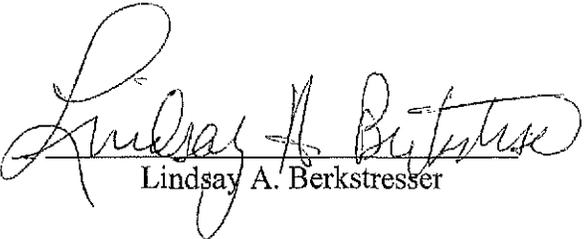
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mary K. Henry, Deceased
D. Yvonne Frank
Marion Carmack
Charles W. Henry
506 South Edwards Avenue
Chambersburg, PA 17202

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Mary K. Henry, Deceased, D. :
Yvonne Frank, Marion Carmack, Charles W. :
Henry (Letters Testamentary) in Guilford :
Township, Franklin County, Pennsylvania for :
the Siting and Construction of the 230 kV :
Transmission Line Associated with the :
Independence Energy Connection-West :
Project is Necessary or Proper for the Service, :
Accommodation, Convenience or Safety of the :
Public

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Mary K. Henry, Deceased, D. Yvonne Frank, Marion Carmack, Charles W. Henry (Letters Testamentary) in Guilford Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA's attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcial@aep.com

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by Mary K. Henry, Deceased, D. Yvonne Frank, Marion Carmack, Charles W. Henry (Letters Testamentary) in Guilford Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Mary K. Henry, Deceased, D. Yvonne Frank, Marion Carmack, Charles W. Henry (Letters Testamentary) property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Mary K. Henry, Deceased, D.

Yvonne Frank, Marion Carmack, Charles W. Henry (Letters Testamentary). The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response,

Transource Energy, the parent of Transource PA, submitted "Project 9A." The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM's 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA's Maryland affiliate, Transource Maryland, LLC ("Transource MD"), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM's Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in *Attachment 2 to the IEC-West Siting Application* and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at 1514 Henry Lane, Chambersburg, Franklin County, Pennsylvania 17202.

32. A deed for the property is recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Deed Book 537, Page Number 237 and a copy of said recorded deed is attached hereto as Attachment A.

33. The names and mailing address of the owners of record of said tract of land are Mary K. Henry, Deceased, D. Yvonne Frank, Marion Carmack, Charles W. Henry (Letters Testamentary), 506 South Edwards Avenue, Chambersburg, Pennsylvania 17202.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code ("NESC") clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the Mary K. Henry, Deceased, D. Yvonne Frank, Marion Carmack, Charles W. Henry (Letters Testamentary) property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to

date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Mary K. Henry, Deceased, D. Yvonne Frank, Marion Carmack, Charles W. Henry (Letters Testamentary) and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Mary K. Henry, Deceased, D. Yvonne Frank, Marion Carmack, Charles W. Henry (Letters Testamentary) and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Mary K. Henry, Deceased, D. Yvonne Frank, Marion Carmack, Charles W. Henry (Letters Testamentary), who is/are the record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2)

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Respectfully submitted,

Amanda Riggs Conner (District of Columbia ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com


David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

THIS DEED, ^

MADE the 30th day of *June* A.D. 1960, between

NAOMI E. HENRY, single, of Route #3, Chambersburg, Penna., EDGAR F. HENRY and MARY E. HENRY, his wife, of 113 North Carlisle St., Greencastle, Penna., ANDREW C. HENRY and ADA B. HENRY, his wife, of Reamstown, Penna., HOWARD W. HENRY and MARGIE F. HENRY, his wife, of 140 Addison Avenue, Greencastle, Pa., ARTHUR F. HENRY and GRACE E. HENRY, his wife, of Route No. 1, Gettysburg, Penna., OWEN C. HENRY and MARY L. HENRY, his wife, of Route #1, Chambersburg, Penna., HELEN H. MACLEAN and DUNCAN MACLEAN, her husband, of Ferry Street, South Hadley, Massachusetts and RUTH H. ZEGER and RALPH J. ZEGER, her husband, of 436 Philadelphia Avenue, Chambersburg, Penna.,

GRANTORS,

and WILBUR N. HENRY and MARY K. HENRY, his wife, of Guilford Township, Franklin County, Penna., as tenants by the entirety,

GRANTEES;

WITNESSETH, That in consideration of valuable consideration and Five (\$5.00) Dollars, in hand paid, the receipt whereof is hereby acknowledged, the said grantors do hereby grant and convey to the said grantees, ALL the following described real estate lying and being situate in Guilford Township, Franklin County, Pennsylvania, bounded and described as follows:

BEGINNING at a stone at the East side of the public road at the angle of land formerly of Mrs. Mary Ferguson, now Walter Wheelock; thence by same along the East side of said road, North 51-3/4 degrees West 76.4 perches to a stone; thence by the same, South 87 degrees West 11.5 perches to a stone at the South side of said road; thence by said road and continuing along lands now of Walter Wheelock, North 2 degrees East .5 of a perch to an iron pin in the middle of said public road; thence by the middle of said road, South 86 1/2 degrees West 18.1 perches to a drill hole in a rock; thence along lands of Walter Wheelock, North 4 degrees East 83.1 perches to a stone at lands formerly of Rev. Daniel Ely, now William and Dorothy Galloway; thence along lands of said William and Dorothy Galloway, South 54-3/4 degrees East 18.1 perches to a stone; thence along lands of Glenn Benedict, South 83 1/2 degrees East 86.3 perches to a stone; thence by lands

of John S. Lehman, South $9\frac{1}{2}$ degrees East 10.5 perches to a stone; thence continuing along lands of John S. Lehman, North $82\frac{1}{4}$ degrees East 7.5 perches to a stone; thence along lands formerly of Jacob S. Stoner and Harry Garber, South $35\frac{1}{4}$ degrees East 87.6 perches to a stone in the middle of a public road; thence by the middle of said public road, South $36\text{-}3\frac{1}{4}$ degrees West 25.8 perches to a point; thence continuing along said road, South $22\frac{1}{4}$ degrees West 56.4 perches to a stone; thence along the center of the public road first above mentioned, North $65\frac{1}{4}$ degrees West 31.6 perches to a stone; thence continuing along said road, North $19\frac{1}{4}$ degrees West 32.7 perches to the place of beginning; CONTAINING 93 acres $\frac{1}{4}$ perches, neat measure.

Andrew C. Henry by his deed dated April 20, 1901 and recorded in Franklin County Deed Book Vol. 160, Page 431, conveyed the above described land to Benjamin S. Henry. Benjamin S. Henry died November 21, 1928 intestate seized of the above described real estate, leaving to survive him, his widow, Naomi E. Henry and nine children, (1) Esther E. Johnston, (2) Edgar F. Henry, (3) A. C. Henry, (4) Howard W. Henry, (5) Arthur F. Henry, (6) Owen C. Henry, (7) Helen Henry Maclean, (8) Wilbur N. Henry, (9) Ruth Henry Zeger, they being his only heirs under the Intestate Laws of Pennsylvania.

570
 Esther E. Johnston died July 8, 1935 intestate and without issue, leaving to survive her as her sole heirs-at-law, her husband, Albert Johnston, and Naomi E. Henry. Albert Johnston by his deed dated January 11, 1956 and recorded in Franklin County Deed Book Vol. 484, Page 575 conveyed his interest in the real estate to his brothers-in-law and sisters-in-law above named.

This conveyance is made to vest the entire title in the real estate in Wilbur N. Henry and Mary K. Henry, his wife, grantees herein.

AND the said grantors will warrant generally the property hereby conveyed.

IN WITNESS WHEREOF, said grantors have hereunto set their hands and seals the day and year first above written.

Sealed and delivered in the presence of

Daunt Munn

Daunt Munn

Daunt Munn

Engene F. Brubaker

Engene F. Brubaker

Naomi E. Henry (SEAL)
 Naomi E. Henry

Edgar F. Henry (SEAL)
 Edgar F. Henry

Mary E. Henry (SEAL)
 Mary E. Henry

Andrew C. Henry (SEAL)
 Andrew C. Henry

Ada B. Henry (SEAL)
 Ada B. Henry

Daunt M. Mook

Howard W. Henry (SEAL)
Howard W. Henry

Daunt M. Mook

Margie F. Henry (SEAL)
Margie F. Henry

Robert P. Snyder

Arthur F. Henry (SEAL)
Arthur F. Henry

Robert P. Snyder

Grace E. Henry (SEAL)
Grace E. Henry

Daunt M. Mook

Owen C. Henry (SEAL)
Owen C. Henry

Daunt M. Mook

Mary L. Henry (SEAL)
Mary L. Henry

Katherine McCormick

Helen H. Maclean (SEAL)
Helen H. Maclean

Katherine McCormick

Duncan Maclean (SEAL)
Duncan Maclean

Daunt M. Mook

Ruth H. Zeger (SEAL)
Ruth H. Zeger

Daunt M. Mook

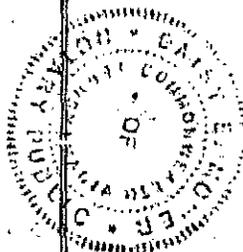
Ralph J. Zeger (SEAL)
Ralph J. Zeger

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF FRANKLIN) SS:

On this, the 11 day of July A.D. 1960, before me,
Daunt M. Mook, the undersigned officer, personally

Name of Officer
appeared Naomi E. Henry, single, Edgar F. Henry and Mary E. Henry, his wife, Howard W. Henry and Margie F. Henry, his wife, Owen C. Henry and Mary L. Henry, his wife and Ruth H. Zeger and Ralph J. Zeger, her husband, grantors herein, known to me (or satisfactorily proven) to be the persons whose names are subscribed to the within instrument, and acknowledged that they executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.



Daunt M. Mook
Notary Public

My Commission expires March 6 1963
I maintain my office in
Chambersburg, Mifflin Co. Pa.

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF Lancaster) ss:

On this, the 30th day of June A.D.1960, before me,
A. Notary Public the undersigned officer, personally ap-
Name of Officer
peared Andrew C. Henry and Ada B. Henry, his wife, grantors here-
in, known to me (or satisfactorily proven) to be the persons whose
names are subscribed to the within instrument, and acknowledged
that they executed the same for the purposes therein contained.
In witness whereof, I hereunto set my hand and official seal.

EUGENE K. BRUBAKER, Notary Public
Denver, Lancaster County, Penna.
My Commission Expires March 7, 1962

Eugene K. Brubaker
Notary Public

My Commission expires Mar. 7th 1962

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF ADAMS) ss:

On this, the 30th day of JUNE A.D.1960, before me,
Robert P. Snyder the undersigned officer, personally ap-
Name of Officer
peared Arthur F. Henry and Grace E. Henry, his wife, grantors here-
in, known to me (or satisfactorily proven) to be the persons whose
names are subscribed to the within instrument, and acknowledged
that they executed the same for the purposes therein contained.
In witness whereof, I hereunto set my hand and official seal.

Robert P. Snyder
Notary Public

My Commission expires June 6, 1964
ROBERT P. SNYDER, Justice of the Peace
para. 5102, Chapter 51, Pa.
My Commission Expires Jan. 6, 1964

STATE OF MASSACHUSETTS)
COUNTY OF Hampden) ss:

On this, the 7th day of July A.D.1960, before me,
Katherine McCormick the undersigned officer, personally ap-
Name of Officer
peared Helen H. Maclean and Duncan Maclean, her husband, grantors
herein, known to me (or satisfactorily proven) to be the persons
whose names are subscribed to the within instrument, and acknowl-
edged that they executed the same for the purposes therein con-
tained.

Katherine McCormick
Notary Public

-4-



In witness whereof, I hereunto set my hand and official seal.

Notary Public

My Commission expires _____

CERTIFICATE OF RESIDENCE

I hereby certify that the precise residence of the grantees herein is Route No. 5, Chambersburg, Penna.

Witness my hand this 3 day of Sept - A.D. 1960.

Thos. H. Hurdine

at Chambersburg

COPY

ENTERED ON RECORD SEP 3 1960 11-25	D E E D A.D. 1960	NAOMI E. HENRY, et al., Grantors, To WILLIAM N. HENRY and MARY K. HENRY, his wife, Grantees.
--	----------------------	---

ROY S. F. ANGLE
 ATTORNEY AT LAW
 WAYNESBORO, PA.
 80 W. Main St.

HINA
 3498

1000
 100
 11

State of Pennsylvania
 County of Franklin
 Recorded in the office for Recording Deeds, so
 and for said county in Deeds Books,
 No. 537 Page 237
 Witness my hand and seal of the said office this
9th day of Sept A. D. 1960
Charles W. Mark
 7th Floor

School District of Shillington
 Township, Franklin County, Pa.
 Tax on Deeds Resolution, 1960
 Amount of Tax 100.00
 Received Payment Charles W. Mark
 Collector

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

1046.00
HENRY, HENRY N.
HENRY, MARY K. H&W

10-0D08-.038-.000000
Approximate Easement Area = 3.09 Acres

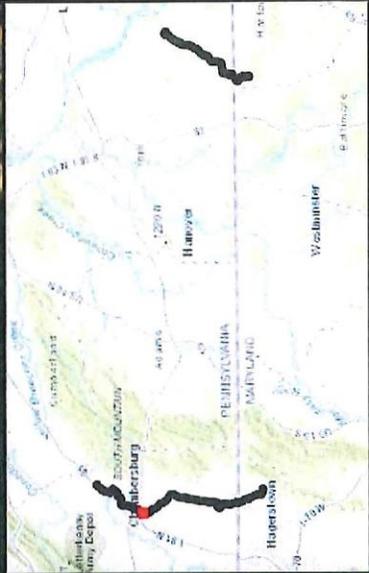


EXHIBIT A

Owner:
HENRY, HENRY N.
Franklin PA
Parcel ID: 1046.00
Rice to Ringgold



Source: ESRI and Burns & McDonnell Engineering.

-  Centerline
-  Parcels
-  Parcel Within ROW
-  ROW Approximately 130'

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED
2018 MAY 15 AM 11:28
PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

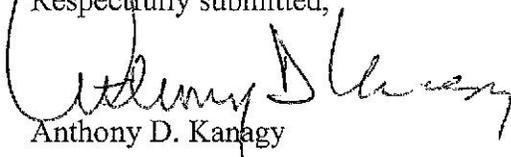
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Ivan D. Horst and Ellen M. Horst in Guilford and Washington Townships, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Anthony D. Kanagy

ADK/sme
Enclosures

Rosemary Chiavetta, Secretary
May 15, 2018
Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

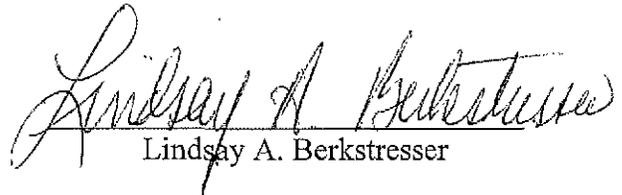
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Ivan D. Horst
Ellen M. Horst
2732 Sollenberger Drive
Chambersburg, PA 17202

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Ivan D. & Ellen M. Horst in :
Washington Township, Franklin County, :
Pennsylvania for the Siting and Construction :
of the 230 kV Transmission Line Associated :
with the **Independence Energy Connection-** :
West Project is Necessary or Proper for the :
Service, Accommodation, Convenience or :
Safety of the Public :
:

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Ivan D. & Ellen M. Horst in Washington Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA’s address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA’s attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
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E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
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Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

Transource PA’s attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC (“Transource Energy”).

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by Ivan D. & Ellen M. Horst in Washington Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Ivan D. & Ellen M. Horst property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Ivan D. & Ellen M. Horst. The IEC-

West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response,

Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA’s Maryland affiliate, Transource Maryland, LLC (“Transource MD”), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM’s Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at Koons Road, Waynesboro, Franklin County, Pennsylvania 17268.

32. A deed for the properties are recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania at Instrument Number 201706907 and a copy of said recorded deed is attached hereto as Attachment A.

33. The name(s) and mailing address of the owners of record of said tract of land are/is: Ivan D. & Ellen M. Horst, 2732 Sollenberger Drive, Chambersburg, Pennsylvania 17202.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the Ivan D. & Ellen M. Horst property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. §

1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Ivan D. & Ellen M. Horst and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Ivan D. & Ellen M. Horst and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Ivan D. & Ellen M. Horst, who is/are the record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

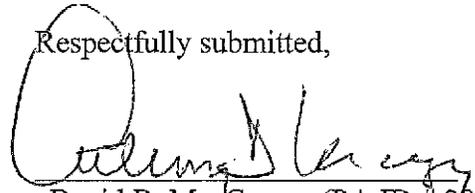
43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

Respectfully submitted,



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Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

PURPART I:

UPI: 16-4A36.-001.-000000

STREET ADDRESS: Fir Street, Mont Alto, PA 17237

UPI: 16-4A36.-023A-000000

STREET ADDRESS: 113 Ash Street, Mont Alto, PA 17237

UPI: 19-0L03.-005.-000000

STREETADDRESS: Anthony Highway, Waynesboro, PA 17268

PURPART II:

UPI: 10-0D15.-065.-000000

STREET ADDRESS: 3244 New Franklin Road, Chambersburg, PA 17202

PURPART III:

UPI: 23-0Q06.-008C-000000

STREET ADDRESS: Koons Road, Waynesboro, PA 17268

UPI: 23-0Q02.-003.-000000

STREET ADDRESS: Wharf Road, Waynesboro, PA 17268

UPI: 23-0Q02.-010A-000000

STREET ADDRESS: Koons Road, Waynesboro, PA 17268

UPI: 23-0Q02.-013.-000000

STREET ADDRESS: 10888 Koons Road, Waynesboro, PA 17268

UPI: 19-0L17.-009A-000000

STREET ADDRESS: Wharf Road, Waynesboro, PA 17268

PURPART IV:

UPI: 10-0D09.-034.-000000

STREET ADDRESS: Spring Road, Chambersburg, PA 17202

THIS DEED

MADE the 6th day of April
in the year two thousand seventeen (2017)

BETWEEN IVAN D. HORST and ELLEN M. HORST, husband and wife, of 2732 Sollenberger Drive, Chambersburg, Pennsylvania-----GRANTORS

and IVAN D. HORST and ELLEN M. HORST, husband and wife, of 2732 Sollenberger Drive, Chambersburg, Pennsylvania, as tenants by the entireties-----GRANTEES

WITNESSETH, That in consideration of other good and valuable considerations and the sum of Two (\$2.00)-----Dollars, in hand paid, the receipt whereof is hereby acknowledged, the said grantors do hereby grant and convey to the said grantees, in fee simple,

PURPART I:

ALL the following described two (2) tracts of real estate, together with the improvements thereon erected, lying and being situate in the Borough of Mont Alto, Quincy Township and Guilford Township (which was omitted in the prior deed), Franklin County, Pennsylvania, bounded and limited as follows:

TRACT NO. 1:

BEGINNING at stone; thence along lands now or formerly of Dr. Ivan J. McCormick, North 30 ½ degrees West, 169.8 perches to a stump; thence by lands now or formerly of John Yohe, North 67 ½ degrees East, 51.3 perches to a stone; thence by the same, North 24 ¼ degrees West, 29.6 perches to a stone; thence by the same, North 79 ¾ degrees East, 105.2 perches to a limestone; thence along the public road known as Pennsylvania Route 997 and lands now or formerly of Charles W. Lowry, South 7 degrees East, 98 perches to a graveyard; thence continuing along said public road from said graveyard and lands now or formerly of George W. Lowry, 68.7 perches to a stone; thence along the Pennsylvania Railroad, formerly the Mont Alto Railroad, South 68 ½ degrees West, 47.5 perches to a point marked with stones; thence continuing along same, South 65 degrees West, 37.8 perches to the stone, the place of BEGINNING. CONTAINING 133 acres and 63 perches, more or less.

INCLUDED IN THE ABOVE DESCRIPTION, BUT EXPRESSLY EXCLUDED FROM THIS DEED OF CONVEYANCE ARE ALL THE FOLLOWING TRACTS:

- A. Tract conveyed to Trustees of Alto Dale Graveyard, by deed dated July 22, 1905, and recorded in the Recorder's Office of Franklin County, Pennsylvania, in Deed Book Volume 155, Page 249; and
- B. Tract conveyed to Cumberland Valley Railroad Company, by deed dated September 13, 1911, and recorded in the Recorder's Office aforesaid, in Deed Book Volume 164, Page 144; and
- C. Tract conveyed to Mont Alto Garment Company, by deed dated July 3, 1918, and recorded in the Recorder's Office aforesaid, in Deed Book Volume 155, Page 249; and
- D. Tract conveyed to Mont Alto Cemetery Association, by deed dated August 3, 1918, and recorded in the Recorder's Office aforesaid, in Deed Book Volume 189, Page 468; and

- E. Tract conveyed to Carroll Shoe Company, by deed dated November 28, 1956, and recorded in the Recorder's Office aforesaid, in Deed Book Volume 486, Page 566; and
- F. Tract conveyed to David R. Monn and wife, by deed dated February 28, 1958, and recorded in the Recorder's Office aforesaid, in Deed Book Volume 500, Page 528; and
- G. Tract conveyed to Charles A. Recard and wife, by deed dated October 2, 1963, and recorded in the Recorder's Office aforesaid, in Deed Book Volume 576, Page 298;
- H. Tract conveyed to Mont Alto Cemetery by deed dated November 1, 2012 and recorded in the Office of the Recorder of Deeds of Franklin County as instrument #2012-23304.
- I. A tract of land which Pansye B. Shenefelt reserved unto herself and furthermore, less the following conveyances from Roy B. Cluck:
 - 1. Deed to Borough of Mont Alto, dated August 11, 1969, and recorded in the Recorder's Office aforesaid, in Deed Book Volume 641, Page 570; and
 - 2. Deed to Mont Alto Volunteer Fire Company, dated December 15, 1972, and recorded in the Recorder's Office aforesaid, in Deed Book Volume 682, Page 840; and
 - 3. Deed to David R. Monn and Norma J. Monn, his wife, dated May 24, 1974, and recorded in the Recorder's Office aforesaid, in Deed Book Volume 700, Page 989; and
 - 4. Deed to Donald L. Eberly and Wanda K. Eberly, his wife, dated March 8, 1985, and recorded in the Recorder's Office aforesaid, in Deed Book Volume 925, Page 182.

TRACT NO. 2:

BEGINNING at an iron pin at the northwest corner of Tract No. 2; thence along lands of the Borough of Mont Alto, South 86 degrees 36 minutes 50 seconds West, 245.77 feet to an iron pin at lands now or formerly of Roy B. Cluck; thence along said lands, North 2 degrees 48 minutes 50 seconds East, 161.63 feet to an iron pin at lands now or formerly of Roy B. Cluck; thence along said lands, North 85 degrees 00 minutes 55 seconds East, 225.23 feet to an axle at lands now or formerly of Pansye B. Shenefelt; thence along said lands, South 4 degrees 28 minutes 30 seconds East, 167.00 feet to an iron pin at the place of BEGINNING. CONTAINING 38,553 square feet and being Lot No. 1 on "Survey of land situate

in the Borough of Mont Alto, Franklin County, PA, to be conveyed by Roy B. Cluck to Mont Alto Volunteer Fire Co.”

PURPART II:

ALL the following described real estate, lying and being situate in Guilford Township, Franklin County, Pennsylvania, bounded and described as follows:

BEGINNING at a set spike in the center line of public road, L.R 28020, at corner of lands now or formerly of Stuart A. Walker and wife; thence in the center line of said L.R. 28020, South 65 degrees 42 minutes 40 seconds East, 115 feet to a set spike at corner of other lands now or formerly of Stuart A. Walker and wife; thence along said other lands of Stuart A. Walker and wife, South 42 degrees 17 minutes 20 seconds West, 182.34 feet to an iron pin; thence by same, North 47 degrees 42 minutes 40 seconds West, 109.37 feet to an iron pin; thence by same North 42 degrees 17 minutes 20 seconds East, 146.80 feet to a set spike in the center line of public road L.R. 28020, the place of beginning as shown by draft of William A. Brindle, R.S., dated August 31, 1978, approved by the Supervisors of Guilford Township, September 8, 1978.

BEING the same real estate conveyed to Ivan D. Horst and Ellen M. Horst, husband and wife, by deed of Ivan D. Horst and Ellen M. Horst, husband and wife, dated May 9, 2007 and recorded in Franklin County Volume 3470, page 8.

PURPART III:

ALL the real estate described on Exhibit A, attached hereto:

BEING the same real estate conveyed to Ivan D. Horst and Ellen M. Horst, husband and wife, by deed of Douglas G. Horst and Yavonne M. Horst, husband and wife, dated December 21, 2010 and recorded in the Office of the Recorder of Deeds of Franklin County as instrument #2010-25293.

PURPART IV:

ALL the following described real estate lying and being situate in Guilford Township, Franklin County, Pennsylvania, bounded and limited as follows:

BEGINNING at a spike in the centerline of T-505 (Spring Road) at corner of lands now or formerly of Aldus R. Eby and Anna Lois Eby, as shown on a survey hereinafter referred to; thence with said lands now or formerly of Eby, South 54 degrees 51 minutes 47 seconds West, 49.62 feet to a set iron pin; thence with the same, South 25 degrees 19 minutes 27 seconds East, 819.07 feet to a set iron pin at corner of lands now or formerly of Ernest Wingert, et al., thence along lands now or formerly of Ernest Wingert, et al., South 64 degrees 02 minutes 30 seconds West, 941.14 feet to a set magnail in the centerline of S.R. 2029 (Falling Spring Road); thence along the centerline of S. R. 2029, North 60 degrees 09 minutes 53 seconds West, 68.79 feet to a set magnail; thence continuing along the

centerline of said public road, North 58 degrees 40 minutes 20 seconds West, 391.96 feet to a set magnail at corner of lands now or formerly of Robin E. Myers; thence with said lands now or formerly of Myers, North 31 degrees 19 minutes 40 seconds East, 185.00 feet to an existing iron pin; thence with said lands now or formerly of Myers and lands now or formerly of Kimberly S. Hernandez, North 58 degrees 40 minutes 20 seconds West, 160.00 feet to an existing iron pin at corner common to the said lands now or formerly of Hernandez, to lands now of formerly of Vicki E. Neff, to the tract herein conveyed and to lands now or formerly of Charlotte H. Brandon; thence with lands now or formerly of Brandon and lands now or formerly of Danelle M. Burkett, North 08 degrees 52 minutes 16 seconds East, 147.94 feet to an existing iron pin at corner of lands now or formerly of Trina R. Ott; thence with lands now or formerly of Ott, North 12 degrees 03 minutes 49 seconds West, 94.34 feet to an existing iron pin at corner of lands now or formerly of James E. Butler and Michelle M. Butler; thence with said lands now or formerly of Butler, lands now or formerly of Elizabeth A. Colon, lands now or formerly of David W. Dennis and Glenda R. Dennis, lands now or formerly of Cindy M. Reeder and lands now or formerly of Ginger R. Bricker, North 19 degrees 56 minutes 30 seconds East, 457.98 feet to an existing iron pin; thence with lands now or formerly of Bricker, North 67 degrees 34 minutes 32 seconds West, 14.89 feet to a set iron pin; thence with the same, on a curve to the left having a radius of 40.00 feet, a chord bearing of South 83 degrees 09 minutes 05 seconds West, a chord length of 39.12 feet and an arc length of 40.87 feet to a set iron pin in the easterly right-of-way line of Meadow Green Lane; thence along the said right-of-way line on a curve to the left having a radius of 250.00 feet, a chord bearing of North 40 degrees 15 minutes 37 seconds East, a chord length of 117.73 feet and an arc length of 118.84 feet to an iron pin at lands now or formerly of Troy D. Morter and Michelle K. Morter; thence with said lands now or formerly of Morter on a curve to the left having a radius of 40.00 feet, a chord bearing of South 20 degrees 28 minutes 01 second East, a chord length of 56.61 feet and an arc length of 65.78 feet to an iron pin; thence with the same, South 67 degrees 34 minutes 32 seconds East, 55.66 feet to a set iron pin; thence with the same and lands now or formerly of George E. Clark, Jr., North 22 degrees 25 minutes 28 seconds East, 289.28 feet to a set magnail in the centerline of T-505 (Spring Road); thence along the centerline of T-505, South 67 degrees 11 minutes 03 seconds East, 194.15 feet to a set magnail; thence continuing along the centerline of T-505, South 67 degrees 49 minutes 48 seconds East, 461.50 feet to an existing spike at lands now or formerly of Eby, the place of beginning. CONTAINING 26.8605 acres (1,170,041.45 square feet) as shown on a survey prepared by Mico Enterprises, Inc. by Curfman & Zullinger Surveying Inc., dated October 28, 2004 and recorded in Franklin County Plat Book 288I, page 971.

Being the same real estate conveyed to Ivan D. Horst and Ellen M. Horst, husband and wife, by deed of Salt Creek Partners, LLC dated November 12, 2015 and recorded in the Office of the Recorder of Deeds of Franklin County as instrument 2015-22036.

This transaction is exempt from Pennsylvania Transfer Tax being a conveyance between spouses.

SUBJECT, however, to all conditions, easements, restrictions and other matters legally affecting the same or noted on the aforesaid surveys.

AND the said grantors will warrant specially the property hereby conveyed.

IN WITNESS WHEREOF, said grantors have executed this deed the day and year first above written.

Sealed and delivered in the presence of

[Signature]

Ivan D. Horst (SEAL)
Ivan D. Horst

[Signature]

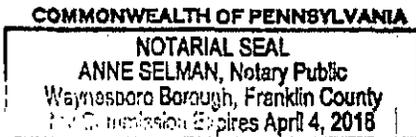
Ellen M. Horst (SEAL)
Ellen M. Horst

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF FRANKLIN

On this, the 6th day of April, 2017, before me, a notary public, the undersigned officer, personally appeared Ivan D. Horst and Ellen M. Horst, known to me (or satisfactorily proven) to be the persons whose names are subscribed to the within instrument, and acknowledged that they executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.



Anne Selman
Notary Public
My Commission expires _____

CERTIFICATE OF RESIDENCE

I hereby certify that the precise residence of the grantees herein is 2732 Sollenberger Drive, Chambersburg, PA 17201.

Witness my hand this 6th day of April, 2017.

[Signature]
On behalf of Grantees

Exhibit A

ALL the following described real estate lying and being situate nineteen (19%) percent in Quincy Township and eighty-one (81%) percent in Washington Township, Franklin County, Pennsylvania, bounded and described as follows:

TRACT NO. 1:

BEGINNING at a stone, a corner of lands now or formerly of David Hade, and running thence, South 54 degrees West 50.5 perches to a stone; thence South 32.25 degrees East 10 perches to a stone; thence South 34.5 degrees West 47.1 perches to a stone; thence North 42.25 degrees West 58.8 perches to a stone; thence North 50 degrees East 52.8 perches to a stone; thence North 34.25 degrees West 54.28 perches to a stone; thence North 35 degrees East 53.2 perches to a stone; thence South 48.25 degrees East 52 perches to a stone; thence South 36 degrees West 11.6 perches to a stone; thence South 41 degrees East 43.7 perches to a stone; thence South 13.5 degrees East 20.33 perches to a stone; the place of beginning. CONTAINING 52 acres 3 square perches of land, neat measure.

Included within the above described real estate but specifically excluded therefrom are the following adverse conveyances:

- A. A conveyance of 6.89 acres recorded in Franklin County Deed Book 679, page 244.
- B. A conveyance of 3.217 acres recorded in Franklin County Deed Book 693, page 433.
- C. Lot 2 and Parcel A shown on survey of Dennis E. Kauffman dated November 1, 2005 and recorded in Franklin County Plat Book 288J, page 181.

Tract No. 1, less the foregoing exclusions, contains 53 acres of land, more or less.

TRACT NO. 2:

BEGINNING at a stone, a corner of land now or formerly of Snowberger, thence North 44.5 degrees West 140 perches to a stone; thence by lands now or formerly of Norman Helman, South 55.5 degrees West 47 perches to a stone; thence South 2 degrees West 11.04 perches to a stone; thence South 47 degrees East 37.9 perches to a stone; thence South 64 degrees West 20 perches to a stone; thence South 41 degrees West 15.04 perches to a stone; (the last two courses and distances were inadvertently omitted from the prior deed due to scrivener error); thence by lands now or formerly of Byers Pentz, South 47.25 degrees East 68.48 perches to a point; thence by lands now or formerly of Herman J. Tharp, North 35 degrees East 34.1 perches to a stone; thence South 48.25 degrees East 52 perches to a stone; thence by lands now or formerly of Norman Helman, South 85.75 degrees East 12.08 perches to a point; thence by lands now or formerly of Will Tharp, North 13.50 degrees West 9.17 perches to a stump; thence North 34.50 degrees East 34.1 perches to the place of beginning. CONTAINING 61 acres and 12 perches of land, neat measure.

Included within the above described real estate but specifically excluded therefrom are the following adverse conveyances:

- A. A conveyance of 1.099 acres recorded in Franklin County Deed Book 660, page 922.
- B. A conveyance recorded in Franklin County Deed Book 605, page 506.

Tract No. 2, less the foregoing exclusions, contains 60 acres of land, more or less.

TRACT NO. 3:

BEGINNING at a spike in the center of Washington Township Route 388; thence along said road and continuing across said road at a bend, North 21 degrees 8 minutes 12 seconds East 675.7 feet to an iron pin; thence along lands now or formerly of Robert C. Koons, North 20 degrees 46 minutes 48 seconds East 416.25 feet to an iron pin; thence along lands now or formerly of John D.

Downin, South 74 degrees 16 minutes 4 seconds East 601.48 feet to an iron pin at a post; thence along lands now or formerly of Raymond Burkholder, South 53 degrees 15 minutes East 1,389.07 feet to an iron pin; thence along lands now or formerly of Josie Keller, South 38 degrees 42 minutes 39 seconds West 580.74 feet to an iron pin; thence continuing along lands now or formerly of Josie Keller, South 32 degrees 13 minutes West 494.73 feet to an iron pin; thence along lands now or formerly of Wayne A. Sowers, North 59 degrees 49 minutes 55 seconds West 1,684.48 feet to a spike at the place of beginning. CONTAINING 47.974 acres as per survey of William A. Brindle, dated August 9, 1974 and recorded in Franklin County Deed Book 706, page 433.

LESS, however, the real estate containing 3.9338 acres on which is situated the dwelling house of John N. Beaver and Susan D. Beaver. (Franklin County Deed Book reference, Volume 1471, page 402)

Tract No. 3, less the foregoing exclusion, contains 44.0402 acres, more or less.

TRACT NO. 4:

BEGINNING at an iron pin in the Northern edge of Legislative Route 28029, a corner of lands now or formerly of Carman W. Rowe; thence with said Legislative Route the following courses and distances: South 78 degrees 02 minutes 52 seconds West 429.65 feet to a spike; thence South 68 degrees 20 minutes 46 seconds West 93.39 feet to a spike; thence South 61 degrees 09 minutes 56 seconds West 255.42 feet to a spike; thence South 64 degrees 36 minutes 46 seconds West 61.20 feet to a set spike; thence leaving said Legislative Route and by lands now or formerly of Ellis L. Sharrah, South 37 degrees 33 minutes 01 second East 250.4 feet to an iron pin; thence by lands now or formerly of Gerald W. Martin, South 30 degrees 02 minutes 39 seconds West 1,869.21 feet to an iron pin at a planted stone; thence by lands now or formerly of Jeffery Green, North 48 degrees 15 minutes 44 seconds West 744 feet to an iron pin; thence by lands now or formerly of John N. Beaver, North 48 degrees 52 minutes 22 seconds West 1,211.32 feet to a spike in Legislative Route 28029; thence still by the same, North 48 degrees 52 minutes 22 seconds West 626.03 feet to a set iron pin in post at lands now or formerly of Richard O. Mong; thence by the latter, North 55 degrees 16 minutes 59 seconds East 709.5 feet to a planted stone; thence still by the same, North 56 degrees 15 minutes 00 seconds East 2,014.65 feet to a set iron pin at post; thence by lands now or formerly of Harry J. Waganian, South 21 degrees 06 minutes 15 seconds East 134.60 feet to a set iron pin at post; thence North 66 degrees 00 minutes 43 seconds East 323.37 feet to set iron pin at stump; thence by lands now or formerly of Carman W. Rowe the following courses and distances: South 23 degrees 05 minutes 30 seconds East 62.40 feet to an iron pin; South 08 degrees 39 minutes 58 seconds East 99.01 feet to an iron pin; thence South 32 degrees 30 minutes 34 seconds East 590.48 feet to the place of beginning.

LESS, however, the following exclusion which is located within the perimeter of the real estate described above:

BEGINNING at a P.K. nail in Legislative Route 28029 which point is North 57 degrees 49 minutes 54 seconds East 394.8 feet from a set spike in said Legislative Route at the property line of lands now or formerly of John N. Beaver; thence with said Legislative Route and by lands now or formerly of Dennis E. Kauffman, Samuel W. Gates, James A. Laman and Harold E. Ditch, North 58 degrees 51 minutes 14.3 seconds East 500 feet to a P.K. nail in said Legislative Route and by the larger tract of which this exclusion was formerly a part, the following courses and distances: South 31 degrees 09 minutes 44 seconds East 348.35 feet to an iron pin; South 58 degrees 50 minutes 00 seconds West 374.98 feet to an iron pin; South 28 degrees 32 minutes 06 seconds West 144.73 feet to an iron pin; North 31 degrees 10 minutes 18 seconds West 421.55 feet to the P.K. nail, the place of beginning of this exclusion.

CONTAINING 72.655 acres and is designated as Parcel A as per survey of Thomas Michael Englerth dated September 16, 17 and 20, 1982 recorded in Franklin County Plat Book 288C, page 464.

Included within the above described real estate but specifically excluded therefrom are the following adverse conveyances:

- A. .30 acres conveyed by deed recorded in Franklin County Deed Book 881, page 82.
- B. 16.23 acres conveyed by deed recorded in Franklin County Deed Book 881, page 86.
- C. 15.803 acres conveyed by deed recorded in Franklin County Deed Book 878, page 228.

Tract No. 4, less the foregoing exclusions, contains 40.322 acres, more or less.



**COUNTY OF FRANKLIN
RECORDER OF DEEDS**
Linda Miller, Recorder
Courthouse 157 Lincoln Way East
Chambersburg, PA 17201
Phone: (717) 261-3872

* RETURN DOCUMENT TO:
TIMOTHY W MISNER
39 S BROAD STREET
WAYNESBORO, PA 17268

Instrument Number - 201706907
Recorded On 4/11/2017 At 1:33:20 PM

* Instrument Type - DEED
Invoice Number - 155138 User ID - JRH
* Grantor - HORST, IVAN D
* Grantee - HORST, IVAN D

* Total Pages - 10

* FEES

STATE WRIT TAX	\$0.50
STATE JCS/ACCESS TO JUSTICE	\$35.50
COUNTY RECORDING FEE	\$223.00
AFFORDABLE HOUSING	\$11.05
AFFORDABLE HOUSING	\$1.95
COUNTY IMPROVEMENT FEE	\$2.00
ROAD IMPROVEMENT FEE	\$3.00
CHAMBERSBURG AREA SCHOOL	\$0.00
DIST REAL TAX	
WAYNESBORO AREA SCHOOL	\$0.00
DIST REAL TAX	
GUILFORD TOWNSHIP	\$0.00
MONT ALTO BOROUGH	\$0.00
QUINCY TOWNSHIP	\$0.00
WASHINGTON TOWNSHIP	\$0.00
TOTAL PAID	\$277.00

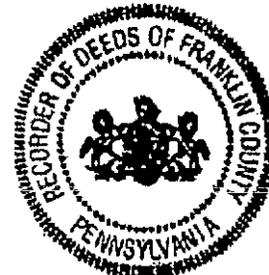
This is a certification page
DO NOT DETACH
This page is now part
of this legal document.

Franklin County UPI Verification
UPI Verified On April 11, 2017 By TDS

I hereby CERTIFY that this document is recorded in the Recorder of Deeds Office of Franklin County, Pennsylvania.

Linda Miller

Linda Miller
Recorder of Deeds



* - Information denoted by an asterisk may change during the verification process and may not be reflected on this page.

NO.	DATE	BY	DESCRIPTION
1	10/22/04
2
3
4
5
6
7
8
9
10

RECORDED
205 FEB 22 A 9-57
LUBA HOLLER
SHERIFF'S OFFICE

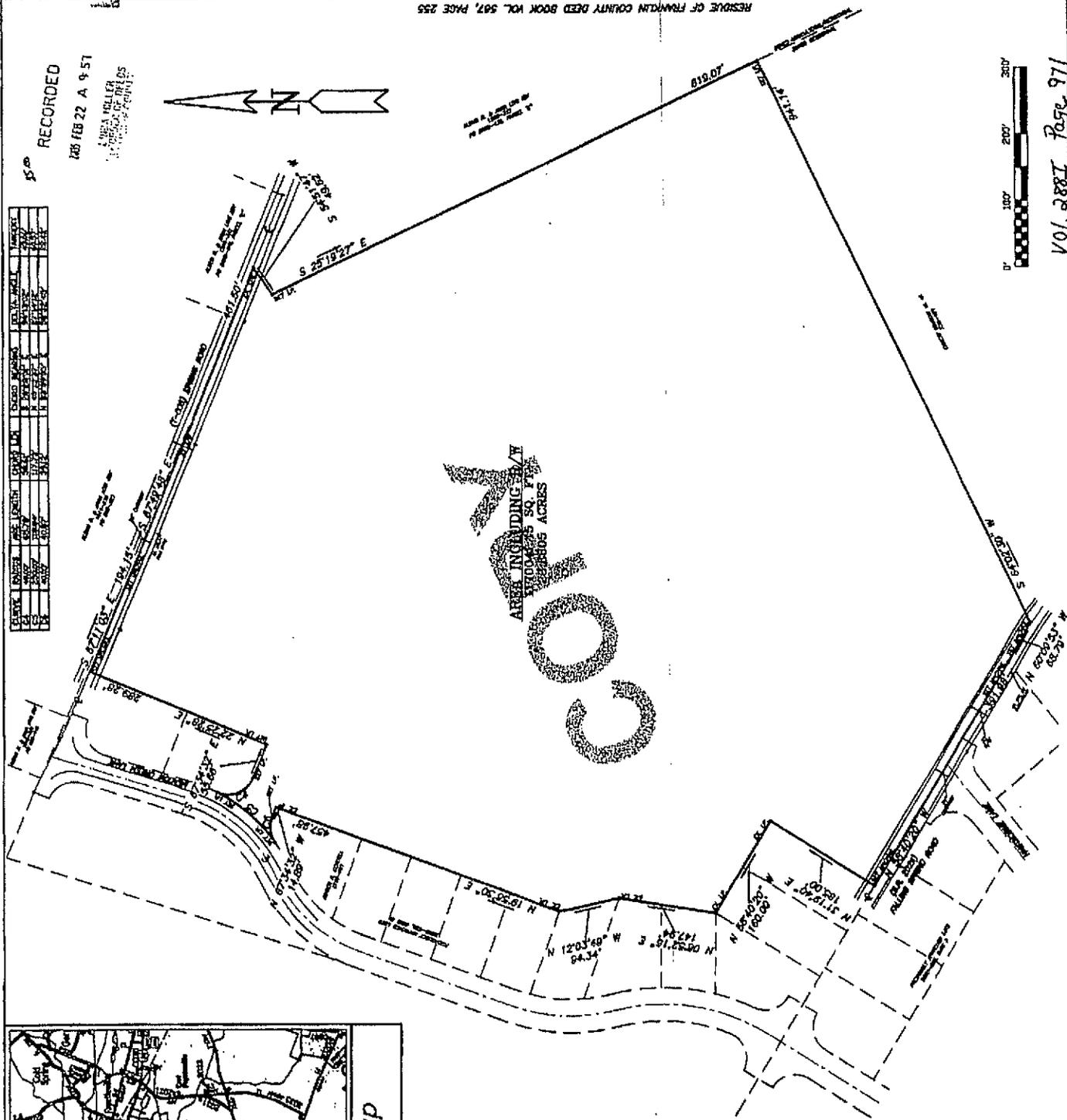
Curman & Zullinger
Surveying Inc.
Surveying & Subdivision & Staking out
650 Lincoln Way East
Charlestown, PA 17021
Phone (717-631-0768)
Fax (717-631-1705)

Scale	1" = 100'
Date	10/22/04
Drawn	RB
Checked	MJC
Approved	MJC
Per	PH-13

SURVEY OF LAND
FRANKLIN COUNTY, PENNSYLVANIA
GULFORD TOWNSHIP

MICO ENTERPRISES INC.
(OWNER/DEVELOPER)

RESERVE OF FRANKLIN COUNTY DEED BOOK VOL. 597, PAGE 255



Location Map
Scale 1" = 4000'

- Legend**
- Centerline
 - Right of Way
 - Flow or Formity
 - Existing
 - Mail
 - Mail & Weather
 - Railroad Spine
 - Point
 - Pin on Line
 - Ditch Hole
 - Curve Data Reference
 - Line Data Reference
 - Benchmark
 - Temporary Benchmark
 - Sanitary Sewer Main
 - Sewer Service Line
 - SS
 - CD
 - W
 - Water Service Line
 - Water Meter
 - Meter
 - Key Loop
 - Easement



Vol. 2887 Page 971

ATTACHMENT B

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED

2018 MAY 15 AM 11:39

PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Ivan D. & Ellen M. Horst in Washington Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/skr
Enclosures

Rosemary Chiavetta, Secretary
May 15, 2018
Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

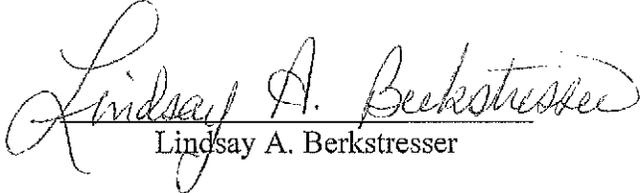
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Ivan D. & Ellen M. Horst
2732 Sollenberger Drive
Chambersburg, PA 17202

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Ivan D. Horst and Ellen M. Horst in :
Guilford and Washington Townships, Franklin :
County, Pennsylvania for the Siting and :
Construction of the 230 kV Transmission Line :
Associated with the **Independence Energy** :
Connection-West Project is Necessary or :
Proper for the Service, Accommodation, :
Convenience or Safety of the Public :
:

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Ivan D. Horst and Ellen M. Horst in Guilford and Washington Townships, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA's attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by Ivan D. Horst and Ellen M. Horst in Guilford and Washington Townships, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Ivan D. Horst and Ellen M. Horst property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Ivan D. Horst and Ellen M. Horst.

The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response,

Transource Energy, the parent of Transource PA, submitted "Project 9A." The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM's 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA's Maryland affiliate, Transource Maryland, LLC ("Transource MD"), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM's Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses tracts of land located at 3260 New Franklin Road, Chambersburg, Franklin County, Pennsylvania 17202 and Koons Road, Waynesboro, Franklin County, Pennsylvania 17268..

32. Deeds for the properties are recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Deed Book 3470, Page Number 5 and Instrument Number 201706907 and a copy of said recorded deed is attached hereto as Attachment A.

33. The names and mailing address of the owners of record of said tract of land are Ivan D. Horst and Ellen M. Horst, 2732 Sollenberger Drive, Chambersburg, Pennsylvania 17202.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the Ivan D. Horst and Ellen M. Horst property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. §

1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Ivan D. Horst and Ellen M. Horst and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Ivan D. Horst and Ellen M. Horst and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Ivan D. Horst and Ellen M. Horst, who is/are the record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

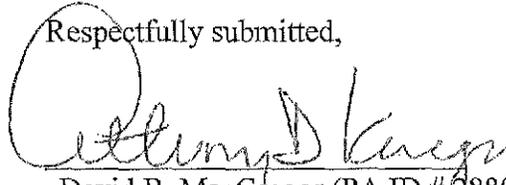
43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

Respectfully submitted,



Amanda Riggs Conner (District of Columbia ID # 481740)

Hector Garcia (VA ID # 48304)

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, OH 43215

Phone: 614-716-3410

Fax: 614-716-1613

E-mail: arconner@aep.com

E-mail: hgarcial@aep.com

David B. MacGregor (PA ID # 28804)

Anthony D Kanagy (PA ID # 85522)

Lindsay A. Berkstresser (PA ID # 318370)

Post & Schell, P.C.

17 North Second Street, 12th Floor

Harrisburg, PA 17101-1601

Phone: 717-731-1970

Fax: 717-731-1985

E-mail: dmacgregor@postschell.com

E-mail: akanagy@postschell.com

E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

11083
THIS DEED

MADE the 9th day of May
in the year two thousand seven (2007)

BETWEEN IVAN D. HORST and ELLEN M. HORST, husband and wife, of 2732
Sollenberger Drive, Chambersburg, Pennsylvania-----GRANTORS

and IVAN D. HORST and ELLEN M. HORST, husband and wife, of 2732 Sollenberger Drive,
Chambersburg, Pennsylvania, as tenants by the entireties-----GRANTEES

WITNESSETH, That in consideration of other good and valuable considerations and the
sum of Two (\$2.00)-----Dollars, in hand paid, the receipt whereof is hereby acknowledged, the
said grantors do hereby grant and convey to the said grantees, in fee simple, as tenants by the
entireties

ALL the following described two (2) tracts of real estate lying and being situate in
Guilford Township, Franklin County, Pennsylvania, bounded and described as follows:

TRACT NO. 1:

BEGINNING at a stone; thence by lands now or formerly of Christ C. Miller,
North 38 degrees East 56 perches to stones; thence by lands of same, North 58 3/4
degrees East 21.5 perches to stones; thence by Tract No. 2 herein, North 56
degrees West 28.8 perches to stones; thence by same, North 71 1/2 degrees West
60.2 perches to stones; thence by same and lands now or formerly of Roy College,
North 68 degrees West 20 perches to stones; thence by lands now or formerly of
Roland College, South 50 degrees West 49.2 perches to stones; thence by lands
now or formerly of Evelyn F. Miller, South 38 3/4 degrees East 26.5 perches to a
black oak; thence by lands now or formerly of David Martin, South 55 3/4 degrees
East 82 perches to the place of beginning. CONTAINING 42 acres and 115
perches, neat measure.

TRACT NO. 2:

BEGINNING at a stone; thence by lands now or formerly of John Sollenberger,
North 33 1/3 degrees West 97.4 perches to stones; thence by lands now or
formerly of Roland College and Roy College, South 50 1/4 degrees West 108.2
perches to a stone; thence by Tract No. 1 herein South 68 1/2 degrees East 12.05
perches to a stone; thence by same, South 71 1/2 degrees east 60.2 perches to
stones; thence by same, South 56 degrees East 28.8 perches to a stone; thence by
lands now or formerly of Christ C. Miller, North 58 3/4 degrees East 52 1/2
perches to the place of beginning. CONTAINING 44 acres and 103 perches, neat
measure.

LESS, HOWEVER, that 2 Lot subdivision out of Tract 1 as prepared by Survey and draft of Thomas Michael Englerth, R.S., dated August 31, 1981, and recorded in Franklin County Deed Book Volume 847 at page 231.

ALSO, LESS, HOWEVER, that tract of real estate out of Tract 1 conveyed by Stuart A. Walker and Kathryn L. Walker, husband and wife, by their deed dated September 21, 1978, and recorded in Franklin County Deed Book Volume 772 at page 66 to John H. Walker and Rhetta B. Walker.

BEING the same real estate conveyed to Ivan D. Horst and Ellen M. Horst, husband and wife, by deeds of I. Chester Horst and Martha M. Horst, husband and wife, dated December 31, 1998 and January 4, 1999 and recorded in Franklin County Deed Book 1412, page 126 and 1412, page 505.

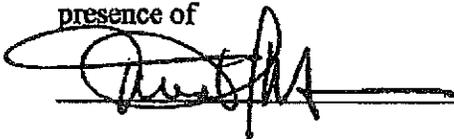
This transaction is exempt from Pennsylvania Transfer Tax being a conveyance between spouses.

SUBJECT, however, to all conditions, easements, restrictions and other matters legally affecting the same.

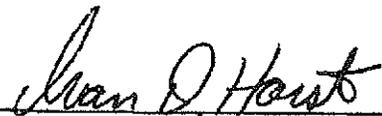
AND the said grantors will warrant specially the property hereby conveyed.

IN WITNESS WHEREOF, said grantors have executed this deed the day and year first above written.

Sealed and delivered in the presence of



(as to both)

 (SEAL)
Ivan D. Horst

 (SEAL)
Ellen M. Horst

COPY

71.50

LINDA MILLER
RECORDER OF DEEDS
FRANKLIN COUNTY

2007 MAY 10 A 10:43

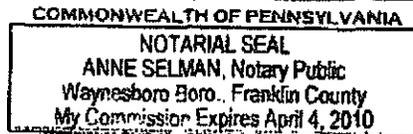
RECORDED

COMMONWEALTH OF PENNSYLVANIA :
:SS
COUNTY OF FRANKLIN :

On this, the 9th day of May, 2007, before me, a notary public, the undersigned officer, personally appeared Ivan D. Horst and Ellen M. Horst, known to me (or satisfactorily proven) to be the persons whose names are subscribed to the within instrument, and acknowledged that they executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

Anne Selman
Notary Public
My Commission expires _____



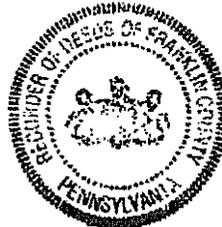
CERTIFICATE OF RESIDENCE

I hereby certify that the precise residence of the grantees herein is 2732 Sollenberger Drive, Chambersburg, PA 17201.

Witness my hand this 9th day of May, 2007.

[Signature]
On behalf of Grantees

I hereby CERTIFY that this document is recorded in the Recorder's Office of Franklin County, Pennsylvania



Linda Miller
Linda Miller
Recorder of Deeds

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.



EXHIBIT A
 Owner:
 HORST IVAN D
 Franklin PA
 Parcel ID: 1057.00
 Rice to Ringgold



-  Centerline
-  Parcel Within ROW
-  Parcels
-  ROW Approximately 130'

Source: ESRI and Burns & McDonnell Engineering.

Issue: April, 23 2018

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

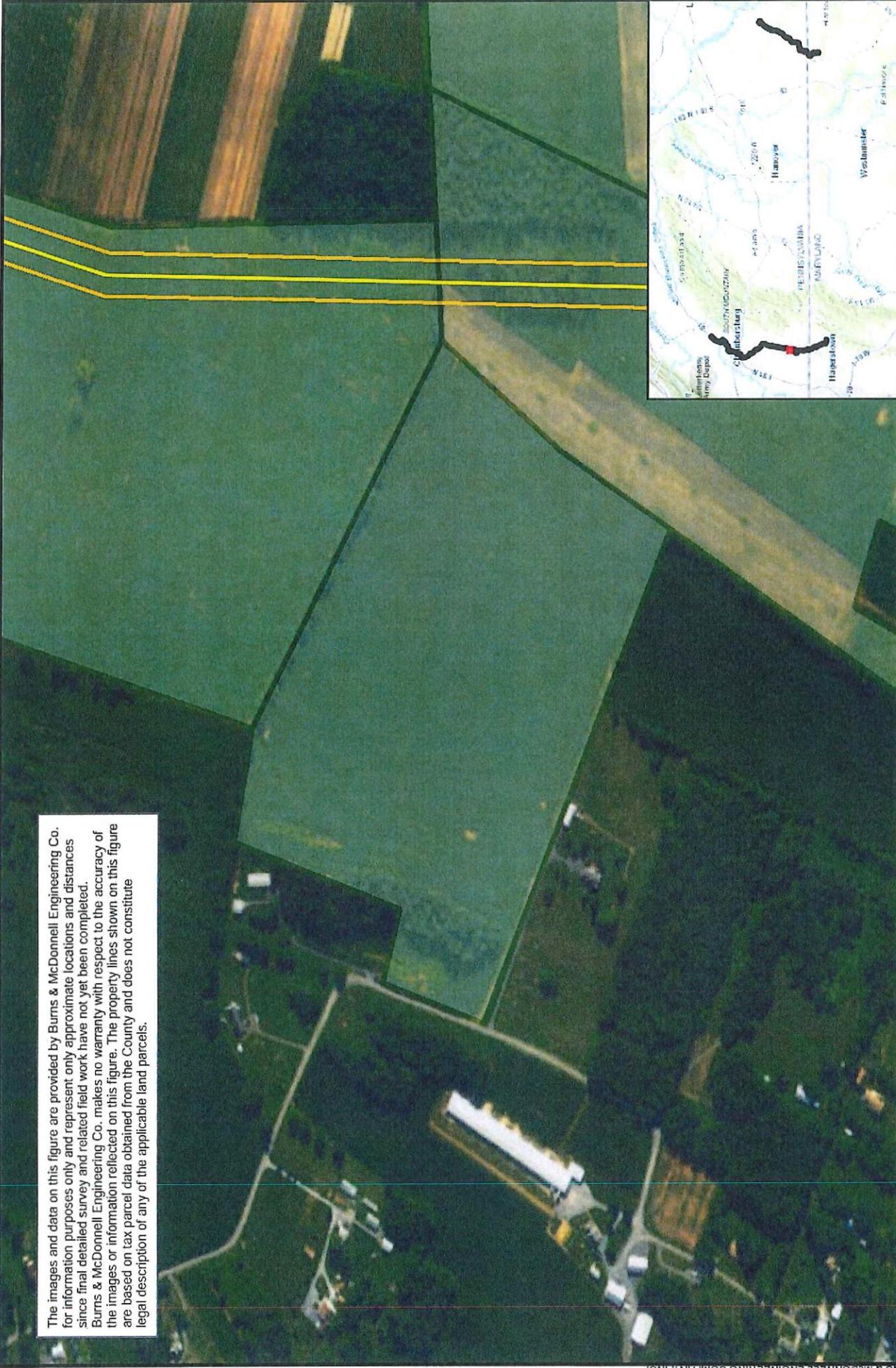


EXHIBIT A
 Owner:
 HORST IVAN D
 Franklin PA
 Parcel ID: 1106.00
 Rice to Ringgold



-  Centerline
-  Parcel Within ROW
-  Parcels
-  ROW Approximately 130'

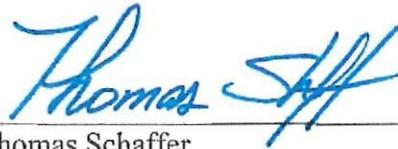
Source: ESRI and Burns & McDonnell Engineering.

Issued: April, 23 2018

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED
2018 MAY 15 AM 11:25
PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

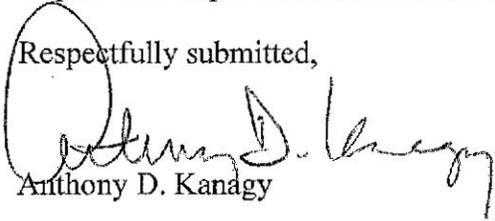
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Leonard H. Kauffman and Mary P. Kauffman in Greene Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,


Anthony D. Kanagy

ADK/jl
Enclosures

Rosemary Chiavetta, Secretary
May 15, 2018
Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

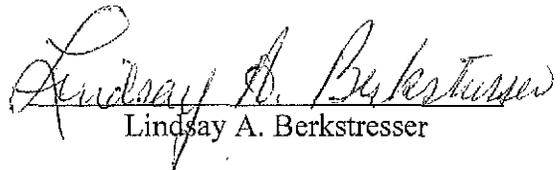
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Leonard H. Kauffman
Mary P. Kauffman
4297 Olde Scotland Road
Shippensburg, PA 17257

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Leonard H. Kauffman and Mary P. :
Kauffman in Greene Township, Franklin :
County, Pennsylvania for the Siting and :
Construction of the 230 kV Transmission Line :
Associated with the **Independence Energy** :
Connection-West Project is Necessary or :
Proper for the Service, Accommodation, :
Convenience or Safety of the Public :
:

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Leonard H. Kauffman and Mary P. Kauffman in Greene Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA's attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant to 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the lands owned by Leonard H. Kauffman and Mary P. Kauffman in Greene Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Leonard H. Kauffman and Mary P. Kauffman properties for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Leonard H. Kauffman and Mary P. Kauffman. The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission

congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response, Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA’s Maryland affiliate, Transource Maryland, LLC (“Transource MD”), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM’s Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and

Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the

public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at Olde Scotland Road, Chambersburg, Franklin County, Pennsylvania 17202 (Olde Scotland Road Property) and a tract of land located at 4220 Olde Scotland Road, Chambersburg, Franklin County, Pennsylvania 17202 (4220 Olde Scotland Road Property).

32. Deeds for the properties are recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Deed Book 1228, Page 91 (Olde Scotland Road property) and Deed Book 1333, Page 0252 (4220 Olde Scotland Road property) and a copy of said recorded deeds are attached hereto as Attachment A.

33. The names and mailing address of the owners of record of said tracts of land are Leonard H. Kauffman and Mary P. Kauffinan, 4297 Olde Scotland Road, Shippensburg, Pennsylvania 17257.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. Maps depicting the proposed right-of-ways across the Leonard H. Kauffman and Mary P. Kauffman properties are attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tracts of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Leonard H. Kauffman and Mary P. Kauffman and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Leonard H. Kauffman and Mary P. Kauffman and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. **CONSOLIDATION OF RELATED PROCEEDINGS**

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Leonard H. Kauffman and Mary P. Kauffman, who is/are the record owner(s) of the properties that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-

2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Respectfully submitted,

Amanda Riggs Conner (District of Columbia ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com


David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

ATTACHMENT A

408413

THIS DEED

MADE the 11th day of August in the year nineteen hundred and ninety-four (1994)

BETWEEN HOWARD H. KAUFFMAN and BERNICE R. KAUFFMAN, his wife,
of Greene Township, Franklin County, Pennsylvania,

GRANTORS

AND LEONARD H. KAUFFMAN and MARY P. KAUFFMAN, his wife,
of 4297 Olde Scotland Road, Chambersburg, Pennsylvania,
17201.

GRANTORS

WITNESSETH that in consideration of ONE (\$1.00) DOLLAR and other good and valuable consideration, in hand paid, the receipt whereof is hereby acknowledged, the said Grantors do hereby grant and convey in fee simple to said Grantees

ALL the following described real estate lying and being situate in Greene Township, Franklin County, Pennsylvania, bounded and described as follows:

TRACT NO. 1:
BEGINNING at a stone in the Scotland and Shippensburg Road; thence along said road and other lands of Howard H. Kauffman, South 38 1/4 degrees West 4.9 perches to a point in said road; thence along lands now or formerly of Robert T. Kauffman, North 51 1/4 degrees West 49.9 perches to a stone in private road; thence in said private road and by lands now or formerly of Allen and Peters, North 48 1/2 degrees East 26.6 perches to a stone in said private road; thence by the same, South 84 degrees East 12 perches to a stone; thence by the same and land now or formerly of Leroy Diller, North 85 3/4 degrees East 18.3 perches to a stone at North side of lane; thence along said lane and lands now or formerly of Leroy Diller, South 54 degrees East 19.2 perches to a stone on North side of said lane; thence by the same, South 43 3/4 degrees East 12.8 perches to a stone in the Scotland and Shippensburg Road; thence along said last-named road and other lands of Howard H. Kauffman, South 59 degrees West 43.7 perches to a stone in the middle of said road, the place of BEGINNING. CONTAINING 13 acres more or less.

BEING THE SAME real estate which Robert T. Kauffman, single, by his deed dated March 18, 1959, and recorded among the deed records of Franklin County, Pennsylvania, in Deed Book Volume 500, Page 628, conveyed to Howard H. Kauffman, w/o, joined by his wife, Bernice R. Kauffman, are the Grantors herein.

TRACT NO. 2:

BEGINNING at a point in the centerline of public road, Route 696, being Scotland to Shippensburg Road, at corner of other lands of Howard H. Kauffman; thence in the centerline of said public road, South 38 1/4 degrees West 39 perches to a stone in the middle of said road; thence along lands formerly of William B. Shields, now or formerly of Harry Peters, North 51 3/4 degrees West 56.8 perches to a stone in a private road on line of land formerly of J. H. Kearns, now or formerly Leroy Diller and Vivian Diller, his wife; thence by the latter, North 99 1/2 degrees East 35.2 perches to a stone in said private road; thence by the same, South 81 1/4 degrees East 12.5 perches to a stone in said private road; thence along other lands of Howard H. Kauffman, South 51 3/4 degrees East 49.9 perches to a point in the public road, Route 696, being the Scotland to Shippensburg Road, the place of **BEGINNING**. CONTAINING 13 acres and 82 perches more or less.

SUBJECT TO such road rights as they now exist.

BEING THE SAME which Robert F. Kauffman, single, by his deed dated March 18, 1964, and recorded among the deed records of Franklin County, Pennsylvania, in Deed Book Volume 580, Page 135, conveyed to Howard H. Kauffman, who, joined by his wife, Bernice R. Kauffman, are the Grantors herein.

TRACT NO. 3:

BEGINNING at an iron pin in the right-of-way line of Interstate Route 81 (Legislative Route 799) at a corner common to the within described real estate and the right-of-way of the Pennsylvania Department of Transportation as shown on the draft of survey hereinafter referred to; thence along the required right-of-way line of the aforementioned public road, North 20 degrees 40 minutes 36 seconds East 100 feet to an iron pin in said right-of-way line; thence continuing along said right-of-way line, North 25 degrees 49 minutes 10 seconds East 29.05 feet to an iron pin at corner common to the within described tract and lands now or formerly of Howard H. Kauffman; thence along lands of Kauffman, South 51 degrees 56 minutes 07 seconds East 105 feet to an iron pin on the existing right-of-way line of Legislative Route 28009; thence continuing along lands now or formerly of Kauffman, South 51 degrees 56 minutes 07 seconds East, 25 feet to a railroad spike in the centerline of Legislative Route 28009; thence in said centerline, South 39 degrees 11 minutes 56 seconds West 105 feet to a railroad spike in said centerline; thence along right-of-way of the Pennsylvania Department of Transportation, North 50 degrees 48 minutes 04 seconds West 25 feet to an iron pin in the existing right-of-way line of Legislative Route 28009; thence along lands of the Pennsylvania Department of Transportation, North 68 degrees 03 minutes 19 seconds West 69.62 feet to an iron

pin, the place of BEGINNING. CONTAINING .292 acres, more or less and being the tract of real estate shown on a certain draft of survey prepared for Howard H. Kauffman and Bernice E. Kauffman, his wife, by Arrowood, Incorporated, dated September 13, 1978 and recorded in Franklin County Deed Book Volume 775, Page 371.

BEING THE SAME real estate which Harry A. Peters and Margaret R. Peters, his wife, by their deed dated November 3, 1978, and recorded among the deed records of Franklin County, Pennsylvania, in Deed Book Volume 775, Page 369, conveyed to Howard H. Kauffman and Bernice R. Kauffman, his wife, Grantors herein.

Included in the description of Tract Nos. 1 and 2 above, but expressly excluded from this deed of conveyance, is all of that certain tract of real estate taken and condemned for construction of U. S. Route 81.

THIS IS A TAX EXEMPT TRANSFER BETWEEN PARENTS AND SON AND DAUGHTER-IN-LAW.

AND the said Grantors will warrant specially the property hereby conveyed.

IN WITNESS WHEREOF said Grantors hereunto set their hands and seals, the day and year first above written.

Witness:

Linda N. Dickinson

Howard H. Kauffman (SEAL)
Howard H. Kauffman

Linda N. Dickinson

Bernice R. Kauffman (SEAL)
Bernice R. Kauffman

I hereby CERTIFY that this document is recorded in the Recorder's Office of Franklin County, Pennsylvania.



David W. Bowers

David W. Bowers
Recorder of Deeds

ACKNOWLEDGMENT

COMMONWEALTH OF PENNSYLVANIA :

COUNTY OF FRANKLIN :

On this 11th day of August, 1994, before me, a Notary Public, the undersigned officer, personally appeared HOWARD H. KAUFFMAN and BERNICE R. KAUFFMAN, his wife, known to me (or satisfactorily proven), to be the persons whose names are subscribed to the within instrument, and acknowledged the foregoing deed to be their act and deed, and desired the same to be recorded as such.

Witness my hand and official seal, the day and year aforesaid.

Evelyn J. Shreiner

My Commission expires _____

I maintain an office in _____

NOTARIAL SEAL
EVELYN J. SHREINER, Notary Public
Barony of Chambersburg, Franklin Co.
My Commission Expires Feb. 11, 1997



COPY

I hereby certify that the Grantees' precise residence and complete post office address is:

4297 Olde Scotland Road

Chambersburg, PA 17201

Witness my hand this 11th day of August, 1994.

Linda N. Decker

RECORDED
1994 AUG 15 P 2 48
FRANKLIN COUNTY
OFFICE OF DEEDS
131

COMMONWEALTH OF PENNSYLVANIA :

COUNTY OF FRANKLIN :

RECORDED in the Office for Recording of Deeds in and for the said County in Deed Book _____, Page _____.

WITNESS my hand and seal of office, this _____ day of _____, Anno Domini, 1994.

22846
THIS DEED

MADE the 17th day of APRIL in the year nineteen hundred and ninety-seven (1997)

BETWEEN: HOWARD HARVEY KAUFFMAN and BERNICE R. KAUFFMAN, his wife, of 4220 Old Scotland Road, Chambersburg, Franklin County, Pennsylvania,

GRANTORS

AND: LEONARD H. KAUFFMAN of 4297 Old Scotland Road, Chambersburg, Pennsylvania, 17201,

GRANTEE

LINDA HILLER
RECORDER OF DEEDS
FRANKLIN COUNTY

13.50
APR 24 9 45 AM '97
RECORDED

WITNESSETH that in consideration of ONE (\$1.00) DOLLAR, in hand paid, the receipt whereof is hereby acknowledged, the said Grantors do hereby grant and convey in fee simple to said Grantee

ALL that certain message or tract of land lying and being situate in Greene Township, Franklin County, Pennsylvania, bounded and limited as follows:

BEGINNING at a corner with lands now or formerly of Fred Lehman and Mrs. Maria Ryder; thence by lands now or formerly of said Lehman, North 52 degrees West, 80.9 perches to the middle of the public road leading from Fayetteville to Shippensburg; thence along the middle of said road, North 38 1/4 degrees East, 44 perches to a stone; thence along the same, North 59 degrees East, 71 perches to a stone; thence along the middle of a private road between the message herein conveyed and land now or formerly of Philip Ott, South 79 1/2 degrees East, 63 perches; thence by lands now or formerly of Maria Ryder, South 37 1/2 degrees West, 139 and 3/10 perches, to the place of BEGINNING. CONTAINING 55 Acres 94 perches, neat measure.

BEING THE SAME REAL ESTATE which Murray Archie Kauffman and Margaret H. Kauffman, his wife; Robert Terry Kauffman, single; Alice Herthal Titz and Charles Titz, her husband; Easton Rhea Kauffman and Alma S. Kauffman, his wife; and Howard Harvey Kauffman and Bernice R. Kauffman, his wife, by Deed dated February 12, 1953, and recorded among the Deed Records of Franklin County, Pennsylvania, in Deed Book Volume 437, Page 708, conveyed to Howard Harvey Kauffman and Bernice R. Kauffman, Grantors herein.

THIS IS A TRANSFER BETWEEN PARENTS AND SON AND THEREFORE
FREE OF PENNSYLVANIA REALTY TRANSFER TAX.

AND the said Grantors will warrant specially the property hereby conveyed.

IN WITNESS WHEREOF said Grantors hereunto set their hands and seals, the
day and year first above written.

Witness:

Howard H. Kauffman (SEAL)
Howard H. Kauffman

Bernice R. Kauffman (SEAL)
Bernice R. Kauffman

ACKNOWLEDGEMENT

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF FRANKLIN

On this 19th day of APRIL, 1997, before me, a Notary
Public, the undersigned officer, personally appeared HOWARD H. KAUFFMAN
and BERNICE R. KAUFFMAN, his wife, known to me (or satisfactorily proven) to
be the persons whose names are subscribed to the within instrument, and
acknowledged the foregoing deed to be their and deed, and desired the same to
be recorded as such.

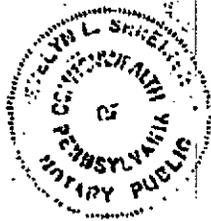
Witness my hand and official seal, the day and year aforesaid.

Erwin L. Shriver

My Commission expires

I maintain an office in

NOTARIAL SEAL
Erwin L. Shriver, Notary Public
Boro of Chambersburg, Franklin Co
My Commission Expires Feb. 11, 2001



I hereby certify that the Grantors' precise residence and complete post office address is:

4397 Old Southside Road
Chambersburg, PA 17201

Witness my hand this _____ day of _____, 1997.

James H. Kauffman

COPY

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF FRANKLIN

RECORDED in the Office for Recording of Deeds in and for the said County in
Deed Book _____, Page _____.

WITNESS my hand and seal of office, this _____ day of _____
_____, Anno Domini, 1997.

I hereby CERTIFY that this document is
recorded in the Recorder's Office of
Franklin County, Pennsylvania.



Linda Miller
Linda Miller
Recorder of Deeds

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

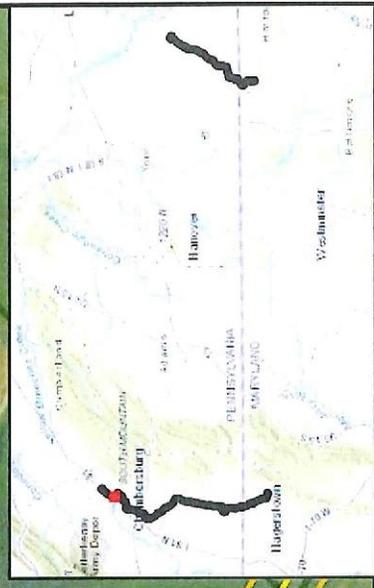
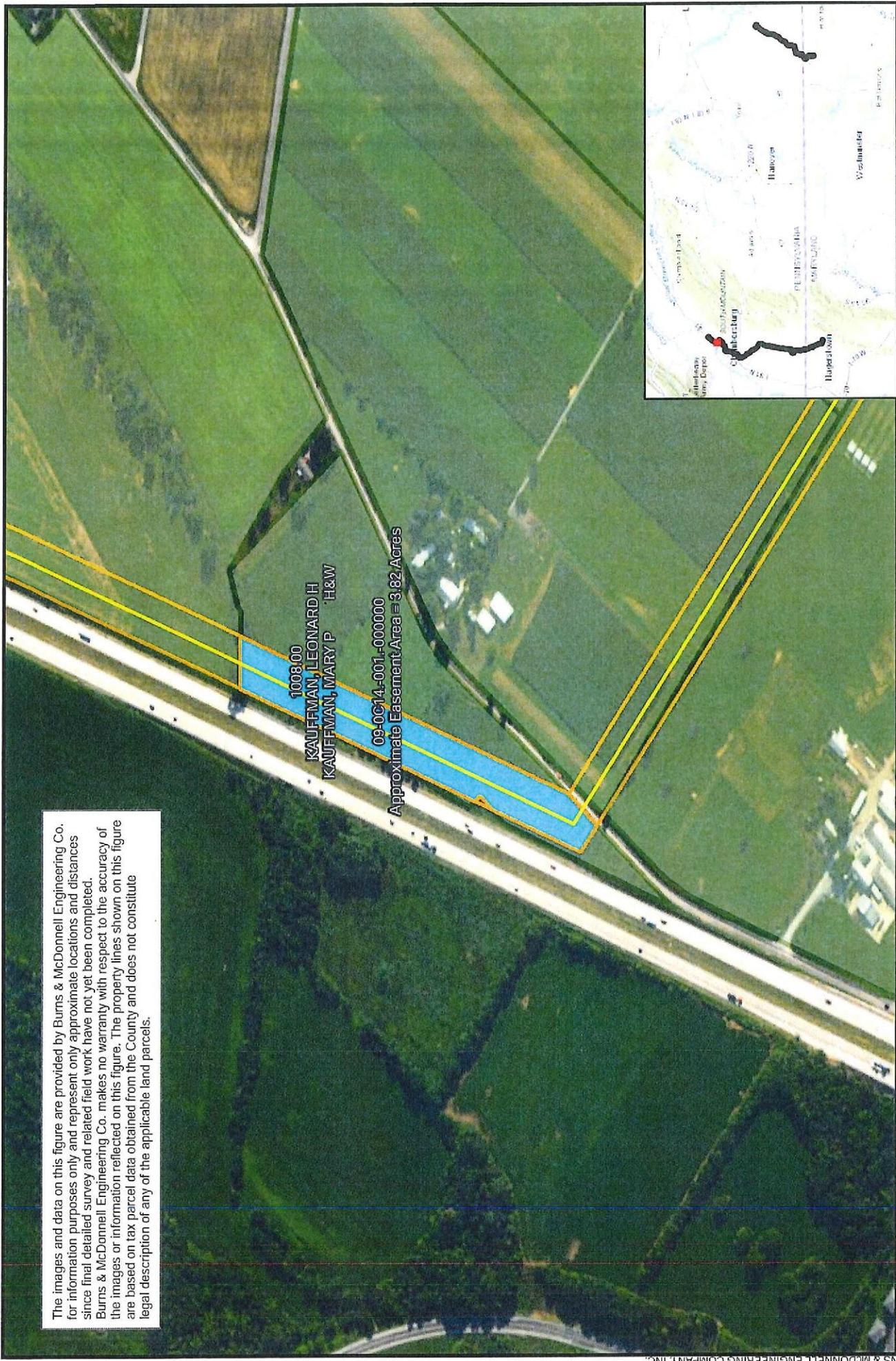
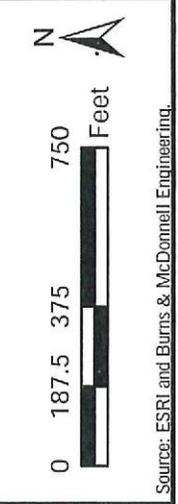


EXHIBIT A
 Owner:
 KAUFFMAN, LEONARD H
 Franklin PA
 Parcel ID: 1008.00
 Rice to Ringgold



- Centerline
- Parcel Within ROW
- Parcels
- ROW Approximately 130'

Source: ESRI and Burns & McDonnell Engineering.

Issued: April, 23 2018

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

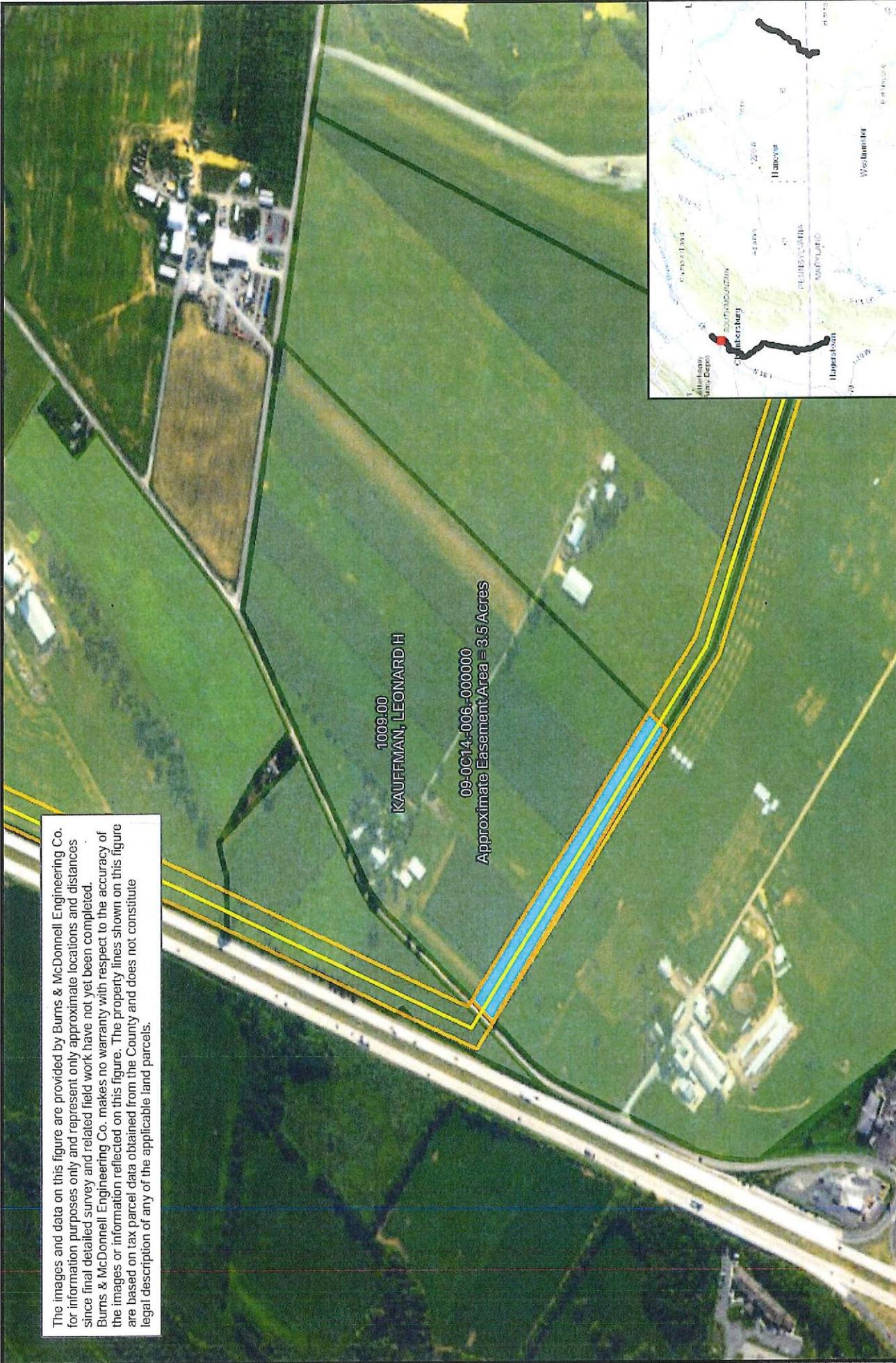


EXHIBIT A

Owner:
KAUFFMAN, LEONARD H
 Franklin PA
 Parcel ID: 1009.00
 Rice to Ringgold



- Centerline
- Parcel Within ROW
- Parcels
- ROW Approximately 130'

Source: ESRI and Burns & McDonnell Engineering.

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED
2018 MAY 15 AM 11:33
PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Wayne E. Lehman & Donald R. Lehman as Trustees of the Credit Shelter Trust established under Item II of the Last Will of Harvey M. Lehman (the "Harvey M. Lehman Credit Shelter Trust") and Wayne E. Lehman, Donald R. Lehman, Jane L. Martin, Kenneth L. Lehman and Lester E. Lehman in Greene Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/sme
Enclosures

ALLENTOWN HARRISBURG LANCASTER PHILADELPHIA PITTSBURGH PRINCETON WASHINGTON, D.C.

A PENNSYLVANIA PROFESSIONAL CORPORATION

Rosemary Chiavetta, Secretary
May 15, 2018
Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Harvey M. Lehman
Credit Shelter Trust
7518 Friendship Village Road
Chambersburg, PA 17202

Wayne E. Lehman
7518 Friendship Village Road
Chambersburg, PA 17202

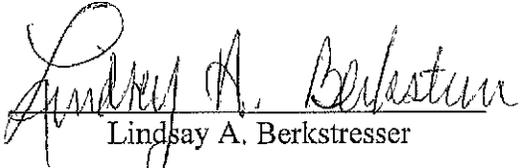
Donald R. Lehman
1865 Buchanan Trail East
Greencastle, PA 17225

Jane L. Martin
12989 Mt. Pleasant Road
Mercersburg, PA 17236

Kenneth L. Lehman
1592 Fairview Avenue
Chambersburg, PA 17202

Lester E. Lehman
4427 Rumler Road
Chambersburg, PA 17202

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Wayne E. Lehman & Donald R. :
Lehman as Trustees of the Credit Shelter Trust :
established under Item II of the Last Will of :
Harvey M. Lehman (the “Harvey M. Lehman :
Credit Shelter Trust”) and Wayne E. Lehman, :
Donald R. Lehman, Jane L. Martin, Kenneth L. :
Lehman and Lester E. Lehman in Greene :
Township, Franklin County, Pennsylvania for :
the Siting and Construction of the 230 kV :
Transmission Line Associated with the
**Independence Energy Connection-West
Project** is Necessary or Proper for the Service,
Accommodation, Convenience or Safety of the
Public

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of the Harvey M. Lehman Credit Shelter Trust, and Wayne E. Lehman, Donald R. Lehman, Jane L. Martin, Kenneth L. Lehman and Lester E. Lehman in Greene Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West

Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA’s address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA’s attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

Transource PA’s attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC (“Transource Energy”).

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by Harvey M. Lehman Credit Shelter Trust, and Wayne E. Lehman, Donald R. Lehman, Jane L. Martin, Kenneth L. Lehman and Lester E. Lehman in Greene Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Harvey M. Lehman Credit Shelter Trust, and Wayne E. Lehman, Donald R. Lehman, Jane L.

Martin, Kenneth L. Lehman and Lester E. Lehman property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Harvey M. Lehman Credit Shelter Trust, and Wayne E. Lehman, Donald R. Lehman, Jane L. Martin, Kenneth L. Lehman and Lester E. Lehman. The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities

that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response, Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA’s Maryland affiliate, Transource Maryland, LLC (“Transource MD”), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM’s Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the

human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at 686 Mower Road, Chambersburg, Franklin County, Pennsylvania 17202.

32. A deed for the property is recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania at Instrument Number 2008023830 and Instrument Numbers 200904069 and a copy of said recorded deeds are attached hereto as Attachment A.

33. The names and mailing addresses of the owners of record of said tract of land are: Harvey M. Lehman Credit Shelter Trust, 7518 Friendship Village Road, Chambersburg, Pennsylvania, 17202; Wayne E. Lehman, 7518 Friendship Village Road, Chambersburg, Pennsylvania 17202; Donald R. Lehman, 1865 Buchanan Trail East, Greencastle, Pennsylvania 17225; Jane L. Martin, 12989 Mt. Pleasant Road, Mercersburg, Pennsylvania 17236; Kenneth L. Lehman, 1592 Fairview Avenue, Chambersburg, Pennsylvania 17202; and Lester E. Lehman, 4427 Rumler Road, Chambersburg, Pennsylvania 17202.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and

constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the Harvey M. Lehman Credit Shelter Trust, and Wayne E. Lehman, Donald R. Lehman, Jane L. Martin, Kenneth L. Lehman and Lester E. Lehman property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through Transource PA’s proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Harvey M. Lehman Credit Shelter Trust, and Wayne E. Lehman, Donald R. Lehman, Jane L. Martin, Kenneth L. Lehman and Lester E. Lehman and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Harvey M. Lehman Credit Shelter Trust, and Wayne E. Lehman, Donald R. Lehman, Jane L.

Martin, Kenneth L. Lehman and Lester E. Lehman and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. *Issues relating to the necessity for IEC-West Project are interrelated with this Application.*

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Harvey M. Lehman Credit Shelter Trust, and Wayne E. Lehman, Donald R. Lehman, Jane L. Martin, Kenneth L. Lehman and Lester E. Lehman, who are the record owners of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. *Issues relating to the need for these condemnations are interrelated with this Application.*

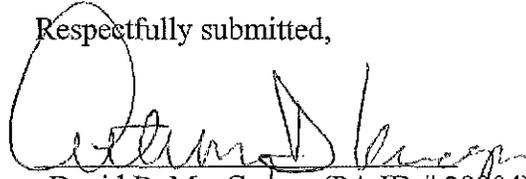
43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

Respectfully submitted,



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Hector Garcia (VA ID # 48304)
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Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

DEED

THIS DEED, made as of the 16 day of December, 2008, by and among Wayne E. Lehman, 7518 Friendship Village Road, Chambersburg, PA 17202, and Donald R. Lehman, 1865 Buchanan Trail East, Shady Grove, PA 17256, as Co-Executors of the Estate of Harvey M. Lehman, deceased, late of Greene Township, Franklin County, Pennsylvania, GRANTORS, and Wayne E. Lehman, 7518 Friendship Village Road, Chambersburg, PA 17202, and Donald R. Lehman, 1865 Buchanan Trail East, Shady Grove, PA 17256, as Trustees of the Credit Shelter Trust established under ITEM II of the Last Will of Harvey M. Lehman (hereinafter referred to as the "Harvey M. Lehman Credit Shelter Trust"), GRANTEES.

WHEREAS, Harvey M. Lehman, a resident of Greene Township, Franklin County, Pennsylvania, died testate on July 23, 2008, at his domicile located at 232 Village Square, Chambersburg, PA 17201, leaving a Last Will dated November 29, 2005, which was duly admitted to probate on August 5, 2008, (PA File No. 28-08-0419, File No. 2008-57612) and recorded among the Will Records of Franklin County, Pennsylvania, and by said Last Will he appointed Vera M. Lehman, his surviving spouse, as Executrix of his Last Will, and he appointed his sons Wayne E. Lehman and Donald R. Lehman as alternate Co-Executors of his Last Will;

WHEREAS, Vera M. Lehman renounced her right to have issued to her Letters Testamentary on the Estate of Harvey M. Lehman, in favor of Wayne E. Lehman and Donald R. Lehman as alternate Co-Executors of his Last Will, by way of her Renunciation dated August 5, 2008, and filed on even date with the Register of Wills in and for Franklin County, Pennsylvania;

WHEREAS, Letters Testamentary on the Estate of Harvey M. Lehman were duly granted by the Register of Wills of Franklin County, Pennsylvania, to said Wayne E. Lehman and Donald R. Lehman as Co-Executors;

WHEREAS, pursuant to ITEM VIII of the Last Will of decedent, Wayne E. Lehman and Donald R. Lehman are named and appointed as Co-Trustees of the Harvey M. Lehman Credit Shelter Trust;

WHEREAS, pursuant to the provisions of the Harvey M. Lehman Credit Shelter Trust, Wayne E. Lehman and Donald R. Lehman as Co-Executors, are directed to select and distribute to the Harvey M. Lehman Credit Shelter Trust, the cash, securities and other property that shall constitute the credit shelter trust, which assets shall be held IN TRUST and distributed by the Co-Trustees in accordance with the terms and conditions of the Harvey M. Lehman Credit Shelter Trust;

WHEREAS, the Harvey M. Lehman Credit Shelter Trust provides that during the

lifetime of Vera M. Lehman, the Co-Trustees shall pay and distribute to her for her benefit the entire net income therefrom, which payments shall be made to her periodically, but not less frequently than quarterly, and in addition, Vera M. Lehman shall have the non-cumulative right to direct the Co-Trustees to distribute to her annually, the greater of Five Thousand (\$5,000.00) and 00/100 Dollars, or five (5%) percent of the principal of the credit shelter trust, valued at the end of the calendar year in which the distribution is made, for her proper maintenance and support, provided, however, that this right shall be exercised only in writing, intended to take effect only during her lifetime, signed by her and delivered to the Co-Trustees;

WHEREAS, the Harvey M. Lehman Credit Shelter Trust further provides that upon the death of Vera M. Lehman, the Co-Trustees shall pay and distribute the principal to Wayne E. Lehman, Donald R. Lehman, Jane L. Martin, Kenneth L. Lehman, and Lester E. Lehman, being all the surviving children of decedent, in equal shares;

WHEREAS, decedent at his death owned an undivided one-half interest in the within described real estate, as tenant in common with his said wife, Vera M. Lehman;

WHEREAS, Vera M. Lehman presently owns an undivided one-half interest in the within described real estate, as tenant in common;

WHEREAS, Wayne E. Lehman and Donald R. Lehman as Co-Executors, have selected the undivided one-half interest in within described real estate owned by decedent at his death as tenant in common, for distribution to the Co-Trustees of the Harvey M. Lehman Credit Shelter Trust, to be held IN TRUST and to be distributed by the Co-Trustees in accordance with the terms and conditions of the Harvey M. Lehman Credit Shelter Trust;

WITNESSETH, that in accordance with the terms and conditions of the Harvey M. Lehman Credit Shelter Trust, said Grantors as Co-Executors do hereby grant and convey, in fee simple, to the said Grantees herein, as Co-Trustees of the Harvey M. Lehman Credit Shelter Trust, IN TRUST, the undivided one-half interest owned by decedent at his death as tenant in common in,

ALL the following described two tracts of real estate lying and being situate in Greene Township, Franklin County, Pennsylvania, bounded and described as follows:

TRACT No. 1:

BEGINNING at a post at corner of private road, Tract No. 2 herein; thence by land formerly of Walter Oyler, now or formerly of Nichol's and lands formerly of Jere Dull, now or formerly Mrs. Nelson Horn; North 86 degrees East 140 perches to a stone, formerly a white oak; thence by land formerly of Fisher now or formerly Small, and lands formerly of Isabelle B. McLanagan, now or formerly Frey across a private road

North 10 degrees East, 95 perches to a post; thence by land formerly of McLanagan now or formerly Frey North 66-1/2 degrees West 111-1/2 perches to a post; thence by land formerly of Rife now or formerly White and lands now or formerly of Leon H. Mower, South 32-3/4 degrees West 42.9 perches to a post; thence by land now or formerly of said Mower South 15 degrees West 116-1/2 perches to a post, the place of BEGINNING. CONTAINING 100 acres and 14 perches.

TRACT No. 2:

BEGINNING at a stone in the private road at lands formerly of Oyler now or formerly of Nichol's; thence across said private road North 15-1/8 degrees East 18 feet 4 inches to a stone; thence by land formerly of Jeremiah F. Ashway Estate now or formerly of Leon H. Mower South 85-3/4 degrees West 59.95 perches to a stone in public road ; thence in said public road South 5 degees West 18 feet to a stone in said public road at lands formerly Thomas Miller now or formerly Ebersole thence by land now or formerly of said Ebersole and Nichol's, North 85-3/4 degrees East 59.75 perches to a stone, the place of BEGINNING. CONTAINING 65.2 perches, as shown by draft of S. V. Wingert, C.S. , dated November 15, 1904.

TOGETHER WITH AND SUBJECT to all easements, reservations, set-back and other restrictions, rights-of-way, and conditions of record.

Being the same real estate which Harvey M. Lehman and Vera M. Lehman, husband and wife, by deed dated January 17, 2006, and recorded in Franklin County Record Book Volume 3031, Page 173, conveyed to Harvey M. Lehman and Vera M. Lehman, husband and wife, as tenants in common, each owning an undivided one-half interest.

This conveyance is exempt from the realty transfer tax pursuant to 72 P.S. Section 8102-C.3, being a conveyance to a trust for the benefit of decedent's surviving spouse, Vera M. Lehman, and herself and her sons Wayne E. Lehman and Donald R. Lehman, as Trustees of the Harvey M. Lehman Credit Shelter Trust;

AND the said Wayne E. Lehman and Donald R. Lehman as Co-Executors aforesaid, for themselves, their heirs, executors, administrators, successors and assigns, do hereby covenant, promise and agree to themselves, Wayne E. Lehman and Donald R. Lehman as Co-Trustees of the Harvey M. Lehman Credit Shelter Trust, their heirs, executors, administrators and assigns, that they have not done, committed or knowingly or willingly suffered to be done or committed any act, matter or thing, whatsoever, whereby the premises hereby granted and conveyed, or any part thereof, is, are, shall or may be encumbered in title, charge, estate or otherwise, howsoever.

IN WITNESS WHEREOF, said Grantors have hereunto set their hand and seal the day, month and year first above written.

Witness:

Joseph Macaluso

Wayne E. Lehman (SEAL)
Wayne E. Lehman, Co-Executor of
the Estate of Harvey M. Lehman

Joseph Macaluso

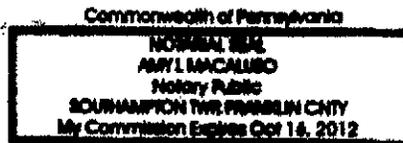
Donald R. Lehman (SEAL)
Donald R. Lehman, Co-Executor of
the Estate of Harvey M. Lehman

ACKNOWLEDGMENT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF FRANKLIN SS.

On this 16th day of December, 2008, before me, the undersigned officer, personally appeared Wayne E. Lehman and Donald R. Lehman, Co-Executors of the Estate of Harvey M. Lehman, deceased, known to me (or satisfactorily proven), to be the persons whose names are subscribed to the within instrument, and acknowledged that they executed same in the capacity therein stated and for the purposes therein contained. In witness whereof I hereunto set my hand and official seal.

Amy L. Macaluso
Notary Public

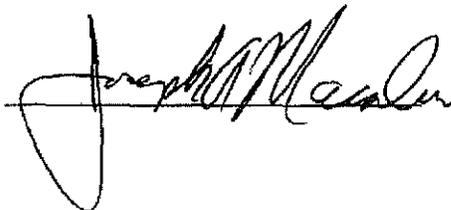


CERTIFICATE OF RESIDENCE

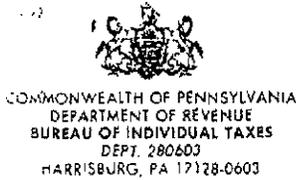
I hereby certify that the precise residence of the within Grantees is:

7518 Friendship Village Rd., Chambersburg, PA 17202

Witness my hand this 16 day of December, 2008.



COPY



REALTY TRANSFER TAX STATEMENT OF VALUE

See Reverse for Instructions

RECORDER'S USE ONLY	
State Tax Paid	0
Book Number	08
Page Number	23830
Date Recorded	12/17/08

Complete each section and file in duplicate with Recorder of Deeds when (1) the full value/consideration is not set forth in the deed, (2) when the deed is without consideration, or by gift, or (3) a tax exemption is claimed. A Statement of Value is not required if the transfer is wholly exempt from tax based on: (1) family relationship or (2) public utility easement. If more space is needed, attach additional sheet(s).

A CORRESPONDENT - All inquiries may be directed to the following person:

Name	Joseph A. Macaluso	Telephone Number:	
Street Address	9614 Rowe Run Loop	Area Code (717)	532-4832
City	Shippensburg	State	PA
		Zip Code	17257

B TRANSFER DATA

Date of Acceptance of Document	12-16-08
Grantor(s)/Lessor(s)	Estate of Harvey M. Lehman
Grantee(s)/Lessee(s)	Harvey M. Lehman Credit Shelter Trust
Street Address	c/o Wayne E. Lehman, Co-Executor
Street Address	c/o Wayne E. Lehman, Co-Trustee
7518 Friendship Village Road	7518 Friendship Village Road
City	Chambersburg
State	PA
Zip Code	17202

C PROPERTY LOCATION

Street Address	686 Mower Road	City, Township, Borough	Greene Township
County	Franklin County	School District	Chambersburg Area
		Tax Parcel Number	09-C18-30

D VALUATION DATA

1. Actual Cash Consideration	0	2. Other Consideration	0	3. Total Consideration	0
4. County Assessed Value	\$40,730.00	5. Common Level Ratio Factor	X	6. Fair Market Value	

E EXEMPTION DATA

1a. Amount of Exemption Claimed	100%	1b. Percentage of Interest Conveyed	50%
---------------------------------	------	-------------------------------------	-----

Check Appropriate Box Below for Exemption Claimed

- Will or intestate succession (Name of Decedent) (Estate File Number)
- Transfer to Industrial Development Agency.
- Transfer to a trust. (Attach complete copy of trust agreement identifying all beneficiaries.) credit shelter trust attached
- Transfer between principal and agent. (Attach complete copy of agency/straw party agreement.)
- Transfers to the Commonwealth, the United States and Instrumentalities by gift, dedication, condemnation or in lieu of condemnation (If condemnation or in lieu of condemnation, attach copy of resolution.)
- Transfer from mortgagor to a holder of a mortgage in default. Mortgage Book Number _____, Page Number _____
- Corrective or confirmatory deed. (Attach complete copy of the prior deed being corrected or confirmed.)
- Statutory corporate consolidation, merger or division. (Attach copy of articles.)
- Other (Please explain exemption claimed, if other than listed above.)

Under penalties of law, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.

Signature of Correspondent or Responsible Party	Date
	12-17-08

FAILURE TO COMPLETE THIS FORM PROPERLY OR ATTACH APPLICABLE DOCUMENTATION MAY RESULT IN THE RECORDER'S REFUSAL TO RECORD THE DEED.

Franklin County Register And Recorder
Linda Miller
Courthouse 157 Lincoln Way East
Chambersburg, PA 17201
Phone: (717) 261-3872

2008-023830

Instrument Number: 2008-023830

Record Date: 12/17/2008

Instrument Type: DEED

Record Time: 16:10:24

Receipt No.: 303124

Receipt Distribution	
Fee/Tax Description	Payment Amount
DEED	16.00
DEED - WRIT	.50
DEED - RTT STATE	.00
CHAMBERSBURG	.00
GREENE TOWNSHIP	.00
DEED AFFORDABLE HS	11.05
DEED A/H ADMIN FEE	1.95
J.C.S. / A.T.J	10.00
CO IMPROVEMENT FND	2.00
REC. IMPRVMENT FUND	3.00

Check# 2992	\$44.50
Total Received.....	\$44.50

Paid By Remarks: LEHMAN EST-CREDIT SHELTER DSSQ
JOSEPH A MACALUSO

COPY

I hereby CERTIFY that this document is recorded in the Recorder's Office of Franklin County, Pennsylvania



Linda Miller
Linda Miller
Recorder of Deeds

Certification Page
DO NOT DETACH
This page is now part of this legal document.

NOTE: Some information subject to change during the verification process and may not be reflected on this page.

DEED

THIS DEED, made the 24th day of February, 2009, by and between Vera M. Lehman, widow, of 232 Village Square, Menno Haven, Chambersburg, PA 17201, GRANTOR, and Wayne E. Lehman, married, of 7518 Friendship Village Rd., Chambersburg, PA 17202, Donald R. Lehman, married, of 1865 Buchanan Trail East Shady Grove, PA 17256, Jane L. Martin, married, of 12989 Mt. Pleasant Rd., Mercersburg, PA 17236, Kenneth L. Lehman, married, of 1592 Fairview Avenue, Chambersburg, PA 17202, and Lester E. Lehman, married, of 4427 Rumler Rd., Chambersburg, PA 17202, GRANTEES, as tenants in common, each owning an undivided one-fifth (1/5th) interest in the hereinafter described real estate.

WITNESSETH, that in consideration of natural love and affection, the said Grantor does hereby grant and convey in fee simple her undivided one-half (1/2) interest in the hereinafter described real estate, to the said Grantees, as tenants in common, each owning an undivided one-fifth (1/5th) interest in the same,

ALL the following described two tracts of real estate lying and being situate in Greene Township, Franklin County, Pennsylvania, bounded and described as follows:

TRACT No. 1:

BEGINNING at a post at corner of private road, Tract No. 2 herein; thence by land formerly of Walter Oyler, now or formerly of Nichol's and lands formerly of Jere Dull, now or formerly Mrs. Nelson Horn, North 86 degrees East 140 perches to a stone, formerly a white oak; thence by land formerly of Fisher now or formerly Small, and lands formerly of Isabelle B. McLanagan, now or formerly Frey across a private road North 10 degrees East, 95 perches to a post; thence by land formerly of McLanagan now or formerly Frey North 66-1/2 degrees West 111-1/2 perches to a post; thence by land formerly of Rife now or formerly White and lands now or formerly of Leon H. Mower, South 32-3/4 degrees West 42.9 perches to a post; thence by land now or formerly of said Mower South 15 degrees West 118-1/2 perches to a post, the place of BEGINNING. CONTAINING 100 acres and 14 perches.

TRACT No. 2:

BEGINNING at a stone in the private road at lands formerly of Oyler now or formerly of Nichol's; thence across said private road North 15-1/8 degrees East 18 feet 4 inches to a stone; thence by land formerly of Jeremiah F. Ashway Estate now or formerly of Leon H. Mower South 85-3/4 degrees West 59.95 perches to a stone in public road; thence in said public road South 5 degrees West 18 feet to a stone in said public road at lands formerly Thomas Miller now or formerly Ebersole thence by land now or formerly of said Ebersole and Nichol's, North 85-3/4 degrees East 59.75 perches to a stone, the place

of BEGINNING. CONTAINING 65.2 perches, as shown by draft of S. V. Wingert, C.S., dated November 15, 1904.

Being the same real estate which Harvey M. Lehman and Vera M. Lehman, husband and wife, by deed dated January 17, 2006, and recorded in Franklin County, PA, Record Book Volume 3031, Page 173, conveyed to Harvey M. Lehman and Vera M. Lehman, husband and wife, as tenants in common, each owning an undivided one-half interest.

TOGETHER WITH AND SUBJECT ALSO TO all easements, rights-of-way, conditions, restrictions, and reservations recorded in the chain of title or visible by inspection of the premises and all notes set forth in any survey of record for the premises.

Joseph A. Macaluso served strictly as scrivener in connection with the preparation of this deed and the Grantor and Grantees specifically requested that no title examination be conducted for the within described premises.

AND the said Grantor will warrant specially the property hereby conveyed.

IN WITNESS WHEREOF, said Grantor has hereunto set her hand and seal.

Witness:

Joseph A. Macaluso

Vera M. Lehman (SEAL)
Vera M. Lehman

COPY

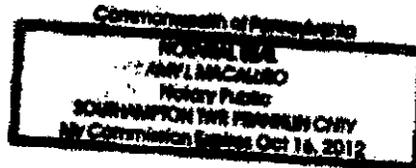
ACKNOWLEDGMENT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF FRANKLIN

SS

On this ____ day of February, 2009, before me, the undersigned officer, personally appeared Vera M. Lehman, widow, known to me (or satisfactorily proven), to be the person whose name is subscribed to the within instrument, and acknowledged the foregoing deed to be her act and deed, and desired the same to be recorded as such. Witness my hand and official seal, the day and year aforesaid.

Amy L. Macaluso
Notary Public

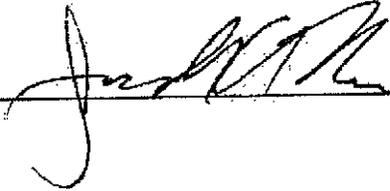


CERTIFICATE OF RESIDENCE

I hereby certify that the precise address of the within Grantees is:

7518 Friendship Village Rd., Chambersburg, PA 17202

Witness my hand this 24th day of February, 2009.



COPY



COUNTY OF FRANKLIN
RECORDER OF DEEDS
Linda Miller, Recorder
Courthouse 157 Lincoln Way East
Chambersburg, PA 17201
Phone: (717) 261-3872

* RETURN DOCUMENT TO:
JOSEPH A MACALUSO
9614 ROWE RUN LOOP
SHIPPENSBURG, PA 17257

Instrument Number - 200904069
Recorded On 2/26/2009 At 3:07:46 PM

* Instrument Type - DEED
Invoice Number - 2058 User ID - DSS
* Grantor - LEHMAN, VERA M
* Grantee - LEHMAN, WAYNE E

* Total Pages - 4

* FEE'S

STATE WRIT TAX	\$0.50
STATE JCS/ACCESS TO JUSTICE	\$10.00
COUNTY RECORDING FEE	\$14.00
AFFORDABLE HOUSING	\$11.05
AFFORDABLE HOUSING	\$1.95
COUNTY IMPROVEMENT FEE	\$2.00
ROD IMPROVEMENT FEE	\$3.00
TOTAL PAID	\$42.50

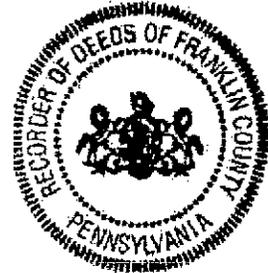
This is a certification page

DO NOT DETACH

**This page is now part
of this legal document.**

I hereby CERTIFY that this document is recorded in the Recorder of Deeds Office of Franklin County, Pennsylvania.

Linda Miller
Linda Miller
Recorder of Deeds



* - Information denoted by an asterisk may change during the verification process and may not be reflected on this page.

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

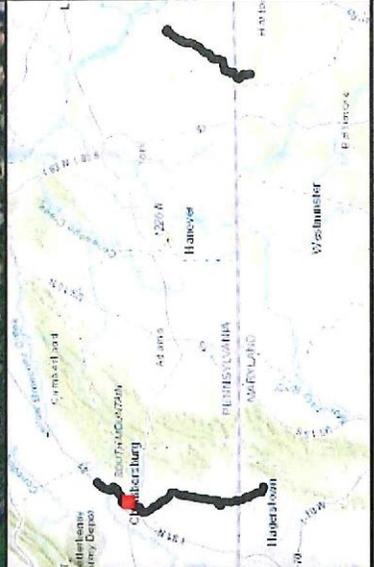
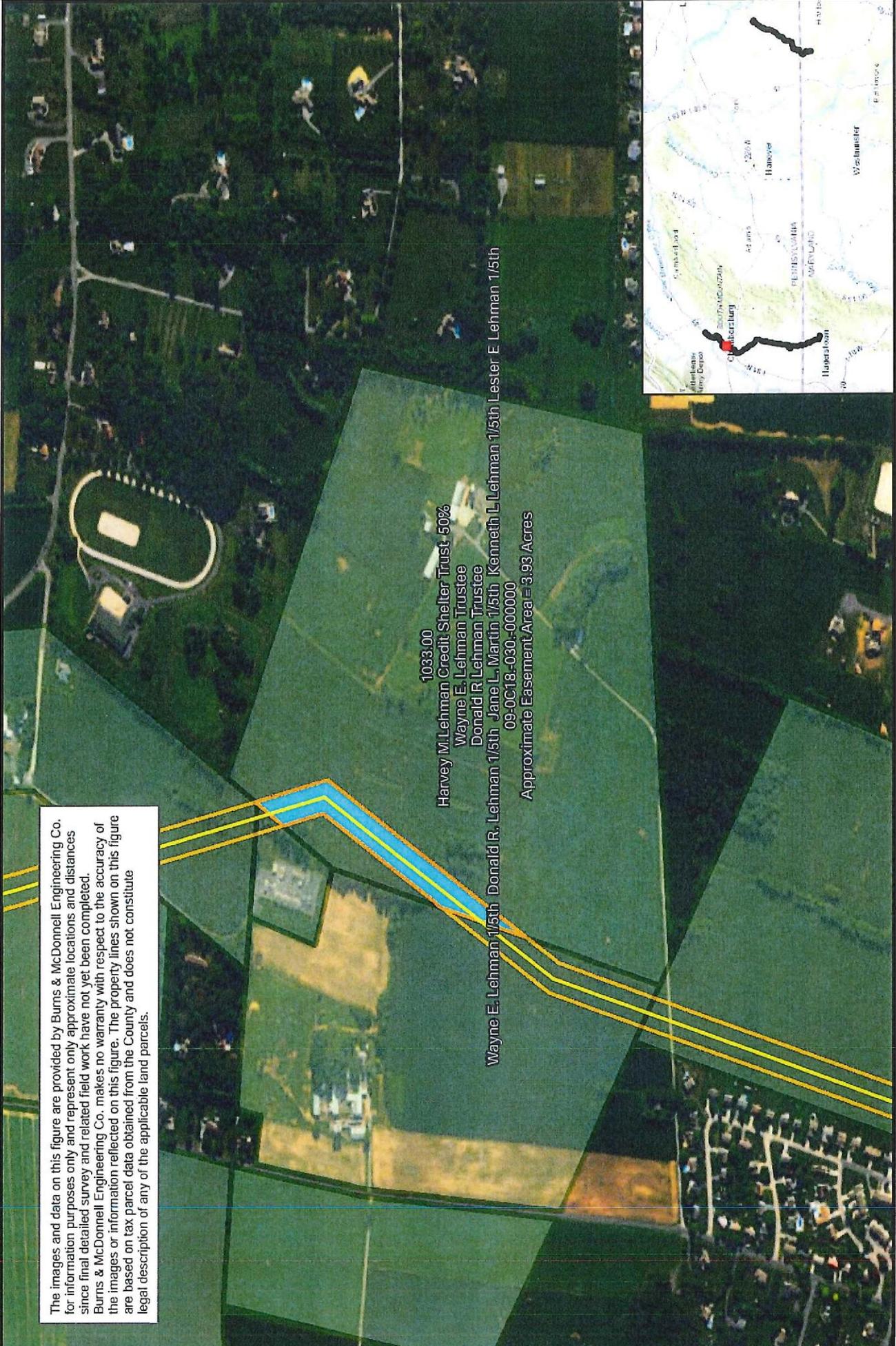
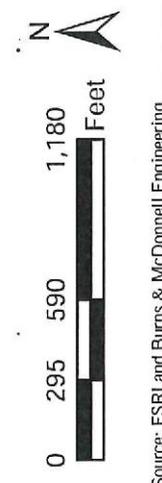


EXHIBIT A
 Owner:
 Harvey M. Lehman Credit Shelter Trust - 50%
 Franklin PA
 Parcel ID: 1033.00
 Rice to Ringgold



Centerline
 Parcel Within ROW
 Parcels
 ROW Approximately 130'

Source: ESRI and Burns & McDonnell Engineering.

Issued: April, 23 2018

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED
2018 MAY 15 AM 11:26
PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

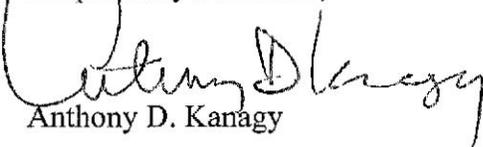
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Lemma & O'Connor Investors LLC in Greene Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,


Anthony D. Kanagy

ADK/sme
Enclosures

Rosemary Chiavetta, Secretary

May 15, 2018

Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

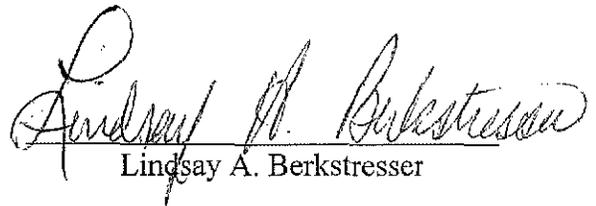
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Lemma & O'Connor Investors LLC
3645 Fox Hill Drive
Chambersburg, PA 17202

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Lemma & O'Connor Investors LLC :
in Greene Township, Franklin County, :
Pennsylvania for the Siting and Construction :
of the 230 kV Transmission Line Associated :
with the **Independence Energy Connection-** :
West Project is Necessary or Proper for the :
Service, Accommodation, Convenience or :
Safety of the Public :
:

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Lemma & O’Connor Investors LLC in Greene Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA's attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the "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-West Project in Portions of Franklin County, Pennsylvania" ("IEC-West

Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by Lemma & O'Connor Investors LLC in Greene Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Lemma & O'Connor Investors LLC property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Lemma & O'Connor Investors LLC. The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its

functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response, Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource

PA's Maryland affiliate, Transource Maryland, LLC ("Transource MD"), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM's Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical,

construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at Grand Point Road, Chambersburg, Franklin County, Pennsylvania 17202.

32. A deed for the property is recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Instrument Number 201403334 and a copy of said recorded deed is attached hereto as Attachment A.

33. The name and mailing address of the owner of record of said tract of land is Lemma & O'Connor Investors LLC, 3645 Fox Hill Drive, Chambersburg, Pennsylvania 17202.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the Lemma & O’Connor Investors LLC property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through Transource PA’s proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Lemma & O’Connor Investors LLC and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Lemma &

O'Connor Investors LLC and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Lemma & O'Connor Investors LLC, who is/are the record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-

2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Respectfully submitted,



Amanda Riggs Conner (District of Columbia ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcial@aep.com

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

ATTACHMENT A

THIS DEED

MADE THIS 20th day of February, two thousand and fourteen (2014);

BETWEEN: **SCOT-GREENE, INC.**, a Pennsylvania Corporation, with a mailing address of 3587 Camoustie Drive, Franklin County, Pennsylvania,

GRANTOR,

AND: **LEMMA & O'CONNOR INVESTORS, LLC**, a Pennsylvania limited liability company, of 3645 Fox Hill Drive, Franklin County, Pennsylvania,

GRANTEE,

WITNESSETH, that in consideration of the sum of Three Hundred Fifty Thousand and No/100 (\$350,000.00) Dollars, the said Grantor does hereby grant and convey, in fee simple, to the said Grantee,

ALL the following described real estate lying and being situate in Greene Township, Franklin County, Pennsylvania, bounded and limited as follows:

TRACT NO. 1: BEGINNING at a stone at corner of other land now or formerly of Scot-Greene, Inc. and land now or formerly of Christian Frey; thence by the latter, South 4-3/8 degrees West 669.90 feet to a stone; thence by the same, South 86-7/8 degrees West 821.70 feet to a stone at land now or formerly of Harold Culbertson; thence by the latter, South 4-3/8 degrees West 1585.65 feet to a stone on line of land now or formerly of George Brindle; thence by the latter, North 89 degrees East 1506.45 feet to a stone; thence by the same and across the right-of-way of Interstate 81, South 77-1/8 degrees East 1801.80 feet to a post at the East side of the Conococheague Creek at corner of land now or formerly of H.C. Cook; thence by the latter, North 11-1/4 degrees East 549.45 feet to a point in the right-of-way of Interstate 81; thence by the same, North 05 degrees West 615.45 feet to a stone; thence by the same, South 84-3/8 degrees East 768.90 feet to a stone at the East side of a run at corner of land now or formerly of H.C. Cook; thence by the latter and land now or formerly of Alfred M. Byers, and again crossing the right-of-way of Interstate 81, South 76-1/8 degrees East 303.60 feet to a stone on the West side of a public road; thence by land now or formerly of Alfred M. Byers, North 40 degrees East 18.15 feet to a stone in said public road; thence, and recrossing the right-of-way of Interstate 81, North 75-7/8 degrees West 259.05 feet to a stone; thence North 81-3/4 degrees West 302.78 feet to a stone; thence by land now or formerly of Alfred M. Byers, North 83-3/4 degrees West 463.65 feet to a stone; thence by the same, North 69 degrees West 207.29 feet to a black oak stump; thence, North 56 degrees West 115.50 feet to a stone on the East side of the Conococheague Creek;

thence by the latter, North 09 degrees East 313.50 feet to a point; thence North 16 degrees East 158.40 feet to a point; thence, South 80-1/2 degrees East 181.50 feet to a stone; thence, North 07 degrees East 165.00 feet to a point; thence, North 74-1/2 degrees East 82.50 feet to a stone; thence, South 82 degrees East 224.40 feet to a gum tree on line of land now or formerly of John Leshar; thence, North 81 degrees West by land now or formerly of the Chambersburg Golf Club 1133.55 feet to a stone; thence by the same, South 86-1/4 degrees West 432.30 feet to a stone; thence by land now or formerly of Scot-Greene, Inc., South 88 degrees West 450.00 feet to a point; thence by the same, North 4-3/8 degrees East 660.00 feet to a point; thence still by the same, South 88 degrees West, 741.30 feet to a stone, the place of beginning. **CONTAINING** 139.81 acres, more or less.

BEING the same real estate conveyed to Scot-Greene, Inc., a Pennsylvania corporation, by deed of Lonny A. Rotz, also known as Lonnie A. Rotz, single, Ernest F. Rotz and Carolyn G. Rotz, husband and wife, and Harry R. Rotz, Jr. and Susan D. Rotz, husband and wife, dated April 26, 1994, and recorded in Franklin County Deed Book Volume 1215, Page 521.

ALL that strip or parcel of land, sixty (60) feet wide, situate in the Township of Greene, County of Franklin, Commonwealth of Pennsylvania, and being all of the right, title and interest of the Grantor herein and to all those certain pieces or parcels of land and premises, easements, rights-of-way and any other rights of any kind whatsoever appurtenant thereto or used in conjunction therewith on and along that property of the Waynesboro Branch of the former Pennsylvania Railroad Company (Predecessor of said Grantor), described as follows:

TRACT NO. 2: **BEGINNING** at an East/West line as extended across the right-of-way of said railroad through a point in the centerline thereof at Railroad Valuation Station 115+63, the same being the Southerly sale line of property conveyed from Penn Central Properties, Inc., and The Penn Central Corporation to Scot-Greene, Inc., by deed dated October 19, 1987; thence extending in a Southeasterly direction along the centerline of said railroad a distance of 5,131 feet, more or less, to a Northeast/Southwest property line as extended across the right-of-way of said railroad through a point in the centerline thereof at Railroad Valuation Station 166+94, being the place of ending.

TOGETHER with all of Grantor's right, title and interest of, in and to a thirty (30) foot access easement as reserved in said October 19, 1987, deed to Scot-Greene, Inc.

BEING the same real estate conveyed to Scot-Greene, Inc., a business corporation organized and existing under the laws of the Commonwealth of Pennsylvania, by Quitclaim Deed of Penn Central Properties, Inc., a Pennsylvania corporation, and American Premier Underwriters, Inc. (formerly The Penn Central

Corporation), a Pennsylvania corporation, dated April 26, 1994, and recorded in Franklin County Deed Book Volume 1217, Page 304.

LESS, HOWEVER, Lot E-22 conveyed to Anthony J. Metz and wife by deed dated April 22, 1994, and recorded in Franklin County Deed Book Volume 1215, Page 111.

LESS, HOWEVER, Lot E-18 conveyed to David E. Bahr and wife by deed dated October 11, 1994, and recorded in Franklin County Deed Book Volume 1234, Page 524.

LESS, HOWEVER, Lot E-17A conveyed to John D. Magaro by deed dated November 30, 1994, and recorded in Franklin County Deed Book Volume 1240, Page 497.

LESS, HOWEVER, Lot E-20 conveyed to Phillip S. Cosentino and wife by deed dated May 11, 1995, and recorded in Franklin County Deed Book Volume 1257, Page 105.

LESS, HOWEVER, Lot E-12 conveyed to Paula M. Clements by deed dated April 29, 1996, and recorded in Franklin County Deed Book Volume 1295, Page 356.

LESS, HOWEVER, Lot 116 conveyed to Paul R. Nolt by deed dated November 12, 1996, and recorded in Franklin County Deed Book Volume 1317, Page 592.

LESS, HOWEVER, Lot 115 conveyed to Rodger Reese and wife by deed dated January 20, 1997, and recorded in Franklin County Deed Book Volume 1324, Page 633.

LESS, HOWEVER, Lot 117 conveyed to Paul R. Nolt by deed dated March 3, 1997, and recorded in Franklin County Deed Book Volume 1328, Page 449.

LESS, HOWEVER, Lot E-23 conveyed to Greenehampton Enterprises, Inc., by deed dated March 4, 1997, and recorded in Franklin County Deed Book Volume 1328, Page 582.

LESS, HOWEVER, Lot 118 conveyed to Donald L. Garris and wife by deed dated April 30, 1997, and recorded in Franklin County Deed Book Volume 1334, Page 20.

LESS, HOWEVER, Lot 122 conveyed to Central Pennsylvania Conference Methodist Church, by deed dated March 31, 1998, and recorded in Franklin County Deed Book Volume 1373, Page 284.

LESS, HOWEVER, Lot 114 conveyed to James Thomas Dodson and wife by deed dated April 14, 1998, and recorded in Franklin County Deed Book Volume 1373, Page 489.

LESS, HOWEVER, Lot 121 conveyed to Larry R. Reese, et al, by deed dated April 27, 1998, and recorded in Franklin County Deed Book Volume 1375, Page 405.

LESS, HOWEVER, Lot 120 conveyed to Frank L. Cottingham and wife by deed dated July 20, 1998, and recorded in Franklin County Deed Book Volume 1388, Page 426.

LESS, HOWEVER, Lot 88 conveyed to Michael A. Suranno, Jr. and wife by deed dated September 4, 1998, and recorded in Franklin County Deed Book Volume 1396, Page 460.

LESS, HOWEVER, Lot 84-A conveyed to Rocco D. Ludvico and wife by deed dated November 12, 1998, and recorded in Franklin County Deed Book Volume 1406, Page 278.

LESS, HOWEVER, Lot 90 conveyed to Vincenzo Mannarella and wife by deed dated November 12, 1998, and recorded in Franklin County Deed Book Volume 1411, Page 388.

LESS, HOWEVER, Lot 113 conveyed to Willis N. Harman and wife by deed dated January 26, 1999, and recorded in Franklin County Deed Book Volume 1416, Page 120.

LESS, HOWEVER, Lot 119 conveyed to Ronald K. Statler and wife by deed dated March 29, 1999, and recorded in Franklin County Deed Book Volume 1424, Page 559.

LESS, HOWEVER, Lot 112 conveyed to Conley Dixon by deed dated April 16, 1999, and recorded in Franklin County Deed Book Volume 1428, Page 25.

LESS, HOWEVER, Lot 2 conveyed to Lawrence J. Sylvester and wife by deed dated May 7, 1999, and recorded in Franklin County Deed Book Volume 1431, Page 303.

LESS, HOWEVER, Lot 93 conveyed to Howard M. Lebow and wife by deed dated June 23, 1999, and recorded in Franklin County Deed Book Volume 1438, Page 51.

LESS, HOWEVER, Lot 89 conveyed to Saw Htun, et al, by deed dated July 8, 1999, and recorded in Franklin County Deed Book Volume 1440, Page 430.

LESS, HOWEVER, Lot 84 conveyed to Anna B. Conrad by deed dated September 30, 1999, and recorded in Franklin County Deed Book Volume 1453, Page 365.

LESS, HOWEVER, Lot 92 conveyed to Alan E. Antoniewicz and wife by deed dated November 10, 1999, and recorded in Franklin County Deed Book Volume 1460, Page 299.

LESS, HOWEVER, Lot 1 conveyed to David W. Stauffer and wife by deed dated November 10, 1999, and recorded in Franklin County Deed Book Volume 1462, Page 93.

LESS, HOWEVER, Lot 9 conveyed to Philip S. Cosentino and wife by deed dated November 10, 1999, and recorded in Franklin County Deed Book Volume 1462, Page 438.

LESS, HOWEVER, Lot 95 conveyed to Elaine E. Davis and husband by deed dated January 1, 2000, and recorded in Franklin County Record Book Volume 1469, Page 613.

LESS, HOWEVER, Lot 94 conveyed to Thomas J. Trgovac and wife by deed dated April 20, 2000, and recorded in Franklin County Record Book Volume 1500, Page 474.

LESS, HOWEVER, Lot 91 conveyed to David E. Eubanks and wife by deed dated June 29, 2000, and recorded in Franklin County Record Book Volume 1531, Page 612.

LESS, HOWEVER, Lot 129A conveyed to David K. Mann III and wife by deed dated July 13, 2000, and recorded in Franklin County Record Book Volume 1537, Page 493. (Corrected by Correctory Deed dated December 29, 2000, and recorded in Franklin County Record Book Volume 1593, Page 182.)

LESS, HOWEVER, Lot 133 conveyed to Lloyd A. Wilcox and wife by deed dated July 28, 2000, and recorded in Franklin County Record Book Volume 1531, Page 612.

LESS, HOWEVER, Lot 6 conveyed to Grenehampton Enterprises, Inc. by deed dated September 5, 2000, and recorded in Franklin County Record Book Volume 1554, Page 235.

LESS, HOWEVER, Lot 140 conveyed to Rodger L. Reese and wife by deed dated October 11, 2000, and recorded in Franklin County Record Book Volume 1569, Page 200.

LESS, HOWEVER, Lot 134 conveyed to Dale C. Wagner and wife by deed dated May 5, 2000, and recorded in Franklin County Record Book Volume 1588, Page 90.

LESS, HOWEVER, Lot 3 conveyed to Sean J. Glennon by deed dated January 30, 2001, and recorded in Franklin County Record Book Volume 1604, Page 580.

LESS, HOWEVER, Lot 7 conveyed to Greenehampton Enterprises, Inc. by deed dated February 19, 2001, and recorded in Franklin County Record Book Volume 1625, Page 113.

LESS, HOWEVER, Lot 132 conveyed to Bradley A. Beaver and wife by deed dated March 26, 2001, and recorded in Franklin County Record Book Volume 1631, Page 608.

LESS, HOWEVER, Lot 131 conveyed to Ronald G. Lyons and wife by deed dated May 7, 2001, and recorded in Franklin County Record Book Volume 1651, Page 81.

LESS, HOWEVER, Lot 4 conveyed to Robert J. Hickey and wife by deed dated August 1, 2001, and recorded in Franklin County Record Book Volume 1703, Page 416.

LESS, HOWEVER, Lot 110 conveyed to Frank G. Brown by deed dated September 14, 2001, and recorded in Franklin County Record Book Volume 1726, Page 556.

LESS, HOWEVER, Lot 11 conveyed to Larry D. Junker, et al, by deed dated November 13, 2001, and recorded in Franklin County Record Book Volume 1763, Page 367.

LESS, HOWEVER, Lot 111 conveyed to Dr. Frank D. Burns by deed dated November 29, 2001, and recorded in Franklin County Record Book Volume 1778, Page 513.

LESS, HOWEVER, Lot 139 conveyed to Christopher H. Hershey and wife by deed dated January 31, 2002, and recorded in Franklin County Record Book Volume 1817, Page 225.

LESS, HOWEVER, Lot 108 conveyed to William L. Davis and wife by deed dated May 23, 2002, and recorded in Franklin County Record Book Volume 1887, Page 342.

LESS, HOWEVER, Lot 109 conveyed to Robert D. Fogal, Sr. and wife by deed dated July 18, 2002, and recorded in Franklin County Record Book Volume 1918, Page 402.

LESS, HOWEVER, Lot 130 conveyed to John D. Glander and wife by deed dated July 31, 2002, and recorded in Franklin County Record Book Volume 1929, Page 593.

LESS, HOWEVER, Lot 106 conveyed to Lloyd A. Wilcox and wife by deed dated October 10, 2002, and recorded in Franklin County Record Book Volume 1977, Page 103.

LESS, HOWEVER, Lot 97 conveyed to Ralph W. Lumbatis and wife by deed dated December 6, 2002, and recorded in Franklin County Record Book Volume 2016, Page 523.

LESS, HOWEVER, Lot 5 conveyed to Joseph A. Tice and wife by deed dated January 23, 2003, and recorded in Franklin County Record Book Volume 2046, Page 512. (Corrected by Correctory Deed dated May 26, 2005, and recorded in Franklin County Record Book Volume 2783, Page 562.)

LESS, HOWEVER, Lot 96 conveyed to Tammi M. Hennessy by deed dated March 31, 2003, and recorded in Franklin County Record Book Volume 2102, Page 60.

LESS, HOWEVER, Lot 142 conveyed to Robert W. Perry, Jr. and wife by deed dated April 28, 2003, and recorded in Franklin County Record Book Volume 2138, Page 451.

LESS, HOWEVER, Lot 129 conveyed to Thomas R. Dudney and wife by deed dated September 29, 2003, and recorded in Franklin County Record Book Volume 2276, Page 37.

LESS, HOWEVER, Lot 138 conveyed to John F. Robinson and wife by deed dated November 4, 2003, and recorded in Franklin County Record Book Volume 2308, Page 201.

LESS, HOWEVER, Lot 107 conveyed to Rowan D. Elsom by deed dated January 7, 2004, and recorded in Franklin County Record Book Volume 2352, Page 449.

LESS, HOWEVER, Lot 39 conveyed to Leonard K. Lock and wife by deed dated January 7, 2004, and recorded in Franklin County Record Book Volume 2354, Page 82.

LESS, HOWEVER, Lot 159 conveyed to William Fabritius and wife by deed dated January 27, 2004, and recorded in Franklin County Record Book Volume 2366, Page 33.

LESS, HOWEVER, Lot 136 conveyed to William F. McCarthy by deed dated May 10, 2004, and recorded in Franklin County Record Book Volume 2448, Page 549.

LESS, HOWEVER, Lot 141 conveyed to Jerry B. Thomason and wife by deed dated June 25, 2004, and recorded in Franklin County Record Book Volume 2497, Page 480.

LESS, HOWEVER, Lot 40 conveyed to Kevin B. Drabic and wife by deed dated July 22, 2004, and recorded in Franklin County Record Book Volume 2519, Page 1.

LESS, HOWEVER, Lot 100 conveyed to William Patrick Wakefield by deed dated September 28, 2004, and recorded in Franklin County Record Book Volume 2583, Page 115.

LESS, HOWEVER, Lot 103 conveyed to Anthony E. Nicastro, et al, by deed dated September 28, 2004, and recorded in Franklin County Record Book Volume 2590, Page 258.

LESS, HOWEVER, Lot 65 conveyed to William B. Bunting and wife by deed dated October 25, 2004, and recorded in Franklin County Record Book Volume 2603, Page 344.

LESS, HOWEVER, Lot 10 conveyed to William D. Bricker and wife by deed dated October 25, 2004, and recorded in Franklin County Record Book Volume 2607, Page 579.

LESS, HOWEVER, Lot 98 conveyed to Dale C. Wagner by deed dated November 26, 2004, and recorded in Franklin County Record Book Volume 2637, Page 310.

LESS, HOWEVER, Lot 12 conveyed to Katrina N. Haslett by deed dated December 29, 2004, and recorded in Franklin County Record Book Volume 2664, Page 513.

LESS, HOWEVER, Lot 8 conveyed to Philip S. Cosentino and wife by deed dated April 7, 2005, and recorded in Franklin County Record Book Volume 2738, Page 105.

LESS, HOWEVER, Lot 135 conveyed to Frederic V. Salerno and wife by deed dated April 14, 2005, and recorded in Franklin County Record Book Volume 2743, Page 17.

LESS, HOWEVER, Lot 5 conveyed to Joseph A. Tice and wife by deed dated May 26, 2005, and recorded in Franklin County Record Book Volume 2783, Page 562. (Correctory Deed for Volume 2046, Page 512).

LESS, HOWEVER, Lot 99 conveyed to Charles T. Huseman and wife by deed dated September 27, 2005, and recorded in Franklin County Record Book Volume 2915, Page 304.

LESS, HOWEVER, Lot 66 conveyed to Brent W. VanScoik and wife by deed dated October 18, 2005, and recorded in Franklin County Record Book Volume 2936, Page 152.

LESS, HOWEVER, Lot 102 conveyed to Brett J. Rockers and wife by deed dated November 3, 2005, and recorded in Franklin County Record Book Volume 2961, Page 370.

LESS, HOWEVER, Lot 146 conveyed to Jeffrey W. Furry and wife by deed dated February 28, 2006, and recorded in Franklin County Record Book Volume 3059, Page 305.

LESS, HOWEVER, Lot 171 conveyed to Brandale, LLC by deed dated February 28, 2006, and recorded in Franklin County Record Book Volume 3061, Page 178.

LESS, HOWEVER, Lot 101 conveyed to Craig Foote and wife by deed dated February 28, 2006, and recorded in Franklin County Record Book Volume 3063, Page 249.

LESS, HOWEVER, Lot 128 conveyed to Philip R. Harkins, Jr. and wife by deed dated August 2, 2006, and recorded in Franklin County Record Book Volume 3219, Page 363.

LESS, HOWEVER, Lot 158 conveyed to Brandale, LLC by deed dated September 7, 2006, and recorded in Franklin County Record Book Volume 3251, Page 274.

LESS, HOWEVER, Lot 85 conveyed to William G. Lavery and wife by deed dated March 28, 2007, and recorded in Franklin County Record Book Volume 3435, Page 348.

LESS, HOWEVER, Lot 105 conveyed to Kristofer W. Browne by deed dated May 22, 2007, and recorded in Franklin County Record Book Volume 3489, Page 591.

LESS, HOWEVER, Lot 104 conveyed to Todd R. Hamilton and wife by deed dated August 22, 2007, and recorded in Franklin County Record Book Volume 3561, Page 289.

LESS, HOWEVER, Lot 86 conveyed to Craig A. Kollar and wife by deed dated June 30, 2008, and recorded in Franklin County at Instrument Number 2008-13579.

LESS, HOWEVER, Lot 87 conveyed to James L. Thompson and wife by deed dated July 17, 2008, and recorded in Franklin County at Instrument Number 2008-14762.

LESS, HOWEVER, .0356 acres for a right-of-way agreement conveyed to Commonwealth of Pennsylvania by agreement recorded in Franklin County at Instrument Number 2008-11590.

LESS, HOWEVER, Lot 123 conveyed to Virginia R. Regi by deed dated March 17, 2009, and recorded in Franklin County at Instrument Number 2009-06786.

LESS, HOWEVER, Lot 13 conveyed to Albert Tom and wife by deed dated November 5, 2009, and recorded in Franklin County at Instrument Number 2009-25205.

LESS, HOWEVER, Lot 127 conveyed to Dale C. Wagner by deed dated November 16, 2009, and recorded in Franklin County at Instrument Number 2009-25929.

LESS, HOWEVER, Lot 126 conveyed to Todd V. Peterson and wife by deed dated January 5, 2010, and recorded in Franklin County at Instrument Number 2010-00611.

LESS, HOWEVER, Lot 87-A conveyed to Rama Yerram by deed dated March 30, 2010, and recorded in Franklin County at Instrument Number 2010-05678.

LESS, HOWEVER, Lot 124 conveyed to John P. Massimilla and wife by deed dated July 15, 2010, and recorded in Franklin County at Instrument Number 2010-13675.

LESS, HOWEVER, Lot 137 conveyed to Donald G. Stephen and Colleen G. Anderson by deed dated June 20, 2011, and recorded in Franklin County at Instrument Number 2011-12003.

LESS, HOWEVER, Lot 152 conveyed to Leo E. Ronan, Jr., and Terry T. Ronan by deed dated November 22, 2011, and recorded in Franklin County at Instrument Number 2011-22017.

LESS, HOWEVER, Lot 150 conveyed to Richard P. Corbett and Terri L. Corbett by deed dated October 26, 2012, and recorded in Franklin County at Instrument Number 2012-22814.

LESS, HOWEVER, Lot 149 conveyed to Jennifer L. Morris by deed dated November 19, 2012, and recorded in Franklin County at Instrument Number 2012-24812.

LESS, HOWEVER, Lot 147 conveyed to Jeffrey W. Furry and Susan B. Furry by deed dated December 3, 2012, and recorded in Franklin County at Instrument Number 2012-26260.

LESS, HOWEVER, Lot 125, Lots 77 through 82, inclusive, Lots 143 through 145, inclusive, Lot 148, and Lot 151, to be conveyed to Stohan Property Investments, LLC, by deed intended to be recorded prior to the recordation of this instrument.

BEING AND INTENDING TO BE ALL of the real property currently owned by Scot-Greene, Inc., encumbered by that certain Mortgage dated October 4, 2010, granted to Farmers and Merchants Trust Company of Chambersburg, recorded October 5, 2010, in the Office of the Recorder of Deeds for Franklin County, Pennsylvania, at Instrument Number 2010-19398.

BEING a part of the same real estate which Lonny A. Rotz, also known as Lonnie A. Rotz, Ernest F. Rotz and Carolyn G. Rotz, husband and wife, and Harry R. Rotz, Jr., and Susan D. Rotz, husband and wife, by deed dated April 26, 1994, and recorded April 28, 1994, in the Office of the Recorder of Deeds for Franklin County, Pennsylvania, in Deed Book 1215, Page 521, conveyed to Scot-Greene, Inc., a Pennsylvania corporation, Grantor herein, **AND BEING** a part of the same real estate which Penn Central Properties, Inc., a Pennsylvania corporation, and American Premier Underwriters, Inc., (formerly The Penn Central Corporation), Pennsylvania corporation, by Quitclaim Deed dated April 26, 1994, and recorded May 12, 1994, in the Office of the Recorder of Deeds for Franklin County, Pennsylvania, in Deed Book 1217, Page 304, granted and conveyed unto Scot-Greene, Inc., a Pennsylvania corporation, Grantor herein.

SUBJECT to all rights-of-way, restrictions, easements, covenants, conditions, and set back lines, visible or of record.

AND the said Grantor will warrant specially the property hereby conveyed, except as under the subject as aforesaid.

IN WITNESS WHEREOF said Grantor has caused the execution of these presents the day and year first above written.

~~ATTEST~~/WITNESS:

SCOT-GREENE, INC.

[Signature]

BY: [Signature]
Terry A. Wagner, President

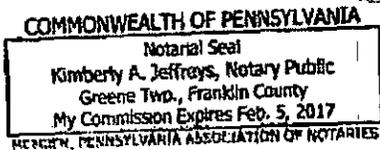
COMMONWEALTH OF PENNSYLVANIA

:
:SS
:

COUNTY OF FRANKLIN

On this 28th day of February, 2014, before me, a Notary Public, personally appeared Terry A. Wagner, who has been satisfactorily proven to be the person whose name is subscribed to this written instrument, who acknowledged himself to be the President of Scot-Greene, Inc., a Pennsylvania corporation, and that he as such President, being authorized so to do, executed the foregoing instrument for the purposes therein contained, by signing the name of the Corporation by himself as President.

IN WITNESS WHEREOF I have hereunto set my hand and official seal.



[Signature]
Notary Public

I hereby certify that the Grantee's complete post office address is

3145 Fox Hill Drive, Chambersburg, PA 17202

Witness my hand this 28th day of February, 2014.

[Signature]
Agent of the Grantee



**COUNTY OF FRANKLIN
RECORDER OF DEEDS**
Linda Miller, Recorder
Courthouse 157 Lincoln Way East
Chambersburg, PA 17201
Phone: (717) 261-3872

***RETURN DOCUMENT TO:**
SALZMANN HUGHES
79 S PAUL DRIVE
CHAMBERSBURG, PA 17201

Instrument Number - 201403334
Recorded On 2/28/2014 At 2:18:55 PM

* Instrument Type - DEED
Invoice Number - 94527 User ID - DSS
* Grantor - SCOT GREEN INC
* Grantee - LEMMA & OCONNOR INVESTORS LLC

* Total Pages - 13

*** FEES**

STATE TRANSFER TAX	\$3,500.00
STATE WRIT TAX	\$0.50
STATE JCS/ACCESS TO JUSTICE	\$23.50
COUNTY RECORDING FEE	\$29.00
AFFORDABLE HOUSING	\$11.05
AFFORDABLE HOUSING	\$1.95
COUNTY IMPROVEMENT FEE	\$2.00
ROAD IMPROVEMENT FEE	\$3.00
CHAMBERSBURG AREA	\$1,750.00
SCHOOL DIST REAL TAX	
GREENE TOWNSHIP	\$1,750.00
TOTAL PAID	\$7,071.00

This is a certification page

DO NOT DETACH

This page is now part
of this legal document.

I hereby CERTIFY that this document is recorded in the Recorder of Deeds Office of Franklin County, Pennsylvania.

Linda Miller
Linda Miller
Recorder of Deeds



* - Information denoted by an asterisk may change during the verification process and may not be reflected on this page.

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

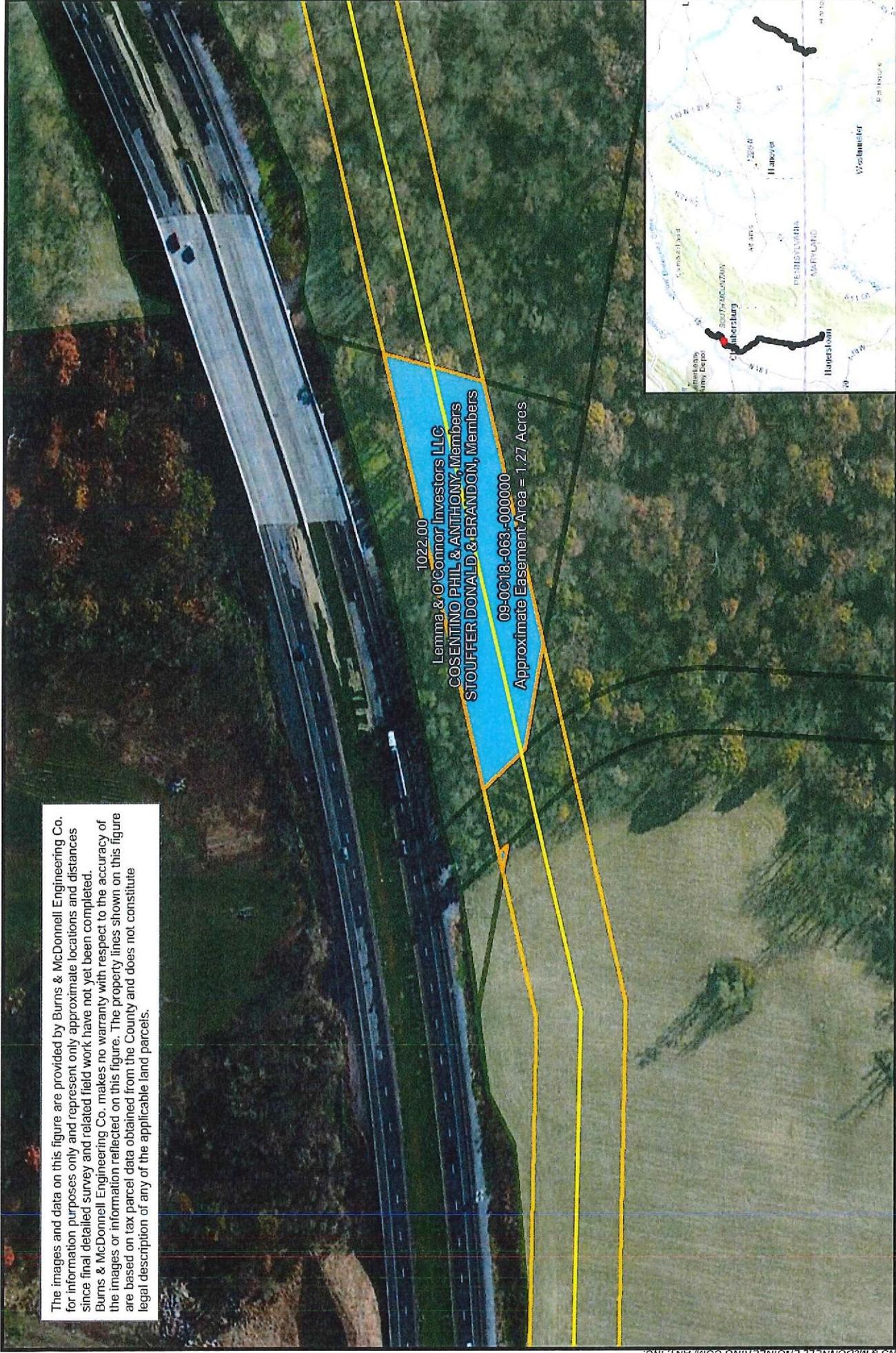
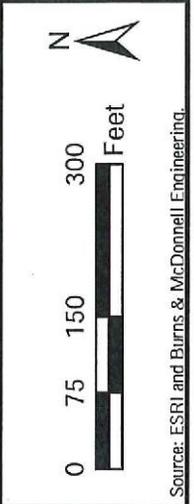


EXHIBIT A
 Owner:
 Lemma & O'Connor Investors LLC
 Franklin PA
 Parcel ID: 1022.00
 Rice to Ringgold



Source: ESRI and Burns & McDonnell Engineering.
 Issued: April, 23 2018

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



RECEIVED
2018 MAY 15 AM 11:21
PA PUC
SECRETARY'S BUREAU
FRONT DESK

17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Richard L. Leshner and Agnes Marie Leshner in Guilford Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/sme
Enclosures

Rosemary Chiavetta, Secretary
May 15, 2018
Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

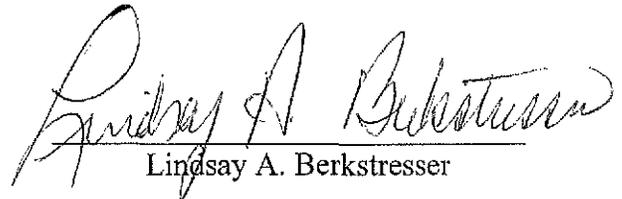
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Richard L. Leshar
Agnes Marie Leshar
1126 Cider Press Road
Chambersburg, PA 17202

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Richard L. Leshner and Agnes Marie :
Leshner in Guilford Township, Franklin County, :
Pennsylvania for the Siting and Construction :
of the 230 kV Transmission Line Associated :
with the **Independence Energy Connection-** :
West Project is Necessary or Proper for the :
Service, Accommodation, Convenience or :
Safety of the Public :

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Richard L. Leshner and Agnes Marie Leshner in Guilford Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA's attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcial@aep.com

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. *A certain portion of the route selected for the IEC-West Project will traverse a portion of the land owned by Richard L. Leshner and Agnes Marie Leshner in Guilford Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Richard L. Leshner and Agnes Marie Leshner property for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.*

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Richard L. Leshner and Agnes Marie

Lesher. The IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response,

Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA’s Maryland affiliate, Transource Maryland, LLC (“Transource MD”), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM’s Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at 1126 Cider Press Road, Chambersburg, Franklin County, Pennsylvania 17202

32. A deed for the property is recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Deed Book 1277, Page Number 0466 and a copy of said recorded deed is attached hereto as Attachment A.

33. The names and mailing address of the owners of record of said tract of land are Richard L. Leshner and Agnes Marie Leshner, 1126 Cider Press Road, Chambersburg, Pennsylvania 17202.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code ("NESC") clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. A map depicting the proposed right-of-way across the Richard L. Leshner and Agnes Marie Leshner property is attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource

PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Richard L. Leshner and Agnes Marie Leshner and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Richard L. Leshner and Agnes Marie Leshner and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Richard L. Leshner and Agnes Marie Leshner, who is/are the

record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filling 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Respectfully submitted,



Amanda Riggs Conner (District of Columbia ID # 481740)
Hector Garcia (VA ID # 48304)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcia1@aep.com

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

44000.00
44000.00

60937

THIS DEED

MADE this 27 day of October, 1995.

BETWEEN Charles O. Wood, III, and Miriam M. Wood, his wife, of 1126 Cider Press Road, Chambersburg, Franklin County, Pennsylvania, GRANTORS,

AND Richard L. Leshner and Agnes Marie Leshner, his wife, of 8601 Bradley Boulevard, Bethesda, Maryland, GRANTEEES.

WITNESSETH, that in consideration of Four Hundred Forty Thousand (\$440,000.00) Dollars, in hand paid, the receipt whereof is hereby acknowledged, the said grantors do hereby grant and convey to the said grantees,

ALL that certain real estate lying and being situate in Guilford Township, Franklin County, Pennsylvania, bounded and described as follows:

BEGINNING at an iron pin set at a point common to lands now or formerly of Walter E. Wheelock and Jean P. Wheelock, his wife, lands now or formerly of William K. Nitterhouse and Diane R. Nitterhouse, his wife, and the westernmost corner of the tract herein described; thence along said lands of Nitterhouse, North 37 degrees 18 minutes 04 seconds East, 443.35 feet to an iron pin; thence continuing along said lands, North 72 degrees 59 minutes 34 seconds East, 303.87 feet to an iron pin; thence continuing along said lands, North 37 degrees 05 minutes 07 seconds East, 352.39 feet to an iron pin at a fence line at lands now or formerly of John F. Eflueger; thence along said lands, south 50 degrees 48 minutes 01 second East, 365.37 feet to an iron pin at a post and a fence line at other lands now or formerly of William K. and Diane R. Nitterhouse; thence by said lands and fence line, South 35 degrees 30 minutes West, 151.70 feet to an iron pin; thence continuing along said lands and fence line and a stone row, South 35 degrees 59 minutes 58 seconds West, 880.86 feet to a white oak at lands now or formerly of Wilbur W. Henry; thence along said lands, North 52 degrees 46 minutes 37 seconds West, 296.63 feet to an iron pin at lands of Walter E. Wheelock and wife; thence along said lands, North 52 degrees 13 minutes 18 seconds West, 269.28 feet to an iron pin, the place of beginning. Containing 11.2957 acres as shown on draft of land by William A. Brindle, R.S., dated June 29, 1976, a copy of which is recorded in Franklin County, Pa., Deed Book Volume 735, Page 500.

BEING the same real estate which Dorothy K. Ross, formerly Dorothy K. Galloway, and Donald E. Ross, her husband, by their deed dated October 27, 1976, and recorded in Franklin County, Pa., Deed Book Volume 735, Page 498, conveyed to Charles O. Wood, III, and Miriam M. Wood, his wife, Grantors herein.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
0 2 2 3 3 1
REALTY TRANSFER TAX
900.00

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
0 2 2 3 3 1
REALTY TRANSFER TAX
900.00

0 2 2 3 3 1
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
REALTY TRANSFER TAX
900.00

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
REALTY TRANSFER TAX
900.00

TOGETHER with the right of ingress, egress and regress to and from the road leading from the Falling Spring Road to New Franklin (state Road 28053) to the tract of land herein conveyed over a 50-foot easement or right-of-way over land of the grantors herein for use as roadway only, the same being described as follows:

East from the road leading from the Falling Spring Road to New Franklin (State Road 28053) over Raven Road to Robin Road; thence South from Raven Road over Robin Road to Wren Road; thence East from Robin Road over Wren Road to Humming Bird Lane; thence North over Humming Bird Lane to a 50-foot roadway that intersects at a right angle; thence over said intersecting 50 foot roadway East in a direct line to the tract of land herein conveyed.

SUBJECT to all existing easements and rights of way of record except that the right of way granted April 4, 1967, to Jay L. Benedict and wife, recorded in Franklin County Deed Book Volume 613, Page 613, has, by indenture dated December 5, 1977, and recorded in Franklin County, Pennsylvania, Deed Book Volume 752, Page 138, been extinguished through the tract of land herein conveyed, and an alternate right of way executed from the grantors herein to the present owners of the land served by the said right of way, their heirs and assigns, i.e., William K. Nitterhouse and Diane R. Nitterhouse, their heirs and assigns.

AND the said grantors do hereby warrant specially the property hereby conveyed.

IN WITNESS WHEREOF, said grantors have hereunto set their hands and seals the day and year first above written.

Witness:

Charles O. Wood (SEAL)
Charles O. Wood, III

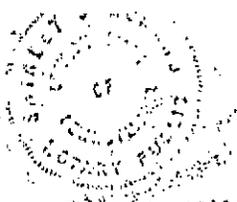
Miriam M. Wood (SEAL)
Miriam M. Wood

COMMISSIONER OF REVENUE
DEPARTMENT OF REVENUE
HARRISBURG, PENNSYLVANIA
00000
RECEIVED
MAY 1978
13 3 3 0

COMMONWEALTH OF PENNSYLVANIA)
) ss:
COUNTY OF FRANKLIN)

On this, the 27th day of October, 1995, before me, a notary public, the undersigned officer, personally appeared Charles O. Wood, III, and Miriam M. Wood, his wife, known to me (or satisfactorily proven) to be the persons whose names are subscribed to the within instrument, and acknowledged that they executed the same for the purpose therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and notarial seal.



Shirley J. Howard

Notary Seal
Shirley J. Howard, Notary Public
Bethesda, Franklin County
Pennsylvania
My Commission Expires June 24, 1995
Member, Pennsylvania Association of Notaries

I hereby certify that the precise address of the grantees herein is 8601 BRADLEY BLVD, BETHESDA, MD 20817

Courtney J. Graham
att'y

I hereby certify that this document is recorded in the Recorder's Office of Franklin County, Pennsylvania.

RECORDED ON RECORD

NOV 14 1995

Recorder for Franklin Co.
(LINE) 3.60 PM
1350



David W. Flowers

David W. Flowers
Recorder of Deeds

GRANT RECEIVED TAX
Membersburg Borough
Shilford Supervisor
Amount Of Tax Received 2,200.00
Tax on Deeds 1350
David W. Flowers

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

1045.00
 LESH, RICHARD L
 LESH, AGNES M H&W

10-0D08-133-000000
 Approximate Easement Area = 0.27 Acres



EXHIBIT A

Owner:
 LESH, RICHARD L
 Franklin PA
 Parcel ID: 1045.00
 Rice to Ringgold



Source: ESRI and Burns & McDonnell Engineering.

-  Centerline
-  Parcels
-  Parcel Within ROW
-  ROW Approximately 130'

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC



17 North Second Street
12th Floor
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717-731-1970 Main
717-731-1985 Main Fax
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Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 166570

May 15, 2018

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC filed Pursuant To 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 Lands of Willis M. Leshar Partnership in Guilford Township, Franklin County, Pennsylvania for the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project is Necessary or Proper for the Service, Accommodation, Convenience or Safety of the Public
Docket No. A-2018-

Dear Secretary Chiavetta:

Enclosed for filing is the Application of Transource Pennsylvania, LLC in the above-referenced proceeding. Also enclosed is a check in the amount of \$350 for payment of the filing fee. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/sme
Enclosures

Rosemary Chiavetta, Secretary
May 15, 2018
Page 2

cc: Honorable Elizabeth Barnes
Honorable Andrew M. Calvelli
Certificate of Service

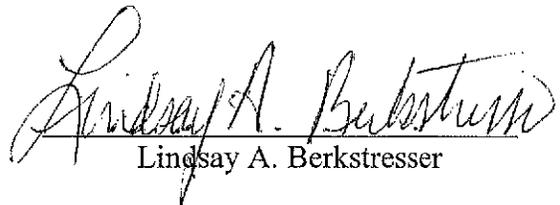
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Willis M. Leshar Partnership
1153 Swamp Fox Road
Chambersburg, PA 17202

Date: May 15, 2018


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed Pursuant To 15 Pa.C.S. §1511(c) for a : Docket No. A-2018-
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 :
Lands of Willis M. Leshar Partnership in :
Guilford Township, Franklin County, :
Pennsylvania for the Siting and Construction :
of the 230 kV Transmission Line Associated :
with the **Independence Energy Connection-** :
West Project is Necessary or Proper for the :
Service, Accommodation, Convenience or :
Safety of the Public :
:
:

APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC (“Transource PA”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination by the Pennsylvania Public Utility Commission (“Commission”) that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of Willis M. Leshar Partnership in Guilford Township, Franklin County, Pennsylvania for the siting and construction of the 230 kV transmission lines associated with the proposed Independence Energy Connection-West Project (“IEC-West Project”) is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Transource PA states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372
Attention: Antonio Smyth

2. Transource PA's attorneys are:

David B. MacGregor (PA ID # 28804)
Anthony D Kanagy (PA ID # 85522)
Lindsay A. Berkstresser (PA ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Amanda Riggs Conner (DC ID # 481740)
Hector Garcia (VA ID # 48304)
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1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-3410
Fax: 614-716-1613
E-mail: arconner@aep.com
E-mail: hgarcial@aep.com

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. 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, LLC ("Transource Energy").

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. By order issued January 23, 2018, the Commission authorized 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 (Order entered January 23, 2018).

6. As such, Transource PA is a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, *as amended*, 15 Pa.C.S. §§ 1101, *et seq.* Transource PA submits this Application pursuant 15 Pa.C.S. § 1511.

7. On December 27, 2017, Transource PA filed the “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-West Project in Portions of Franklin County, Pennsylvania” (“IEC-West Siting Application”), which was docketed at Docket No. A-2017-2640200. Therein, Transource PA is requesting Commission approval of the siting and construction of the Pennsylvania portion of the IEC-West Project in Franklin County, Pennsylvania.¹

8. With the IEC-West Siting Application, Transource PA filed Attachments 1-13, which provide additional detailed information regarding the IEC-West Project. Also accompanying the IEC-West Siting Application are Transource PA Statement Nos. 1-6, which further explain the IEC Project.

9. Upon Commission approval, Transource PA proposes to construct the Independence Energy Connection Project (“IEC Project”) to alleviate transmission congestion

¹ Also on December 27, 2017, Transource filed a related Application 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 at Docket No. A-2017-2640195 (“IEC-East Siting Application”).

constraints in Pennsylvania, Maryland, West Virginia, and Virginia as identified by PJM Interconnection, L.L.C. (“PJM”). The IEC Project approved by PJM involves, among other things, the construction of two new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the Independence Energy Connection-West Project (“IEC-West Project”); and (2) the Furnace Run-Conastone 230 kV Transmission Line or the Independence Energy Connection-East Project (“IEC-East Project”).

10. The IEC-West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the IEC West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

11. A certain portion of the route selected for the IEC-West Project will traverse a portion of the lands owned by Willis M. Leshner Partnership in Guilford Township, Franklin County, Pennsylvania. By this Application, Transource PA is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the Willis M. Leshner Partnership properties for the construction of the transmission lines associated with the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

12. A complete copy of the IEC-West Siting Application, together with the supporting Attachments and Testimony, is being served on Willis M. Leshner Partnership. The

IEC-West Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. A Prehearing Conference was held on March 13, 2018, at which time the IEC-West Siting Application and the IEC-East Siting Application were consolidated. At the Prehearing Conference, counsel for Transource advised that the Company would be filing necessary Condemnation Applications related to the Siting Applications by May 15, 2018.

14. Public input hearings for the IEC – West Project are scheduled for May 22 and 23, 2018. Additionally, an evidentiary hearing for both Siting Applications is scheduled for December 4-7 and 10-12, 2018.

II. NEED FOR THE PROJECT

15. PJM is a FERC-approved Regional Transmission Organization charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control, and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

16. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”). In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies.

17. In October 2014, PJM opened a Long Term Proposal Window (“2014/15 RTEP Long Term Proposal Window”) to solicit proposals to address, among other things, transmission congestion constraints in Pennsylvania, Maryland, Virginia, and West Virginia. In response,

Transource Energy, the parent of Transource PA, submitted “Project 9A.” The IEC Project is a major component of Project 9A.

18. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM’s 2014/15 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which includes the IEC Project.

19. On November 2, 2016, PJM and Transource Energy executed a Designated Entity Agreement. FERC approved the Designated Entity Agreement on January 12, 2017, at Docket No. ER17-349-000. Pursuant to Schedule E of the FERC-approved Designated Entity Agreement, Transource PA is responsible for the construction, ownership, maintenance, and operation of the Pennsylvania portion of the IEC Project. Under the same agreement, Transource PA’s Maryland affiliate, Transource Maryland, LLC (“Transource MD”), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the IEC Project.

20. Pursuant to Schedule 6 of PJM’s Amended and Restated Operating Agreement and as stated in the Designated Entity Agreement, Transource PA and Transource MD are required to complete the IEC Project by June 1, 2020.

21. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed IEC Project as identified by PJM, and the obligation of Transource PA and Transource MD to complete the IEC Project are provided in Attachment 2 to the IEC-West Siting Application and in the direct testimonies of Mr. Ali and Mr. McGlynn accompanying the IEC-West Siting Application, Transource PA Statement Nos. 2 and 3.

III. DESCRIPTION OF THE PROJECT

22. The IEC Project as approved by PJM involves: (i) construction of two new substations in Pennsylvania, namely the Rice Substation and Furnace Run Substation, and (ii) construction of the Pennsylvania portion of two new overhead double-circuit 230 kV interstate transmission lines, namely the Rice-Ringgold 230 kV Transmission Line (the IEC-West Project) and the Furnace Run-Conastone 230 kV Transmission Line (the IEC-East Project), and associated structures, equipment, and other facilities necessary to operate the transmission lines.

23. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 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 the IEC-West Project and is the subject of this Application.

24. Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania. The proposed route for the IEC-West Project was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the siting team chose Alternative Route C for transmission line associated with the IEC-West Project.

25. The Pennsylvania portion of the IEC-West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the IEC-West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation.

26. A map of the proposed IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application.

27. A detailed explanation of the siting analysis and selection of the proposed route for the IEC-West Project is provided in Attachment 3 to the IEC-West Siting Application and explained in the direct testimony of Mr. Barry A. Baker accompanying the IEC-West Siting Application, Transource PA Statement No. 4.

28. The Rice-Ringgold 230 kV Transmission Line associated with the IEC-West Project will be a 230 kV double-circuit transmission line. The Pennsylvania portion of the new IEC-West Project will largely consist of tubular steel monopole and multi-pole structures but steel lattice structures may be used in certain areas to better accommodate topographical, construction, or land use constraints. An engineering description of Rice-Ringgold 230 kV Transmission Line is provided in Attachment 4 to the IEC-West Siting Application.

29. Subject to the Commission's approval, construction of the IEC-West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of June 1, 2020.

IV. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

30. The service to be furnished by Transource PA through the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the IEC-West Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

31. A certain portion of the route selected for the IEC-West Project crosses a tract of land located at Springview Drive, Chambersburg, Franklin County, Pennsylvania 17202 (Springview Drive Property), a tract of land located at New Franklin Road, Chambersburg,

Franklin County, Pennsylvania 17202 (New Franklin Road Property), a tract of land located at Church Road, Chambersburg, Franklin County, Pennsylvania 17202 (Church Road Property), a tract of land located at 4720 McKenzie Road, Chambersburg, Franklin County, Pennsylvania 17202 (4720 McKenzie Road Property), and a tract of land located at Fetterhoff Chapel Road, Chambersburg, Pennsylvania 17202 (Fetterhoff Chapel Road Property).

32. Deeds for the properties are recorded at the Franklin County Recorder of Deeds Office, Franklin County, Pennsylvania Deed Book 1315, Page 570 (Springview Drive Property), Deed Book 1232, Page 579 (New Franklin Road Property), Deed Book 1224, Page 629 (Church Road Property), Deed Book 988, Page 599 (4720 McKenzie Road Property) and Deed Book 988, Page 599 (Fetterhoff Chapel Road Property) and copies of said recorded deeds are attached hereto as Attachment A.

33. The name and mailing address of the owner of record of said tracts of land is Willis M. Leshner Partnership, 1153 Swamp Fox Road, Chambersburg, Pennsylvania 17202.

34. Transource PA desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 230 kV transmission line associated with the IEC-East Project to transmit electric energy for light, heat, and power. See, direct testimony of Mr. Thomas Schaffer, IEC-West Siting Application, Transource PA Statement No. 6 regarding an explanation of the acquisition of right-of-ways and easements.

35. The right-of-way for the IEC-West Project will be approximately 130 feet but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code (“NESC”) clearances.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

37. Maps depicting the proposed right-of-ways across the Willis M. Leshner Partnership properties are attached hereto as Attachment B.

38. Transource PA currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner. Accordingly, Transource PA herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through Transource PA's proposed exercise of the power of eminent domain for the IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

39. Transource PA remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with Willis M. Leshner Partnership and, thereby, avoid the need to condemn a right-of-way across the property. However, given the construction schedule and in-service date for the proposed IEC-West Project, it is necessary for Transource PA to seek Commission approval to exercise the power of eminent domain in order to ensure that the IEC-West Project is constructed and operational by the in-service date. In the event that Willis M. Leshner Partnership and Transource PA reach an agreement for the easement and right-of-way needed, Transource PA will withdraw the eminent domain application.

V. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 27, 2017, Transource PA filed the IEC-West Siting Application, which was docketed with the Commission at Docket No. A-2017-2640200. Therein, Transource

PA is requesting approval to site and construct the 230 kV transmission line associated with the IEC-West Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for IEC-West Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Transource PA is serving a complete copy of the IEC-West Siting Application, together with the accompanying Attachments and Testimony, upon Willis M. Leshner Partnership, who is/are the record owner(s) of the property that Transource PA seeks to acquire by the exercise of the power of eminent domain.

42. Also contemporaneously herewith, Transource PA also is separately filing 132 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed IEC-West Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.

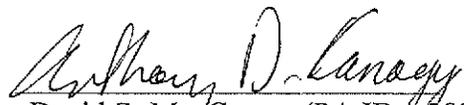
43. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that these related proceedings be consolidated together with the IEC-West Siting Application at Docket No. A-2017-2640200 and the IEC-East Siting Application at Docket No. A-2017-2640195 for purposes of hearings, if necessary, and decision.²

² Additionally, the March 28, 2018 Procedural Order issued in this proceeding indicates that any future filed condemnation applications related to the Siting Applications will be consolidated with the Siting Applications pursuant to 52 Pa. Code § 57.75

VI. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Independence Energy Connection-West and East Project Siting Application at Docket Nos. A-2017-2640200 and A-2017-2640195; (2) consolidate this Application for approval of the exercise of the power of eminent domain with the 132 other Condemnation Applications contemporaneously filed herewith; and (3) find and determine that the service to be furnished by Transource Pennsylvania, LLC through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Respectfully submitted,



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Hector Garcia (VA ID # 48304)
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E-mail: akanagy@postschell.com
E-mail: lberkstresser@postschell.com

Date: May 15, 2018

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT A

12,130.20
12,130.20

14764
THIS DEED

made this 25th day of October, 1996, between Christian H. Miller and Michael H. Miller, Executors of the Last Will and Testament of Christ C. Miller, Late of Waynesboro, Franklin County, Pennsylvania, Deceased, GRANTORS, AND Willis H. Leisher Partnership, a partnership, having its principal place of business at 1153 Swamp Fox Road, Chambersburg, Franklin County, Pennsylvania, GRANTEE,

WITNESSETH THAT, WHEREAS, Christ C. Miller, late of Waynesboro, Franklin County, Pennsylvania, deceased, was seized in fee of certain real estate hereinafter described, lying and being situate in Guilford Township, Franklin County, Pennsylvania, and being so thereof seized died testate on November 26, 1988; and,

WHEREAS, following the death of the decedent his Last Will and Testament, dated February 11, 1988, was duly probated before the Register of Wills of Franklin County, Pennsylvania, where the same may be found of record among the records of said Register of Wills in Will Book Volume 118, Page 288, in which Will he appointed the above-named Grantors as Executors to whom Letters Testamentary were issued by the Register of Wills of Franklin County, Pennsylvania, on December 16, 1988.

NOW, THEREFORE, WITNESSETH that for and in consideration of the sum of one million, two hundred thirteen thousand, twenty (\$1,213,020.00) dollars, in hand paid, the receipt whereof is

Amount of PA Realty Transfer Tax Paid \$12,130.20

00.00
10-29-96

hereby acknowledged, the said Grantors, do hereby grant and convey, in fee simple, to said Grantee,

ALL the following described three (3) tracts of real estate lying and being situate in Guilford Township, Franklin County, Pennsylvania, bounded and described as follows:

TRACT NO. 1: BEGINNING at a set spike in Township Route 467 (Guilford Springs Road) at a corner common to the tract herein conveyed and Tract No. 2 hereinafter described; thence in Guilford Springs Road, South 56 degrees 17 minutes 58 seconds East, 660.44 feet to an existing spike; thence continuing in said road, South 56 degrees 13 minutes 20 seconds East, 472.43 feet to an existing iron pin at lands now or formerly of Richard E. and Martha E. Hess; thence by said lands of Hess, South 24 degrees 17 minutes 38 seconds West, 1,152.78 feet to an existing iron pin in Township Route 800 (New Franklin Road); thence in said road and continuing by lands of Hess, North 58 degrees 39 minutes 50 seconds East, 421.56 feet to an existing nail in said road at lands now or formerly of Timothy J. and Janet L. Hess; thence by said lands of Timothy J. and Janet L. Hess, South 11 degrees 11 minutes 42 seconds West, 216.25 feet to an existing iron pin; thence continuing by the same, South 79 degrees 03 minutes 24 seconds East, 179.83 feet to an existing iron pin at lands now or formerly of Robert Helman, Jr. and Helen E. Helman; thence by said lands of Helman, South 11 degrees 22 minutes 57 seconds West, 508.14 feet to a set iron pin; thence continuing by the same, South 14 degrees 32 minutes 14 seconds West, 736.45 feet to an existing limestone at other lands of the Grantee herein; thence by other lands of the Grantee herein, South 41 degrees 09 minutes 33 seconds West, 1,130.94 feet to an existing limestone; thence continuing by the same, South 01 degree 24 minutes 21 seconds East, 646.50 feet to an existing limestone at a post at lands now or formerly of Robert T. Collins; thence by said lands of Collins, North 51 degrees 17 minutes 42 seconds West, 1,953.60 feet to a set iron pin in line of land of Tract No. 2 described below; thence by Tract No. 2 described below and crossing Township Route 800 (New Franklin Road), North 26 degrees 15 minutes 27 seconds East, 3,561.52 feet to a set spike in Township

Route 467 (Guilford Springs Road) at the place of beginning.

CONTAINING 133.866 acres, more or less, as shown by the survey entitled "Survey of Land Situate in Guilford Township, Franklin County, PA. for Christ C. Miller Estate", prepared by Thomas Michael Englerth, Surveying, dated May 15 and 16, 1996, and intended to be recorded among the deed records of Franklin County at the same time as the recording of this deed.

BEING part of the same real estate which Leslie H. Small and Ida B. Small, his wife, by deed dated December 9, 1950, and recorded at Franklin County Deed Book Volume 410, Page 140, conveyed to Christ C. Miller, the decedent herein.

SUBJECT, HOWEVER, to the rights-of-way and easements shown on the survey of Thomas Michael Englerth, dated May 15 and 16, 1996, referred to above.

AND SUBJECT, FURTHER, to such other rights-of-way and easements as may be found of record in the chain of title or are apparent upon inspection of the property.

TRACT NO. 2: BEGINNING at an existing spike in the center of Township Route 425 (Lighthouse Road) at a corner common to the tract herein conveyed and lands now or formerly of Roy E. Shank; thence partly by said lands of Roy E. Shank and partly by lands of Beulah E. Shank, North 89 degrees 04 minutes 45 seconds East, 562.53 feet to an existing iron pin in line of lands of Beulah E. Shank; thence by said lands of Beulah E. Shank, South 84 degrees 28 minutes 00 seconds East, 264.00 feet to an existing iron pin at lands now or formerly of Robert K. and Louise Y. Hess; thence by said lands of Hess, South 85 degrees 16 minutes 21 seconds East, 473.92 feet to an existing limestone at lands now or formerly of Barbara J. McCleary; thence by said lands of McCleary, South 85 degrees 19 minutes 49 seconds East, 749.20 feet to an existing limestone; thence continuing by the same, North 54 degrees 54 minutes 57 seconds East, 1,613.32 feet to an existing nail near the southerly edge of Township Route 467 (Guilford Springs Road); thence in said road, South 56 degrees 17 minutes 58 seconds East, 500.45 feet to a set spike in said road at a corner common to the tract herein conveyed and Tract

No. 1 described above; thence by Tract No. 1 described above and crossing Township Route 800 (New Franklin Road), South 26 degrees 15 minutes 27 seconds West, 3,561.52 feet to a set iron pin at lands now or formerly of Robert T. Collins; thence by said lands of Collins, South 25 degrees 19 minutes 08 seconds West, 452.18 feet to an existing post; thence continuing by the same and crossing Township Route 800 (New Franklin Road) and also crossing Township Route 476 (Overcash Road), North 47 degrees 10 minutes 52 seconds West, 1,585.59 feet to a point at the northerly right-of-way line of Township Route 476 (Overcash Road); thence in said road, South 41 degrees 24 minutes 45 seconds West, 24.34 feet to a set spike in the centerline of said public road; thence by the centerline of Township Route 476 (Overcash Road), North 68 degrees 52 minutes 36 seconds West, 587.46 feet to an existing spike in said road at a point where it intersects with Township Route 425 (Lighthouse Road); thence by the centerline of Township Route 425 (Lighthouse Road), North 09 degrees 12 minutes 55 seconds West, 600.00 feet to an existing spike; thence continuing by the centerline of said road, North 06 degrees 58 minutes 35 seconds West, 304.41 feet to a set spike in said road; thence continuing by the centerline of said road, North 09 degrees 31 minutes 04 seconds West, 916.67 feet to an existing spike in the centerline of said road at the place of beginning.

CONTAINING 164.368 acres, more or less, as shown by the survey entitled "Survey of Land Situate in Guilford Township, Franklin County, PA. for Christ C. Miller Estate", prepared by Thomas Michael Englerth, Surveying, dated May 15 and 16, 1996, and intended to be recorded among the deed records of Franklin County at the same time as the recording of this deed.

BEING Tract No. 1, Purparts (a) and (b) of the same real estate which Carrie M. Miller, widow, by deed dated December 31, 1942, and recorded at Franklin County Deed Book Volume 304, Page 586, conveyed to Christ C. Miller, the decedent herein.

SUBJECT, HOWEVER, to the rights-of-way and easements shown on the survey of Thomas Michael Englerth, dated May 15 and 16, 1996, referred to above.

AND SUBJECT, FURTHER, to such other rights-of-way and easements as may be found of record in the chain of title or apparent upon inspection of the property.

TRACT NO. 1: BEGINNING at a stone in the public road at lands now or formerly of John W. Rhines; thence through the center of the said public road with lands now or formerly of John W. Rhines, South $3/4$ of a degree West, 41.8 perches to a stone; thence South $25-1/2$ degrees East, 23.4 perches to a stone; thence with lands now or formerly of Thomas Horn, South 30 degrees 13 minutes West, 130.9 perches to a point in said road; thence with land now or formerly of Grant Miller Estate, North $64-1/2$ degrees West, 21.9 perches to a point; thence North $11-3/4$ degrees West, 13 perches to a stone; thence South 75 degrees West, 15.6 perches to a stone; thence South $30-1/2$ degrees West, 22.1 perches to a point; thence with land now or formerly of John W. Rhines and Claude Wingert, North 63 degrees 55 minutes West, 106.7 perches to a stone; thence with land of the said Claude Wingert, North $5-1/2$ degrees East, 23.5 perches to a stone; thence North 79 degrees West, 12 perches to a stone; thence with lands now or formerly of R. T. Criswell, North $17-1/2$ degrees East, 28.8 perches to a wild cherry; thence by same, North 47 degrees 22 minutes East, 104 perches to a white oak; thence by same, North $64-1/2$ degrees East, 37.1 perches to a white oak; thence with lands now or formerly of William Ferguson's heirs and John W. Rhines, South $84-1/4$ degrees East, 92.1 perches to a stone in the public road the place of beginning. CONTAINING 172 acres and 39 perches, neat measure, more or less.

BEING Tract No. 6 of the same real estate which Carrie M. Miller, widow, by deed dated December 31, 1942, and recorded at Franklin County Deed Book Volume 304, Page 586, conveyed to Christ C. Miller, the decedent herein.

SUBJECT, HOWEVER, to such rights-of-way and easements as may be found of record in the chain of title or apparent upon inspection of the property.

AND the said Grantors do hereby covenant with the said Grantee, its successors and assigns, that said Grantors have not, at any time heretofore, done or suffered any act, matter or

thing whatsoever whereby the said premises hereby granted and conveyed, or any part thereof, is, or can be, impeached or encumbered in title, estate, or otherwise howsoever.

IN WITNESS WHEREOF, the said Grantors have hereunto set their hands and seals the day and year first above written.

Sealed and delivered in the presence of

[Signature] Christian H. Miller (SEAL)
Christian H. Miller

[Signature] Michael M. Miller (SEAL)
Michael M. Miller

Executors of the Last Will and Testament of Christ C. Miller, Deceased

I hereby CERTIFY that this document is recorded in the Recorder's Office of Franklin County, Pennsylvania.



[Signature]
Linda Miller
Recorder of Deeds

GRANT TRANSFER TAX

Chambersburg School District
Borough Borough
Union Deposit Supervisors
Amount Of Tax Received 6,065.00
as on Deeds Recollection
Linda Miller Recorder

RECORDED 1651

OCT 25 10 59 AM '96

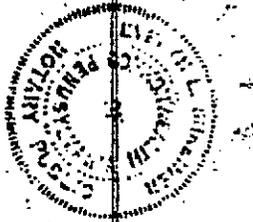
LINDA MILLER
RECORDER OF DEEDS
FRANKLIN COUNTY

COPY

COMMONWEALTH OF PENNSYLVANIA:
: SS
COUNTY OF FRANKLIN :

On this, the 25th day of October, 1996, before me, a Notary Public, personally appeared Christian H. Miller and Michael M. Miller, Executors of the Last Will and Testament of Christ C. Miller, Deceased, known to me (or satisfactorily proven) to be the persons whose names are subscribed to the within instrument, and acknowledged that they executed the same in the capacity therein stated for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.



COPY
Evelyn L. Shreiner
Title: Notary Public
My commission expires: Feb 11, 1997
I maintain an office in: _____

NOTARIAL SEAL
Evelyn L. Shreiner, Notary Public
Baro of Chambersburg, Franklin Co
My Commission Expires Feb. 11, 1997

I hereby certify that the precise address of the Grantee herein is 1153 Swamp Fox Road
Chambersburg, PA 17201

October 25, 1996
Washington
Agent/Attorney for Grantee

1804
1804

42558

THIS DEED

MADE the 23rd day of September in the year nineteen hundred and ninety-four (1994)

BETWEEN MICHAEL M. MILLER, single, of 433 Clayton Avenue, Waynesboro, Pennsylvania, 17268,

GRANTOR

AND THE WILLIS M. LESHER PARTNERSHIP, a Partnership organized under the laws of the Commonwealth of Pennsylvania, and having its principal place of business at 1153 Swamp Fox Road, Chambersburg, Franklin County, Pennsylvania,

GRANTEE

016546
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
PAID BY TRANSFER SYSTEM
RECEIVED
00400

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
PAID BY TRANSFER SYSTEM
RECEIVED
00400
S F S 0 1 0

WITNESSETH that in consideration of ONE HUNDRED EIGHTY-THOUSAND FOUR HUNDRED (\$180,400.00) DOLLARS, in hand paid, the receipt whereof is hereby acknowledged, the said Grantor does hereby grant and convey in fee simple to said Grantee

ALL the following described real estate lying and being situate in Guilford Township, Franklin County, Pennsylvania, bounded and limited as follows:

BEGINNING at a stone and steel in Township Road 496; thence in said road, North 52 1/2 degrees West 35.2 rods to an iron pin at post at land of Barnhart; thence by the latter, North 59 degrees East 12.8 rods to an iron pin; thence by the same and land of Robert and Strite, North 49 degrees West 45.2 rods to a stone in Legislative Route No. 28026; thence in said road, North 68 degrees 23 minutes East 108.3 rods to a steel in said road; thence by lands of Willdeson, North 7 1/4 degrees West 16.45 rods to a steel and stone; thence by the same and lands of Garber, North 63 degrees 50 minutes East 59.5 rods to a stone at land of College; thence by the latter, South 38 1/2 degrees East 34.1 rods to a stone at land of Doyle; thence by land of Doyle and land of Baker and land of Ricker, South 71 3/4 degrees West 26.84 rods to a point; thence by Ricker, South 39 degrees East 20 rods to a point; thence by the same and land of Baker and land of Doyle, North 71 3/4 degrees East 26.84 rods to a stone at land of College; thence by the latter and land of Walker, South 38 1/2 degrees East 41.2 rods to a steel and stone at land of Martin; thence by the latter, South 67 degrees 55 minutes West 173.1 rods to a stone and steel in said Township Road 496, the place of **BEGINNING**. **CONTAINING** 82 acres and 90 perches, neat measure, as shown by draft of John R. McHirov, C.S., dated January 6, 1914.

BEING THE SAME real estate which Christ C. Miller, Executor of the Last Will and Testament of Evelyn F. Miller, deceased, and Christ C. Miller, in his own right, and Christ H. Miller, by Deed of Distribution dated July 29, 1987, and recorded among the Deed Records of Franklin County, Pennsylvania, in Deed Book Volume 994, Page 237, conveyed to Michael M. Miller, Grantor herein.

AND the said Grantor will warrant specially the property heraby conveyed.

IN WITNESS WHEREOF said Grantor hereunto sets his hand and seal, the day and year first above written.

Witness:

Evelyn L. Shreiner

Michael M. Miller (SEAL)
Michael M. Miller

COPY
ACKNOWLEDGEMENT

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF FRANKLIN :

On this 13th day of September, 1994, before me, a Notary Public, the undersigned officer, personally appeared MICHAEL M. MILLER, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged the foregoing deed to be his act and deed, and desired the same to be recorded as such.

Witness my hand and official seal, the day and year aforesaid.

CHAMBERSBURG
Chambersburg School District
Borough
Shirley Supervisors
Amount Of Tax Received 912.00
Tax on Deeds Resolution
David W. Brown

Evelyn L. Shreiner

NOTARIAL SEAL
EVELYN L. SHREINER, Notary Public
Borough of Chambersburg, Franklin Co.
My Commission Expires Feb. 11, 1997



I hereby certify that the Grantee's precise residence and complete post office address is:

1153 Swamp Fox Road
Chambersburg, PA 17201

Witness my hand this 23RD day of SEPTEMBER, 1994.

Norm E. Laker

I hereby CERTIFY that this document is recorded in the Recorder's Office of Franklin County, Pennsylvania.



David W. Bowers
David W. Bowers
Recorder of Deeds
COPY

RECORDED
SEP 23 AM 11:19
FRANKLIN COUNTY

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF FRANKLIN :

RECORDED in the Office for Recording of Deeds in and for the said County in Deed Book _____, Page _____.

WITNESS my hand and seal of office, this ____ day of _____, Anno Domini, 19__.

5475.40
5475.40

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE

REALTY
TRANSFER JULIUM



900.00

RE-1167

37523

THIS DEED

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE

900.00



REALTY
TRANSFER JULIUM
TAX

661118

made this 19th day of July, 1994, between Christian N. Miller and Michael N. Miller, Executors of the Last Will and Testament of Christ C. Miller, Late of Waynesboro, Franklin County, Pennsylvania, Deceased, GRANTORS, AND Willis M. Lesher Partnership, a Partnership organized under the laws of the Commonwealth of Pennsylvania, and having its principal place of business at 1153 Swamp Fox Road, Chambersburg, Franklin County, Pennsylvania, GRANTEE,

WITNESSETH THAT, WHEREAS, Christ C. Miller, late of Waynesboro, Franklin County, Pennsylvania, deceased, was seized in fee of certain real estate hereinafter described, lying and being situate in Gullford Township, Franklin County, Pennsylvania, and being so thereof seized died testate on November 26, 1988; and,

WHEREAS, following the death of the decedent his Last Will and Testament, dated February 11, 1988, was duly probated before the Register of Wills of Franklin County, Pennsylvania, where the same may be found of record among the records of said Register of Wills in Will Book Volume 118, Page 288, in which Will he appointed the above-named Grantors as Executors to whom Letters Testamentary were issued by the Register of Wills of Franklin County, Pennsylvania, on December 16, 1988.

NOW, THEREFORE, WITNESSETH that for and in consideration of the sum of five hundred forty-seven thousand, five hundred forty (\$547,540.00) dollars, in hand paid, the receipt whereof is

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE

900.00



REALTY
TRANSFER JULIUM
TAX

661118



900.00

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF REVENUE
 REALTY TRANSFER JUL 1978
 TAX

900.00

108110

hereby acknowledged, the said Grantors, do hereby grant and convey, in fee simple, to said Grantee,

ALL the following described two (2) tracts of real estate lying and being situate in Guilford Township, Franklin County, Pennsylvania, bounded and described as follows:

TRACT NO. 1: BEGINNING at an existing spike in the centerline of T-495 (Church Road) at a corner common to the lands herein conveyed and lands now or formerly of H. Kenneth and Anita F. Kipe; thence by said lands of Kipe, North 59 degrees 34 minutes 15 seconds West, 415.29 feet to an existing iron pin; thence continuing partly by said lands of Kipe and partly by lands now or formerly of George R. and Julia A. Skelly, North 57 degrees 55 minutes 14 seconds West, 2,411.02 feet to a set iron pin at lands now or formerly of Isaac J. and Hazel R. Hostetter; thence by said lands of Hostetter, North 45 degrees 00 minutes 00 seconds West, 4.95 feet to a set iron pin; thence by the same, North 40 degrees 03 minutes 12 seconds East, 149.96 feet to a set iron pin at lands now or formerly of I. Chester and Martha M. Horst; thence by said lands of Horst, North 38 degrees 15 minutes 00 seconds East, 923.70 feet to an existing iron pin; thence partly by said lands of Horst, partly by lands now or formerly of Wilber L. and Elaine J. Patterson, and partly by lands now or formerly of Lamar J. and Lisa M. Diller, North 58 degrees 45 minutes 00 seconds East, 907.70 feet to a set railroad spike in the centerline of S.R. 2020 (New Franklin Road); thence with the centerline of said road the following courses and distances: North 89 degrees 39 minutes 59 seconds East, 343.99 feet to an existing railroad spike; South 89 degrees 31 minutes 05 seconds East, 768.15 feet to a set railroad spike; South 88 degrees 33 minutes 55 seconds East, 138.60 feet to an existing railroad spike; and North 83 degrees 38 minutes 33 seconds East, 194.70 feet to an existing iron pin at other lands of the Estate of Christ C. Miller, being Tract No. 2 described below; thence by said Tract No. 2 described below, South 54 degrees 07 minutes 15 seconds East, 315.60 feet to a set iron pin; thence continuing by the same, South 22 degrees 48 minutes 29 seconds West, 911.00 feet to a set iron pin; thence continuing by the same, South 05 degrees 29 minutes 34 seconds East, 267.50 feet to a set iron pin at lands now or

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF REVENUE
 REALTY TRANSFER JUL 1978
 TAX

975.40

208710

formerly of Edna S. and Charles A. Fox; thence by said lands of Fox, South 24 degrees 53 minutes 58 seconds West, 1,118.55 feet to a set iron pin at the westerly edge of T-495 (Church Road); thence in said road, South 24 degrees 53 minutes 58 seconds West, 510.00 feet to a set spike; thence continuing in said road, South 24 degrees 21 minutes 37 seconds West, 894.91 feet to an existing spike in said road at the place of beginning.

CONTAINING 175.42 acres, more or less, as shown by the survey entitled "Survey of Land Situate in Guilford Township, Franklin County, PA. for Christ C. Miller Estate", prepared by Thomas Michael Englerth, Surveying, dated April 27, 1994, and intended to be recorded among the deed records of Franklin County at the same time as the recording of this deed.

BEING Tract No. 5, Purparts (a) and (b) of the same real estate which Carrie R. Miller, widow, by her deed dated December 31, 1942, and recorded at Franklin County Deed Book Volume 304, Page 586, conveyed to Christ C. Miller, the decedent herein.

TRACT NO. 2: BEGINNING at an existing railroad spike in T-495 (Church Road) at a corner common to the lands herein conveyed and lands now or formerly of Edna S. and Charles A. Fox; thence by said lands of Fox, North 50 degrees 27 minutes 20 seconds West, 422.58 feet to a set iron pin at Tract No. 1 described above; thence by said Tract No. 1 described above, North 05 degrees 29 minutes 34 seconds West, 267.50 feet to a set iron pin; thence continuing by Tract No. 1, North 22 degrees 48 minutes 29 seconds East, 911.00 feet to a set iron pin; thence by the same, North 54 degrees 07 minutes 15 seconds West, 315.60 feet to an existing iron pin in the centerline of S.R. 2020 (New Franklin Road); thence with the centerline of said road, North 84 degrees 28 minutes 28 seconds East, 659.81 feet to an existing railroad spike at lands now or formerly of Wayne R. and Doris J. Best; thence by said lands of Best, South 53 degrees 35 minutes 04 seconds East, 311.86 feet to a point in T-495 (Church Road); thence in said road, South 26 degrees 43 minutes 50 seconds West, 280.56 feet to an existing railroad spike; thence continuing in said road, South 20 degrees 43 minutes 23 seconds West, 511.99 feet to an existing railroad spike; thence continuing in said road, South 26 degrees 02 minutes 45 seconds West, 789.66 feet to an existing railroad spike in said road at the place of beginning.

CONTAINING 20.13 acres, more or less, as shown by the survey entitled "Survey of Land Situate in Guilford Township, Franklin County, PA. for Christ C. Miller Estate", prepared by Thomas Michael Englerth, Surveying, dated April 27, 1994, and intended to be recorded among the deed records of Franklin County at the same time as the recording of this deed.

BEING the same real estate which Annie H. Maister, widow, and Pauline H. Stull and Earl H. Stull, Jr., by deed dated March 25, 1964, and recorded at Franklin County Deed Book Volume 580, Page 760, conveyed to Christ C. Miller, the decedent herein.

THE ABOVE two (2) tracts of real estate are conveyed SUBJECT to the rights-of-way and easements shown on the survey of Thomas Michael Englerth, dated April 22, 1994, referred to above, AND SUBJECT, FURTHER, to such other rights-of-way and easements as may be found of record in the chain of title or are apparent upon inspection of the property.

AND the said Grantors do hereby covenant with the said Grantee, its successors and assigns, that said Grantors have not, at any time heretofore, done or suffered any act, matter or thing whatsoever whereby the said premises hereby granted and conveyed, or any part thereof, is, or can be, impeached or encumbered in title, estate, or otherwise howsoever.

IN WITNESS WHEREOF, the said Grantors have hereunto set their hands and seals the day and year first above written.

Sealed and delivered in the presence of

Evelyn S. Shreiner

Christian H. Miller (SEAL)
Christian H. Miller

-4-

Evelyn L. Shreiner

Michael M. Miller

(SEAL)

Executors of the Last Will
and Testament of Christ C.
Miller, Deceased

COMMONWEALTH OF PENNSYLVANIA:
: SS
COUNTY OF FRANKLIN :

On this, the 19th day of July, 1994, before me,
a Notary Public, personally appeared Christian H. Miller and
Michael M. Miller, Executors of the Last Will and Testament of
Christ C. Miller, Deceased, known to me (or satisfactorily prov-
en) to be the persons whose names are subscribed to the within
instrument, and acknowledged that they executed the same in the
capacity therein stated for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official
seal.

Evelyn L. Shreiner

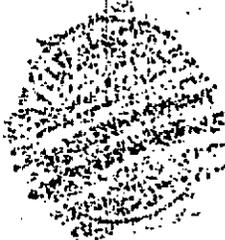
Title: _____

My commission expires: _____

I maintain an office in: _____

NOTARIAL SEAL
EVELYN L. SHREINER, Notary Public
Borough of Chambersburg, Franklin Co.
My Commission Expires Feb 11, 1997

RECORDED
89 JUL 19 P 1:38
DAVID W. BOWLES
RECORDER OF DEEDS
FRANKLIN COUNTY



10
14

THIS DEED 1987 3

MADE THE 26th day of May, 1987, between John C. McKenzie and Hazel P. McKenzie, his wife, Lois McKenzie Horst, Joann McKenzie Brechbill, Anna McKenzie Harry, Marjorie McKenzie Piper, and J. Craig McKenzie, of 5038 Fetterhoff Chapel Road, Chambersburg, Franklin County, Pennsylvania, GRANTORS, AND Willis M. Leshar, Melvin R. Leshar, Kenneth A. Leshar, Ronald L. Bowman and Duane E. Leshar, Partners, trading and doing business as Willis M. Leshar Partnership, whose address is 1131 Swamp Fox Road, Chambersburg, Franklin County, Pennsylvania, GRANTEES.

Witnesseth, that in consideration of the sum of one million thirty thousand (\$1,030,000.00) dollars, in hand paid, the receipt whereof is hereby acknowledged, the said grantors do grant and convey, in fee simple, to said grantees,

ALL that certain real estate lying and being situate in Franklin County, Pennsylvania, bounded and described as follows:

TRACT NO. 1: Located in Guilford Township and BEGINNING at a stone in the public road leading from Fetterhof Chapel to State Highway Route 316 at lands now or formerly of Ben Helman; thence with the same, South 43 degrees East 25.8 perches to a post; thence further along the same, North 41-3/4 degrees East 50.3 perches to a stone; thence further along the same, South 49-1/2 degrees East 50.9 perches to a post at the easterly side of a private lane, which post is also in line of Tract No. 2 hereinafter described; thence along Tract No. 2, South 56-1/2 degrees East (likely South 55 degrees 30 minutes East) 16.8 perches to a point (probably a stone); thence further along Tract No. 2, South 54-1/4 degrees East (likely South 54-1/2 degrees East) 38 perches to an iron pin, formerly a stone, of lands now or formerly of Jere George and prior thereto of Ed Etter; thence along the latter, South 34-1/4 degrees West 46.5 perches to a stone; thence further along the same, South 32-3/4 degrees East 14.1 perches to a stone at lands formerly of David Wagaman; thence along the latter, South 52-7/8 degrees West 120 perches to a stone; thence further along the same and also lands now or formerly of Brake Slyder, North 44-1/8 degrees West 104 perches to a post at lands now or formerly of Paul Wilderson; thence along the latter, North 43-3/4 degrees East 100.6 perches to a stone; thence further along the same, North 43 degrees West 26.2 perches to a stone in the aforesaid public road; thence in said public road, North 58-3/4 degrees East 1.25 perches to a stone in said road, the place of beginning, and containing 112 acres and 20 perches, neat measure, as resurveyed May 9, 1905 by John R. McElroy.

TRACT NO. 2: Located in Guilford Township and BEGINNING at a corner common to lands now or formerly of Ben Helman and Tract No. 1 above described, said corner being marked with a stone at a private lane; thence along lands now or formerly of Ben Helman, North 47 degrees East 14.35 perches to a cedar tree; thence along the same, North 60-1/2 degrees East 24.88 perches to an iron pin at corner; thence South 11 degrees 15 minutes East 13.9 perches to an iron pin; thence North 71 degrees East 9.08 perches to an iron pin in the public road leading from Altenwald to Fetterhof Chapel; thence in said road and along lands now or formerly of Jere George, South 12-3/4 degrees East 13.45 perches to a stone in said road; thence further in said road, South 12 degrees 7 minutes East 28.95 perches to an iron pin in said public road; thence leaving said public road and along lands now or formerly of Edward Etter Estate, South 76-3/4 degrees West 7.2 perches to an iron pin at Tract No. 1 hereinbefore described; thence along Tract No. 1, North 54-1/2 degrees West 38 perches to a stone; thence further along Tract No. 1, North 55 degrees 5 minutes West 18.05 perches (possibly 16.8 perches) to a stone, the place of beginning, and containing 8 acres and 105 perches, neat measure, as shown by draft of John R. Acherton, C.S., dated Dec. 30, 1937.

BEING Tracts Nos. 1 and 2 which Ida H. Byers, widow, by her dead dated November 17, 1969, recorded in the Deed Records of Franklin County, Pennsylvania, Deed Book Volume 644, Page 945, conveyed to John C. McKenzie and Hazel P. McKenzie, his wife, who, by their deeds dated

December 31, 1975, recorded in Deed Book Volume 721, Page 244, and April 30, 1976, recorded in Deed Book Volume 725, Page 492, conveyed their interest in the said tracts to their five children, Lois McKenzie Herat, Joann McKenzie Brechbill, Anna McKenzie Harry, Marjorie McKenzie Piper, and J. Craig McKenzie, grantors herein.

TRACT NO. 3: Located in Quincy Township and BEGINNING at a stone on line of lands now or formerly of D. H. Barnett, which stone is also corner of lands now or formerly of John A. Hafer; thence by lands now or formerly of John A. Hafer, North 43-3/4 degrees West 86.65 perches to a stone; thence by lands now or formerly of Wm. Sollenberger, North 48-1/4 degrees East 46.3 perches to a stone; thence by the same, North 44-1/2 degrees West 15.7 perches to a stone in a public road; thence through said public road by lands now or formerly of Joe D. Wingert, North 48-1/2 degrees East 48.8 perches to a stone in said public road; thence by lands now or formerly of Joe D. Wingert, South 72-3/4 degrees East 77 perches to a stone; thence by land now or formerly of McLellan Snider, South 10-3/4 degrees West 47-3/4 perches to a stone; thence by land now or formerly of J. A. Snider Heirs, South 19 degrees East 76 perches to a stone; thence by land now or formerly of Elam Hess, South 36 degrees West 41 perches to a point at corner of lands now or formerly of D. H. Barnett; thence by lands now or formerly of D. H. Barnett, North 51 degrees 21 minutes West 74.65 perches to a point; thence by same, South 47-1/4 degrees West 5.9 perches to a stone at corner of lands now or formerly of John A. Hafer, the place of beginning. Containing 88 acres and 75 perches, neat measure.

BEING the same real estate which the executors of the last will and testament of John E. Reichard, deceased, by their deed dated July 20, 1938, recorded in the Deed Records of Franklin County, Pennsylvania, Deed Book Volume 274, Page 102, conveyed to John C. McKenzie, one of the grantors herein.

TRACT NO. 4: Located in Quincy Township and BEGINNING at an iron pin at the Northwest corner of the tract, thence by lands now or formerly of John C. and Hazel P. McKenzie, South 5 degrees 20 minutes East 74.65 rods to an iron pin; thence by lands now or formerly of Fred Blue, South 35-1/4 degrees West 21.65 rods to a point; thence South 44 degrees 53 minutes East 23.8 rods to a point; thence by lands now or formerly of Junior Bingaman, North 41-3/4 degrees West 32.5 rods to a point; thence by the same, North 43-1/2 degrees West 46.6 rods to a stone; thence by land now or formerly of Albert Snyder and other lands now or formerly of John C. and Hazel P. McKenzie, North 47 degrees East 34.4 rods to the place of beginning. Containing 19 acres and 33 perches, neat measure.

TRACT NO. 5: Located in Quincy Township and BEGINNING at an iron pin on or near the middle of the public road, thence by land now or formerly of Albert Snyder, North 47 degrees East 58.4 rods to an iron pin; thence by lands of Tract No. 4, South 43-3/4 degrees East 12 feet to a fence post, thence by lands now or formerly of Junior Bingaman, South 47 degrees West 58.4 rods to a stone on or near the middle of the public road, thence on said road, North 44 degrees West 12 feet to the place of beginning. Containing 42 square perches.

BEING the same two tracts of real estate which Christ C. Miller and Evelyn F. Miller, his wife, by their deed dated August 29, 1960, recorded in the Deed Records of Franklin County, Pennsylvania, Deed Book Volume 562, Page 214, conveyed to John C. McKenzie and Hazel P. McKenzie, his wife, two of the grantors herein.

TRACT NO. 6: Located in Quincy Township. On the North by lands now or formerly of Michael Helman, Amos Rotz, Charles Fox; on the East by lands now or formerly of Lydia Wildeson and Elmer Young; on the South and West by public road, containing 155 acres, 65 perches, more or less.

BEING the same real estate which the Sheriff of Franklin County, Pennsylvania, by deed dated October 7, 1946, recorded in Franklin County Sheriff's Deed Book Volume 3, Page 273, conveyed to John C. McKenzie and

Hazel P. McKenzie, his wife, who, by deeds dated Dec. 30, 1976, recorded in Vol. 736, Page 706, and Jan. 3, 1977, recorded in Vol. 736, Page 784, conveyed interests in the said tract to their five children, hereinbefore named, and all of whom are grantors herein.

AND the said grantors will warrant generally the property hereby conveyed.

In witness whereof, said grantors have hereunto set their respective hands and seals, the day and year first above written.

Witness:

Elizabeth A. Summers John C. McKenzie (SEAL)
Hazel P. McKenzie (SEAL)
Lois McKenzie Horst (SEAL)
Joann McKenzie Brechbill (SEAL)
Anna McKenzie Harry (SEAL)
Marjorie McKenzie Piper (SEAL)
J. Craig McKenzie (SEAL)

STATE OF PENNSYLVANIA)
 COUNTY OF FRANKLIN) SS:

On this 27th day of May, 1987, before me, a Notary Public in and for said state and county, the undersigned officer, personally appeared John C. McKenzie and Hazel P. McKenzie, his wife, known to me (or satisfactorily proven), to be the persons whose names are subscribed to the within instrument, and acknowledged the foregoing deed to be their act and deed, and desired the same to be recorded as such.

Witness my hand and official seal, the day and year aforesaid.

Elizabeth A. Summers
 Notary Public



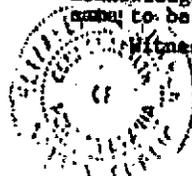
ELIZABETH A. SUMMERS, NOTARY PUBLIC
 CHAMBERSBURG ROAD, FRANKLIN COUNTY
 MY COMMISSION EXPIRES - MAY 15, 1990
 Member, Pennsylvania Association of Notaries

STATE OF PENNSYLVANIA)
 COUNTY OF FRANKLIN) SS:

On this 28th day of May, 1987, before me, a Notary Public in and for said state and county, the undersigned officer, personally appeared Lois McKenzie Horst, Joann McKenzie Brechbill, Anna McKenzie Harry, and Marjorie McKenzie Piper, known to me (or satisfactorily proven), to be the persons whose names are subscribed to the within instrument and acknowledged the foregoing deed to be their act and deed, and desired the same to be recorded as such.

Witness my hand and official seal, the day and year aforesaid.

Elizabeth A. Summers
 Notary Public



ELIZABETH A. SUMMERS, NOTARY PUBLIC
 CHAMBERSBURG ROAD, FRANKLIN COUNTY
 MY COMMISSION EXPIRES - MAY 15, 1990
 Member, Pennsylvania Association of Notaries

STATE OF New York)
COUNTY OF Westford) SS:

On this 29th day of May, 1987, before me, a Notary Public in and for said state and county, the undersigned officer, personally appeared J. Craig McKenzie, known to me (or satisfactorily proven), to be the person whose name is subscribed to the within instrument, and acknowledged the foregoing deed to be his act and deed, and desired the same to be recorded as such.

Witness my hand and official seal, the day and year aforesaid.



Patricia A. Crawley
Notary Public
STATE OF NEW YORK
WESTFORD

309,000.00
Quincy
William P. Langford Jr.
72500.00
(7,210.00)

RECORDED
MAY 31 1987
1450

COPY

I hereby certify that Grantor's precise residence and complete post office address is: 1153 Swamp Fox Road, Chambersburg, Va.

Witness my hand this 29th day of May, 1987.

REALTY TRANSFER TAX
Weymouth School District
Borough
Quincy Supervisors
Amount Of Tax Received 3605.00
Tax on Deeds Resolution
David W. Bowers Collector

Mark R. Leake

REALTY TRANSFER TAX
Chambersburg School District
Borough
Weymouth Supervisors
Amount Of Tax Received 1545.00 Each
Tax on Deeds Resolution
David W. Bowers Collector

3rd
Deed
June 1987
David W. Bowers
mr



912.57

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
HEALTH TRANSFER TAX
999.99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
HEALTH TRANSFER TAX
999.99

12603

65669

BETWEEN
John C. McKenzie and Hazel P. Mc-
Kenzie, his wife, Lois McKenzie
Horsf, Joann McKenzie Brechbill,
Anna McKenzie Harry, Marjorie Mc-
Kenzie Piper, and J. Craig Mc-
Kenzie,
GRANTORS

AND
Willis M. Leshor, Melvin R. Leshor,
Kenneth A. Leshor, Ronald L.
Boraman and Duane E. Leshor,
Partners, trading and doing
business as Willis M. Leshor
Partnership,
GRANTEES

DEED

999.99

999.99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
HEALTH TRANSFER TAX
999.99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
HEALTH TRANSFER TAX
999.99

COMMONWEALTH OF PENNSYLVANIA
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HEALTH TRANSFER TAX
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
HEALTH TRANSFER TAX
999.99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
HEALTH TRANSFER TAX
310.00

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
HEALTH TRANSFER TAX
300.10

THIS DEED 3/11/87

MADE THE 26th day of May, 1987, between John C. McKenzie and Hazel P. McKenzie, his wife, Lois McKenzie Horst, Joann McKenzie Brechbill, Anna McKenzie Harry, Marjorie McKenzie Piper, and J. Craig McKenzie, of 5038 Fetterhoff Chapel Road, Chambersburg, Franklin County, Pennsylvania, GRANTORS, AND Willis M. Leshar, Melvin E. Leshar, Kenneth A. Leshar, Ronald L. Bowman and Duane E. Leshar, Partners, trading and doing business as Willis M. Leshar Partnership, whose address is 1153 Swamp Fox Road, Chambersburg, Franklin County, Pennsylvania, GRANTEES.

Witnesseth, that in consideration of the sum of one million thirty thousand (\$1,030,000.00) dollars, in hand paid, the receipt whereof is hereby acknowledged, the said grantors do grant and convey, in fee simple, to said grantees,

ALL that certain real estate lying and being situate in Franklin County, Pennsylvania, bounded and described as follows:

TRACT NO. 1: Located in Guilford Township and BEGINNING at a stone in the public road leading from Fetterhof Chapel to State Highway Route 316 at lands now or formerly of Ben Helman; thence with the same, South 43 degrees East 25.8 perches to a post; thence further along the same, North 41-3/4 degrees East 50.3 perches to a stone; thence further along the same, South 49-1/2 degrees East 50.9 perches to a post at the easterly side of a private lane, which post is also in line of Tract No. 2 hereinafter described; thence along Tract No. 2, South 56-1/2 degrees East (likely South 55 degrees 5 minutes East) 16.8 perches to a point (probably a stone); thence further along Tract No. 2, South 54-1/4 degrees East (likely South 54-1/2 degrees East) 38 perches to an iron pin, formerly a stone, at lands now or formerly of Jere George and prior thereto of Ed Etter; thence along the latter, South 34-1/4 degrees West 46.5 perches to a stone; thence further along the same, South 32-3/4 degrees East 14.1 perches to a stone at lands formerly of David Wagaman; thence along the latter, South 52-7/8 degrees West 120 perches to a stone; thence further along the same and also lands now or formerly of Brake Slyder, North 44-1/8 degrees West 104 perches to a post at lands now or formerly of Paul Wilderson; thence along the latter, North 43-3/4 degrees East 100.6 perches to a stone; thence further along the same, North 43 degrees West 26.2 perches to a stone in the aforesaid public road; thence in said public road, North 58-3/4 degrees East 1.25 perches to a stone in said road, the place of beginning, and containing 112 acres and 20 perches, neat measure, as resurveyed May 9, 1905 by John R. McElroy.

TRACT NO. 2: Located in Guilford Township and BEGINNING at a corner common to lands now or formerly of Ben Helman and Tract No. 1 above described, said corner being marked with a stone at a private lane; thence along lands now or formerly of Ben Helman, North 47 degrees East 14.35 perches to a cedar tree; thence along the same, North 60-1/2 degrees East 24.88 perches to an iron pin at corner; thence South 11 degrees 15 minutes East 13.9 perches to an iron pin; thence North 71 degrees East 9.08 perches to an iron pin in the public road leading from Altenwald to Fetterhof Chapel; thence in said road and along lands now or formerly of Jere George, South 12-3/4 degrees East 13.45 perches to a stone in said road; thence further in said road, South 12 degrees 7 minutes East 28.95 perches to an iron pin in said public road; thence leaving said public road and along lands now or formerly of Edward Etter Estate, South 76-3/4 degrees West 7.2 perches to an iron pin at Tract No. 1 hereinbefore described; thence along Tract No. 1, North 54-1/2 degrees West 38 perches to a stone; thence further along Tract No. 1, North 55 degrees 5 minutes West 18.05 perches (possibly 16.8 perches) to a stone, the place of beginning, and containing 8 acres and 105 perches, neat measure, as shown by draft of John H. Atherton, C.S., dated Dec. 30, 1937.

BEING Tracts Nos. 1 and 2 which Ida H. Byers, widow, by her deed dated November 17, 1969, recorded in the Deed Records of Franklin County, Pennsylvania, Deed Book Volume 644, Page 945, conveyed to John C. McKenzie and Hazel P. McKenzie, his wife, who, by their deeds dated

December 31, 1975, recorded in Deed Book Volume 721, Page 264, and April 30, 1976, recorded in Deed Book Volume 725, Page 492, conveyed their interest in the said tracts to their five children, Lois McKenzie Horst, Joann McKenzie Brachbill, Anna McKenzie Harry, Marjorie McKenzie Piper, and J. Craig McKenzie, grantors herein.

TRACT NO. 3: Located in Quincy Township and BEGINNING at a stone on line of lands now or formerly of D. H. Barnett, which stone is also corner of lands now or formerly of John A. Hafer; thence by lands now or formerly of John A. Hafer, North 43-3/4 degrees West 86.65 perches to a stone; thence by lands now or formerly of Wm. Sollenberger, North 48-1/4 degrees East 46.3 perches to a stone; thence by the same, North 44-1/2 degrees West 15.7 perches to a stone in a public road; thence through said public road by lands now or formerly of Joe D. Wingert, North 48-1/2 degrees East 48.8 perches to a stone in said public road; thence by lands now or formerly of Joe D. Wingert, South 72-3/4 degrees East 77 perches to a stone; thence by land now or formerly of McClellan Snider, South 10-3/4 degrees West 47-3/4 perches to a stone; thence by land now or formerly of J. A. Snider Hairs, South 19 degrees East 76 perches to a stone; thence by land now or formerly of Elam Hess, South 36 degrees West 41 perches to a point at corner of lands now or formerly of D. H. Barnett; thence by lands now or formerly of D. H. Barnett, North 51 degrees 21 minutes West 74.65 perches to a point; thence by same, South 47-1/4 degrees West 5.9 perches to a stone at corner of lands now or formerly of John A. Hafer, the place of beginning. Containing 88 acres and 75 perches, neat measure.

BEING the same real estate which the executors of the last will and testament of John E. Reichard, deceased, by their deed dated July 20, 1938, recorded in the Deed Records of Franklin County, Pennsylvania, Deed Book Volume 274, Page 102, conveyed to John C. McKenzie, one of the grantors herein.

TRACT NO. 4: Located in Quincy Township and BEGINNING at an iron pin at the Northwest corner of the tract, thence by lands now or formerly of John C. and Hazel P. McKenzie, South 22 degrees 20 minutes East 74.65 rods to an iron pin; thence by lands now or formerly of Fred Blue, South 35-3/4 degrees West 21.65 rods to a point; thence South 44 degrees 53 minutes West 23.8 rods to a point; thence by lands now or formerly of Junior Bingham, North 41-3/4 degrees West 32.5 rods to a point; thence by the same, North 43-1/2 degrees West 46.6 rods to a stone; thence by land now or formerly of Albert Snyder and other lands now or formerly of John C. and Hazel P. McKenzie, North 47 degrees East 34.4 rods to the place of beginning. Containing 19 acres and 33 perches, neat measure.

TRACT NO. 5: Located in Quincy Township and BEGINNING at an iron pin on or near the middle of the public road, thence by land now or formerly of Albert Snyder, North 47 degrees East 58.4 rods to an iron pin; thence by lands of Tract No. 4, South 43-3/4 degrees East 12 feet to a fence post, thence by lands now or formerly of Junior Bingham, South 47 degrees West 58.4 rods to a stone on or near the middle of the public road, thence on said road, North 44 degrees West 12 feet to the place of beginning. Containing 42 square perches.

BEING the same two tracts of real estate which Christ C. Miller and Evelyn F. Miller, his wife, by their deed dated August 29, 1960, recorded in the Deed Records of Franklin County, Pennsylvania, Deed Book Volume 542, Page 214, conveyed to John C. McKenzie and Hazel P. McKenzie, his wife, two of the grantors herein.

TRACT NO. 6: Located in Quincy Township. On the North by lands now or formerly of Michael Helman, Amon Rotz, Charles Fox; on the East by lands now or formerly of Lydia Wildeson and Elmer Young; on the South and West by public road, containing 155 acres, 65 perches, more or less.

BEING the same real estate which the Sheriff of Franklin County, Pennsylvania, by deed dated October 7, 1946, recorded in Franklin County Sheriff's Deed Book Volume 3, Page 273, conveyed to John C. McKenzie and

Hazel P. McKenzie, his wife, who, by deeds dated Dec. 30, 1976, recorded in Vol. 736, Page 706, and Jan. 3, 1977, recorded in Vol. 736, Page 784, conveyed interests in the said tract to their five children, hereinafter named, and all of whom are grantors herein.

AND the said grantors will warrant generally the property hereby conveyed.

In witness whereof, said grantors have hereunto set their respective hands and seals, the day and year first above written.

Witness:

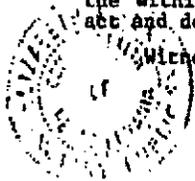
Elizabeth A. Summers John C. McKenzie (SEAL)
Hazel P. McKenzie (SEAL)
Lois McKenzie Horst (SEAL)
Joann McKenzie Brechbill (SEAL)
Anna McKenzie Harry (SEAL)
Marjorie McKenzie Piper (SEAL)
J. Craig McKenzie (SEAL)

STATE OF PENNSYLVANIA)
 COUNTY OF FRANKLIN) SS:

On this 27th day of May, 1987, before me, a Notary Public in and for said state and county, the undersigned officer, personally appeared John C. McKenzie and Hazel P. McKenzie, his wife, known to me (or satisfactorily proven), to be the persons whose names are subscribed to the within instrument, and acknowledged the foregoing deed to be their act and deed, and desired the same to be recorded as such.

Witness my hand and official seal, the day and year aforesaid.

Elizabeth A. Summers
 Notary Public



ELIZABETH A. SUMMERS, NOTARY PUBLIC
 FRANKLIN COUNTY, PENNSYLVANIA
 MY COMMISSION EXPIRES - MAY 11, 1990
 Member, Pennsylvania Association of Notaries

STATE OF PENNSYLVANIA)
 COUNTY OF FRANKLIN) SS:

On this 28th day of May, 1987, before me, a Notary Public in and for said state and county, the undersigned officer, personally appeared Lois McKenzie Horst, Joann McKenzie Brechbill, Anna McKenzie Harry, and Marjorie McKenzie Piper, known to me (or satisfactorily proven), to be the persons whose names are subscribed to the within instrument and acknowledged the foregoing deed to be their act and deed, and desired the same to be recorded as such.

Witness my hand and official seal, the day and year aforesaid.

Elizabeth A. Summers
 Notary Public



ELIZABETH A. SUMMERS, NOTARY PUBLIC
 FRANKLIN COUNTY, PENNSYLVANIA
 MY COMMISSION EXPIRES - MAY 11, 1990
 Member, Pennsylvania Association of Notaries

STATE OF New York }
COUNTY OF Westchester } SS:

On this 26th day of May, 1987, before me, a Notary Public in and for said state and county, the undersigned officer, personally appeared J. Craig McKenzie, known to me (or satisfactorily proven), to be the person whose name is subscribed to the within instrument, and acknowledged the foregoing deed to be his act and deed, and desired the same to be recorded as such.

Witness my hand and official seal, the day and year aforesaid.



Patricia A. Crawley
Notary Public
Westchester County, New York

309,000.00
Quincy
Chamberburg
721000
(7,210.00)
2 (3,070.00)

RECORDED
91 JUN - 3 P 2 49
1750

COPY

I hereby certify that Grantor's precise residence and complete post office address is: 1153 Swamp Fox Road, Chambersburg, Va.

Witness my hand this 29th day of May, 1987.

REALTY TRANSFER TAX

Westchester School District
Borough
Quincy Supervisors
Amount Of Tax Received 3605.00
Tax on Deeds Resolution
David W. Bowers Collector

REALTY TRANSFER TAX

Chamberburg School District
Borough
Swamp Fox Supervisors
Amount Of Tax Received 1545.00 Inc.
Tax on Deeds Resolution
David W. Bowers Collector

987
3rd
Deed
599
June 1987
David W. Bowers
mrl



512.57

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
PAID 599.99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
PAID 599.99

1263
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
PAID 599.99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
PAID 599.99

BETWEEN
John C. McKenzie and Hazel P. Mc-
Kenzie, his wife, Lois McKenzie,
Horst, Johann McKenzie Brechbill,
Anna McKenzie Harry, Marjorie Mc-
Kenzie Piper, and J. Craig Mc-
Kenzie.

AND
Willis M. Leshar, Melvin R. Leshar,
Kenneth A. Leshar, Ronald L.
Bosman and Duane E. Leshar,
Partners, trading and doing
business as Willis M. Leshar
Partnership.

GRANTORS

GRANTEES

DEED

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
PAID 599.99

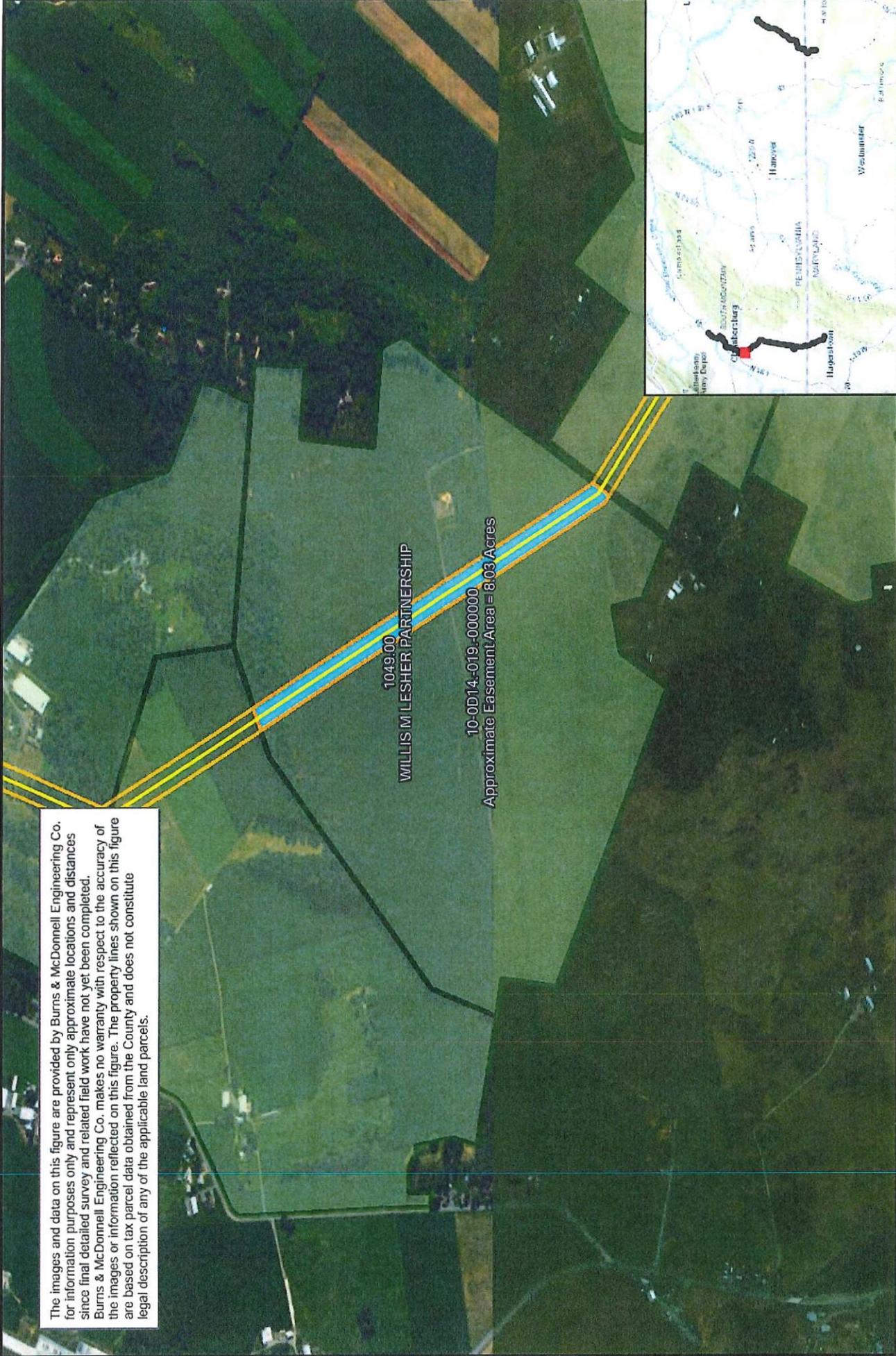
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
PAID 310.00

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
PAID 300.10

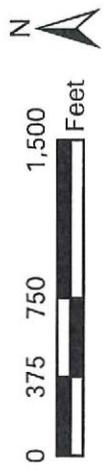
COPY

ATTACHMENT B

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.



-  Centerline
-  Parcel Within ROW
-  Parcels
-  ROW Approximately 130'



Source: ESRI and Burns & McDonnell Engineering.

EXHIBIT A

Owner:
WILLIS M LESHNER PARTNERSHIP
 Franklin PA
 Parcel ID: 1049.00
 Rice to Ringgold

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

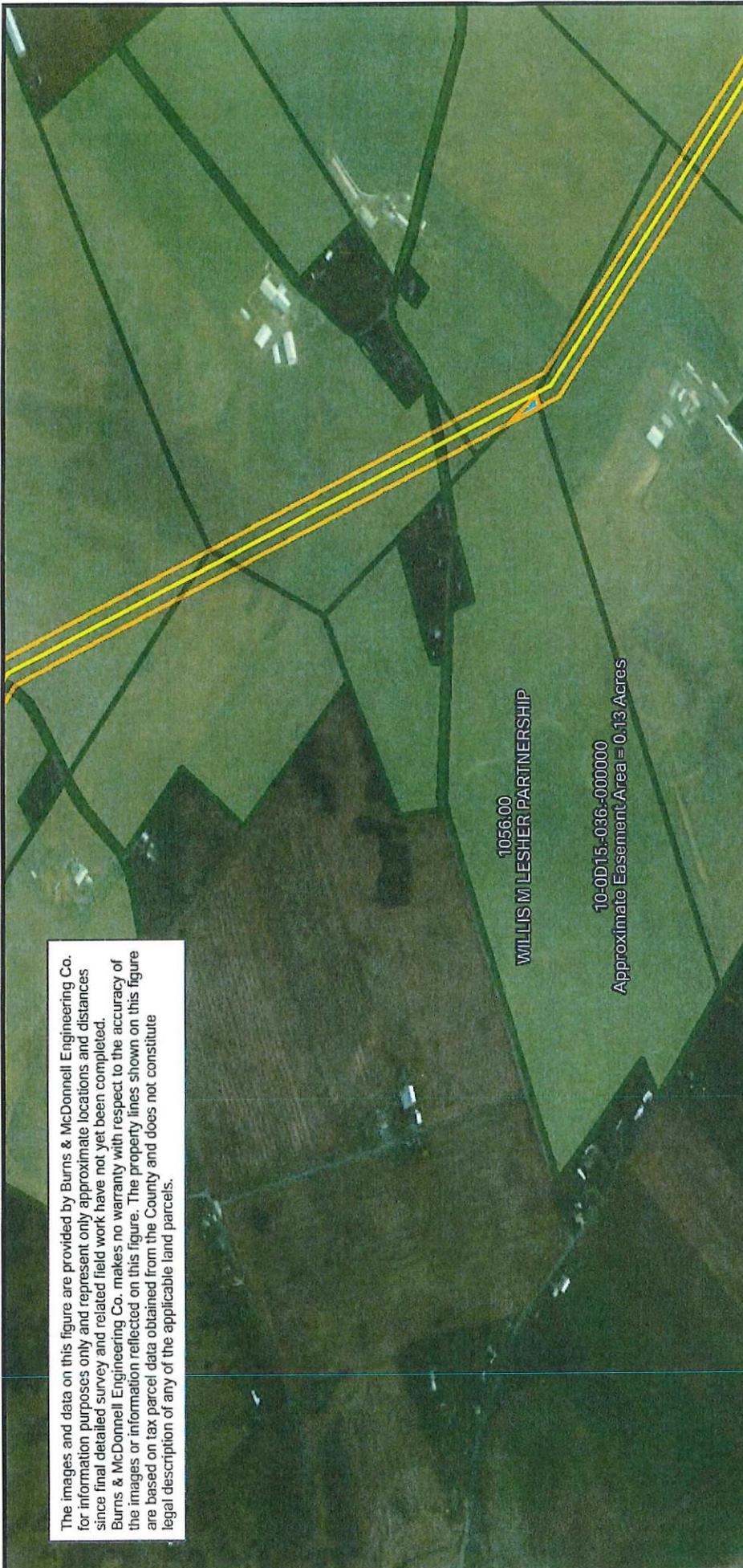


EXHIBIT A

Owner:
WILLIS M LESHER PARTNERSHIP
 Franklin PA
 Parcel ID: 1056.00
 Rice to Ringgold



Source: ESRI and Burns & McDonnell Engineering.

- Centerline
- Parcel Within ROW
- Parcels
- ROW Approximately 130'

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

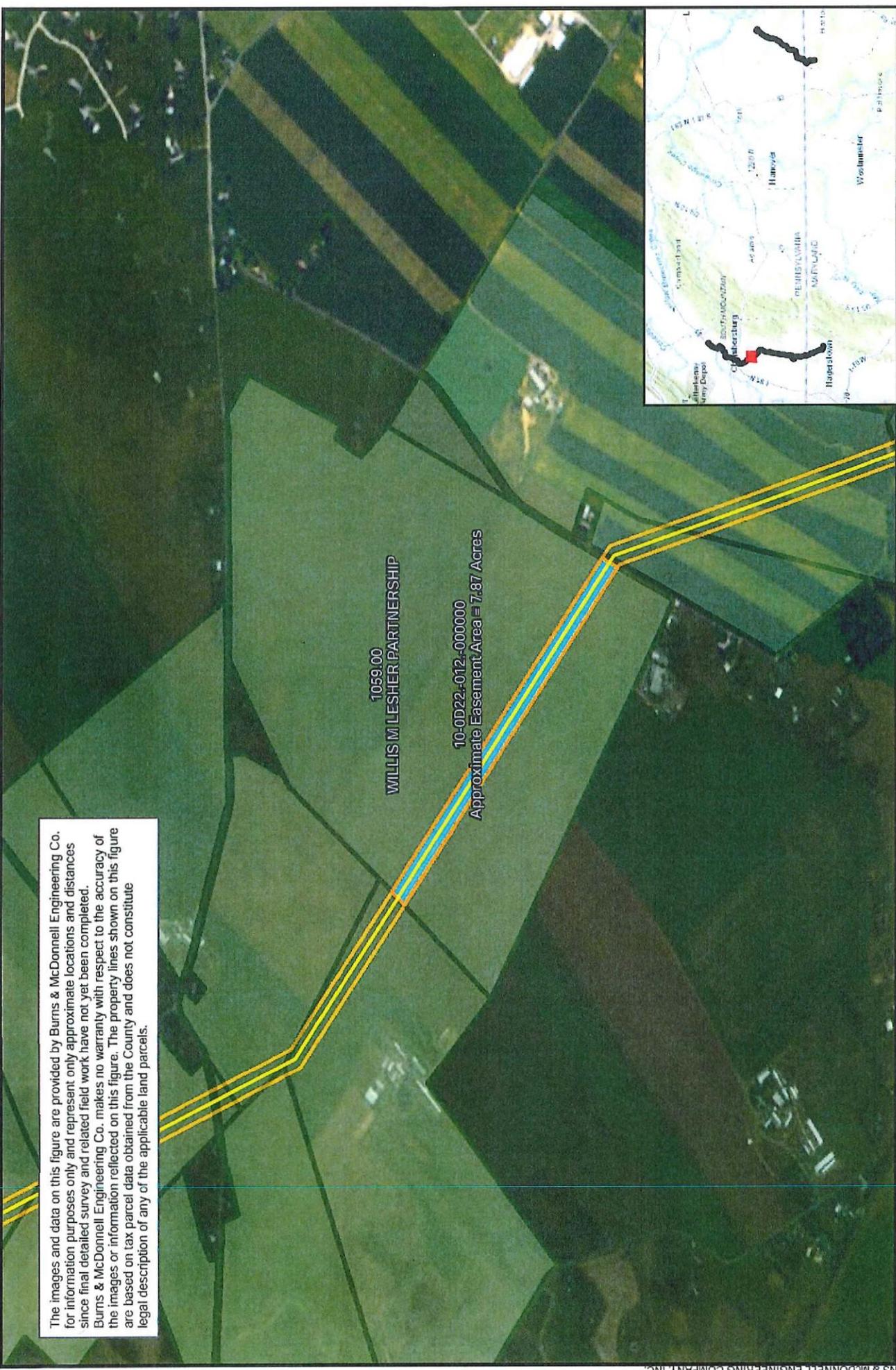


EXHIBIT A
 Owner:
WILLIS M LESHER PARTNERSHIP
 Franklin PA
 Parcel ID: 1059.00
 Rice to Ringgold



Source: ESRI and Burns & McDonnell Engineering.

-  Centerline
-  Parcel
-  Parcel Within ROW
-  ROW Approximately 130'

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1062.00
 WILLIS M LESHNER PARTNERSHIP
 10-0D22-024-000000
 Approximate Easement Area = 4.22 Acres



EXHIBIT A
 Owner:
 WILLIS M LESHNER PARTNERSHIP
 Franklin PA
 Parcel ID: 1062.00
 Rice to Ringgold



-  Centerline
-  Parcel Within ROW
-  Parcels
- ROW Approximately 130'

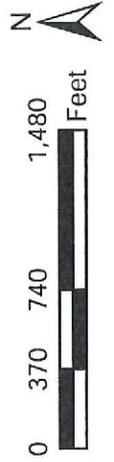
Source: ESRI and Burns & McDonnell Engineering.

Issued: April, 23, 2018

The images and data on this figure are provided by Burns & McDonnell Engineering Co. for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Burns & McDonnell Engineering Co. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.



EXHIBIT A
 Owner:
WILLIS M LESHNER PARTNERSHIP
 Franklin PA
 Parcel ID: 1065.00
 Rice to Ringold



- Centerline
- Parcel Within ROW
- Parcels
- ROW Approximately 130'

Source: ESRI and Burns & McDonnell Engineering.

Issued: April, 23 2018

VERIFICATION

I, Thomas Schaffer, Manager, Transmission Right of Way for Transource Pennsylvania, LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Transource Pennsylvania, LLC to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2018



Thomas Schaffer
Manager, Transmission Right of Way
Transource Pennsylvania, LLC