

March 22, 2022
Ms. Rosemary Chiavetta, Esquire
Secretary, PA Public Utility Commission
P.O Box 3265
Harrisburg, PA 17105-3265

**Re: Docket No. C-2021-3028464
Tracy and Jill Troutman v. Mid-Atlantic Interstate Transmission, LLC
Response to Answer and New Matter of MAIT Amended Complaint**

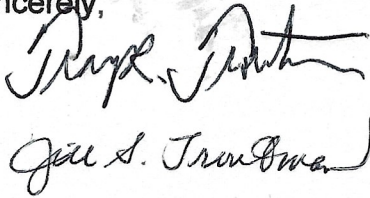
Dear Secretary Chiavetta:

Attached for filing is our Response to the "Answer and New Matter of Interstate Transmission, LLC to the Amended Complaint" submitted by Margaret A. Morris, Esquire, dated March 3, 2022.

A copy of this Response has been provided to Attorney Morris.

If there are any questions, please do not hesitate to contact me.

Sincerely,

Handwritten signature of Tracy and Jill Troutman in black ink.

Tracy and Jill Troutman

Cc: The Hon. Mark A. Hoyer, PA Public Utilities Commission
The Hon. John Coogan, PA Public Utilities Commission
Tori Giesler, Esquire, FirstEnergy Service Company
Margaret Morris, Esquire, Representing MAIT

1. No response
2. Agree that responding utility's name is MAIT. However our amended complaint also included, Met-Ed, FirstEnergy and FirstEnergy Transmission.
3. Agree
4. MAIT avers that they, at all times, have provided reasonable and adequate service to us in accordance with all applicable laws. However, MAIT does not serve us, nor do the transmission lines going through our neighborhood, serve anybody in the neighborhood. We gain nothing from these lines, but assume all of the risk from a health and safety perspective.

MAIT is proposing to replace the current 69kV transmission lines with "like overhead facilities". MAIT's definition of "like" simply means overhead transmission lines and poles. However, it should also be noted that according to a FirstEnergy letter sent to us dated September 1, 2021, the poles will be on average 6 feet taller, AND there will be fewer lines. According to MAIT, "the seven existing overhead wires will be replaced with four overhead wires". That means that each line will now be carrying MORE kV. Given our safety concerns since accidents have already occurred (see below), this becomes an even more dangerous situation through our neighborhood. Each line carries more voltage....and if there are fewer poles, that means the lines are longer, so if they go down, it impacts an even greater area. Also, given the height of the poles, this proposed plan may also include the addition of guy wires, which could further impact our safety and green space.

MAIT claims that "the transmission Line is being rebuilt due to aged facilities and to meet mandatory obligations under Section 1501 of the Code (Project) to provide safe, reasonable and adequate service". Given the past accidents that have occurred with the current poles/lines, and now if the proposed poles are taller, with more kV per line, how is this SAFE?!

MAIT claims that we are not directly impacted by the decision to replace the poles. We agree that the transmission lines do not cross our property, however we disagree that we are not directly impacted by the Transmission lines. We are directly impacted. These poles and lines go through the neighborhood, and cross not only private properties but also public areas, used by the neighborhood, including us. It should be noted that:

- a. Public sidewalks run underneath the lines.
- b. Public roadways run underneath the lines.
- c. Common areas for the neighborhood run underneath the lines.

- d. We (the Complainants) walk the sidewalks and drive directly underneath these lines multiple times daily.
- e. Our children played in the common area countless times which are directly underneath the lines.
- f. Conversely, the existence of the poles and overhead lines have precluded us from using the green space in other common areas.

Thus, we are directly impacted by the transmission poles and lines. MAIT avers that "notice of the Project was provided to all property owners where the transmission line crosses". However we also received a letter from FirstEnergy (from Jenn Rivera, Regional External Affairs Consultant) dated September 1, 2021) explaining the project. So, FirstEnergy obviously believes we have a direct interest in the project as well.

MAIT avers that our objection is based on vague and conclusory allegations.....alleging "aesthetic, health and health concerns as well as impact on property values". Of note, MAIT made a gross clerical error in quoting us above. They meant to say "health and **SAFETY** concerns". (Please reference our past documentation). In fact, safety is our biggest concern for wanting the transmission lines to be placed underground.

MAIT naively claims that we have made "vague and conclusory allegations regarding health and safety that are without merit". Note that there have been **multiple safety issues/accidents** involving the current poles and above ground lines in our neighborhood that have been directly observed by residents in our neighborhood. Consider the testimonies of multiple witnesses from our neighborhood below:

1. "Dear PUC:

Regarding my witnessing of a recent occurrence of broken/power line(s).

I was woken in the Summer of 2021 – during the middle of the night - to the sound of 'lightning & a sky filled with 'fireworks' – this turned out to be a broken wire(s) that was lighting up the night sky and filling it with a massive amount of sparks. This was violent and loud enough to wake me from a sound sleep.

When I looked out of my window - I saw multitudes of sparks & fireballs' that litt up the sky – the sound was quite loud – it sounded like explosions – This happened because of a wire or more had snapped and was carrying massive amounts of electricity. I noticed the power company/utility company was out early the following morning for repairs.

Thankfully – this occurred in an area where there are NO HOMES. Had there been homes closeby, I am fearful of the safety – certainly FIRE would be an imminent risk." Respectfully Debora Connell, 195 Bittersweet Drive, Hershey, PA.

2. "I witnessed a lightning strike on a pole behind our house several years ago. Smoke, but no fire from the pole, fortunately" (Dr. Andrew Freiberg, Bittersweet Drive)
3. "The transformer behind Lennon family house on Nye road side almost caught on fire during a severe thunderstorm. We woke up to loud explosions and saw fire and sparks on that pole and transformer for hours. Perhaps the rain kept it from starting an actual fire but it was definitely a scary scene that night. Unfortunately, I don't recall the exact date our ring camera didn't catch that. It was sometime last year". (Dr. Byung Joo, Bittersweet Drive)
4. "The incident we witnessed happened several years ago; not sure of the exact date. It occurred behind the Bryant's home on Hawthorne Drive when the previous owners (The Scannells) lived there. One of the lines came down from the pole and was sparking on the ground; I believe it was weather related from a summer storm." (Mike Marino, Hawthorne Drive)
5. "March 10, 2022

This letter is being submitted in order to confirm the hazards of having above ground utility poles.

One night during the month of July of 2021 I awoke to a very large boom and a flash of light that lit up the whole interior of our house. As I got up to investigate, it happened again. I could see the flash was coming from outside. The next day I noticed a Met Ed truck on the road across from our house. (The corner of Birch and Bittersweet Lane) I went out and spoke to the men in the truck to report what we had experienced. He told me it was due to a faulty line connection on one of the poles.

If this were to occur to a line in the center of our development it would pose a great safety hazard. Incidents like this just confirm the fact that utility lines should be underground to protect our community."

(Barbara Jaeger, Bittersweet Drive)

Accidents have already happened on these existing poles/lines! Given that these lines cross public spaces and common areas that we cross daily, we do have a direct, immediate and substantial interest, as does everybody in the neighborhood. Isn't our safety important to MAIT? How many more

accidents have to occur before MAIT considers this important? Is MAIT really implying that these accidents and our concerns are "frivolous, and harassing" as they claim? That would be shameful.

Our safety issues are more than "mere conjecture". As we have stated above, accidents (plural) have already occurred. That is not "conjecture". That is fact. Thank God we were not under the poles/lines during these strikes since they cross public, common areas throughout our neighborhood.

As further reference, our Derry Township Code currently indicates that all utility and communications lines which are newly installed must be installed underground. All of the utilities and communications lines that serve our neighborhood are underground...with the exception of the transmission lines in question which do not even serve us. Our neighborhood is assuming all of the risk and none of the reward/benefits from these overhead wires. While we recognize that the township code does not pertain to these transmission lines since they were installed prior to the code, the fact that there is a Township underground code shows that they feel it is better for the community from a safety, and environmental perspective. See Derry Township Design and Construction Standards #185-38 Section B states "All electric, telephone, television and other communication service lines which are newly installed to serve a development activity regulated by this chapter shall be installed underground".

There is already precedent set in Hershey with removing overhead wires/poles and placing new lines underground (e.g. Forrest Avenue project). In that case, PPL listened to the requests of the citizens because it was the right thing to do.

5. We disagree. As stated above, it is naïve to claim that just because the lines do not cross our property, we don't have a direct, immediate or substantive interest in the project. We are under these lines multiple times daily as they cross public and common areas in our neighborhood. Additionally, we have provided multiple instances of fact above that accidents have already occurred with the current overhead lines and poles in this neighborhood. Given that MAIT is proposing to replace the current above ground lines/poles with "like" above ground lines and poles, and given multiple accidents have already occurred, MAIT cannot guarantee that "like" replacements will be accident-free.
6. No response
7. No response

8. No further response

9. No further response

10. No further response

11. As MAIT so claims, we understand that they have "the right to manage its own affairs to the fullest extent consistent with the public interest....." The public in this case is defined as the neighborhood of the Meadows. Its consistent public interest is to have the lines placed safely underground. 37 of 39 households in our Homeowners Association are in favor of putting the lines underground.

12. While we don't deny that MAIT provides service consistent with its obligations we are objecting to how they are proposing to do it. They can still meet their objectives by placing the transmission lines underground.

13. Disagree. The lines and poles cross public and common areas in the neighborhood, which we cross multiple times daily. Our safety is just as important. We do have standing to bring this Complaint.

Conclusion

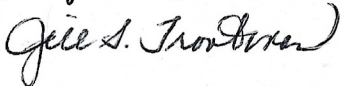
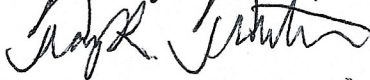
- Given these lines cross public sidewalks and common spaces that we travel multiple times daily, we do have a direct, immediate, and substantial interest in this case.
- Consider that the Mission Statement of First Energy (of which MAIT is a subsidiary) states they are a "forward-thinking electric utility centered on integrity, powered by a diverse team of employees committed to making customers' lives brighter, the environment better, and our communities stronger". Putting the lines underground is forward thinking and better for the environment and our community. Corporate actions should mirror their mission statement....otherwise it is hypocrisy, or an attempt to intimidate the complainants. Either way, it is deplorable. We encourage MAIT to be guided not by what may be the cheapest or easiest solution, but by integrity and what is the right thing to do.
- Lastly, for perspective, please know that the lines/poles in question only cover approximately 2000 feet (+/-) through our neighborhood. This complaint is NOT arguing that miles and miles of line be placed underground. This is minimal...less than ½ mile to be placed underground! Replacing something old with similar (overhead lines and poles) is contrary to their own mission statement. It's like saying "my 60 year old rotary dial phone is broken, so I'm planning to go

out and buy a "like" rotary dial phone". This is an appeal for MAIT to do the 'right thing'.

Based on the facts presented above and in these Complain documents, this requests that MAIT and all parties involved place the lines underground.

Lastly, there are a number of individuals in our neighborhood who have also filed similar complaints. For the sake of The Court's time and that of all others involved, this requests that we would like to meet with the Judges as a group to present our case and resolve this issue.

Respectfully submitted,

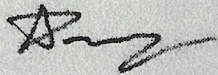


Tracy and Jill Troutman

Cc: The Hon. Mark A. Hoyer, PA Public Utilities Commission
The Hon. John Coogan, PA Public Utilities Commission
Tori Giesler, Esquire, FirstEnergy Service Company
Margaret Morris, Esquire, Representing MAIT

March 10, 2022

Several years ago, I was in my back yard during a thunderstorm. I saw a flash of light and heard instantaneous thunder. Upon turning around, I saw smoke coming from the top of one of the utility poles on the neighbor's property. Fortunately, there was no fire and no downed wires and no one was hurt. This occurred over ten years ago so I do not remember the exact date.



Andrew S. Freiberg
115 Bittersweet Drive

Debora N. Connell
198 Bittersweet Dr.
Hershey, PA. 17033

March 10, 2022

Dear PUC:

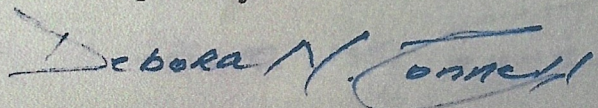
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I was woken in the Summer of 2021 – during the middle of the night –
To the sound of 'lighting' & a sky filled with 'fireworks' – this turned out to be a broken wire(s)
that was lighting up the night sky and filling it with a massive amount of sparks. This was
violent and loud enough to wake me from a sound sleep .

When I looked out of my window – I saw multitudes of sparks & 'fireballs' that litt p the sky –
the sound was quite loud – it sounded like explosions -
This happened because of a wire or more had snapped and was carrying massive amounts of
electricity. I noticed the power company/utility company was out early the following morning,
for repairs.

Thankfully – this occurred in an area where there are NO HOMES. Had there been homes
closeby, I am fearful of the safety – certainly FIRE would be an imminent risk.

Respectfully,

A handwritten signature in blue ink that reads "Debora N. Connell". The signature is written in a cursive style with a large, stylized "D" and "C".

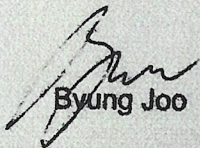
Debora N. Connell

From M. Marino. The incident we witnessed happened several years ago; not sure of the exact date. It occurred behind the Bryant's home on Hawthorne Drive when the previous owners (The Scannells) lived there. One of the lines came down from the pole and was sparking on the ground; I believe it was weather related from a summer storm. Wish I had more information to share with you.

3-13-2022

To whom it may concern,

A few days after July 4th weekend in 2021, the transformer/wires behind 215 Bittersweet drive on Nye road side almost caught on fire during a severe thunderstorm. We woke up to loud explosions, wind up type of sound and saw fire and sparks on that pole and transformer for hours. Perhaps the rain kept it from starting an actual fire but it was definitely a scary scene that night. Unfortunately, I don't recall the exact date and our ring camera didn't catch that.



Byung Joo

225 Bittersweet Dr. Hershey, PA 17033

March 10, 2022

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One night during the month of July of 2021 I awoke to a very large boom and a flash of light that lit up the whole interior of our house. As I got up to investigate, it happened again. I could see the flash was coming from outside. The next day I noticed a Met Ed truck on the road across from our house. (The corner of Birch and Bittersweet Lane) I went out and spoke to the men in the truck to report what we had experienced. He told me it was due to a faulty line connection on one of the poles.

If this were to occur to a line in the center of our development it would pose a great safety hazard. Incidents like this just confirm the fact that utility lines should be underground to protect our community.

Barbara Jaeger

September 1, 2021

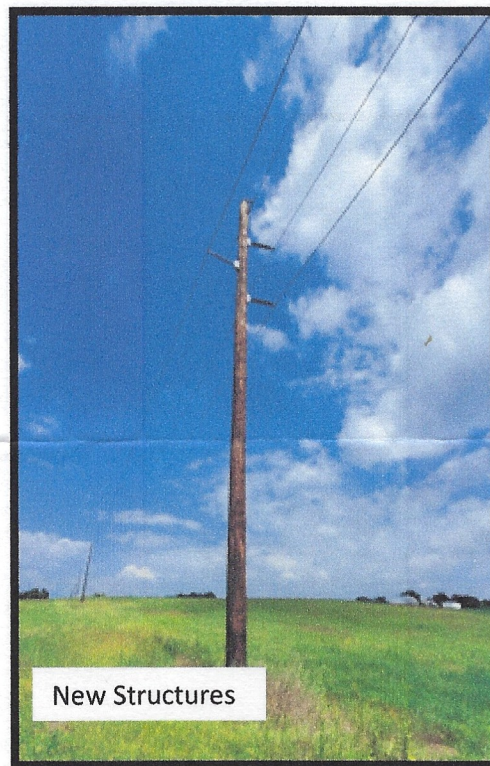
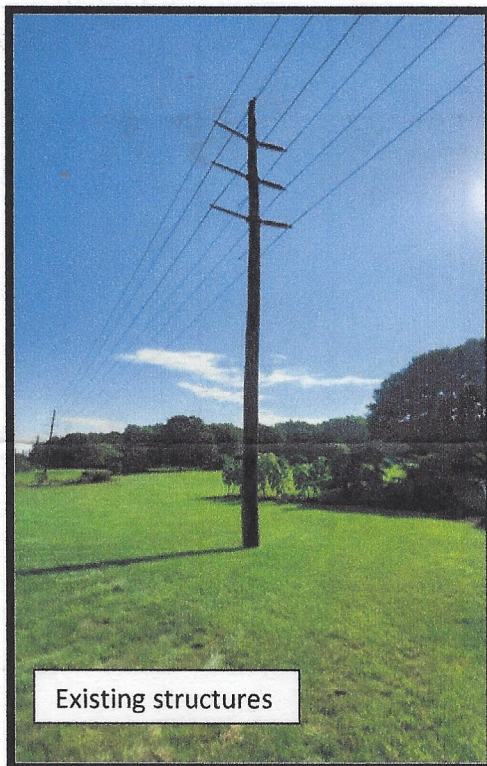
TROUTMAN TRACEY R.
160 HAWTHORNE DR.
HERSHEY, PA 17033

Campbelltown – Middletown – North Hershey 69-kV Transmission Line Rebuild

Dear TROUTMAN TRACEY R.:

As part of FirstEnergy's ongoing commitment to enhancing electric service, FirstEnergy is rebuilding an existing 69-kilovolt transmission line to strengthen the electric system in Derry Township and surrounding areas.

You are receiving this letter in response to inquiries regarding the project in the Meadows housing development. The project between Sand Hill Road and Nye Road will replace existing wood poles averaging about 53 feet tall with new wood poles that average about 59 feet tall. In addition, the seven existing wires will be replaced with four wires.



The new transmission poles are similar in height to the prior poles and reduce the number of wires from 7 to 4.

FirstEnergy continues to work with individual landowners who have requested changes to the project design, and engineers are making revisions at those locations where possible.

While FirstEnergy received requests from some residents to place this transmission line underground through the Meadows development, the company constructs transmission lines underground only when there are no viable above-ground options. The open trenching necessary to bury transmission lines causes greater environmental impacts, as does the need to create significant access roads to accommodate heavy equipment. It is also more difficult to restore power during outages on underground lines because it takes longer to identify and repair damaged cable.

In addition, it is significantly more expensive to run transmission lines underground. The costs of transmission lines in Pennsylvania are spread across the rate base of all FirstEnergy customers in the state, much like the public highway system. It is not reasonable to place the additional financial burden on our other customers for local aesthetic concerns over the visibility of an overhead transmission line.

Several landowners mentioned concerns with electric and magnetic fields (EMF). FirstEnergy is committed to keeping the public safe. This applies to all aspects of our operations, including the design and routing of our transmission lines. Our facilities are built and operated with strict adherence to the requirements of all applicable state and federal statutes related to safety, including requirements specified in the North American Electric Reliability Corporation (NERC) Mandatory Reliability Standards and the National Electric Safety Code (NESC), as well as those adopted by the Public Utilities Commission of Pennsylvania (PAPUC) and the Occupational Health and Safety Administration (OSHA).

Electric and magnetic fields surround anything that transmits or uses electricity, including household appliances, cellular devices and power lines. There are no federal exposure limits in the United States, and no state agency has adopted exposure limits based on a finding that EMF causes adverse health effects. Some scientific organizations have recommended exposure guidelines for settings with very high EMF levels, which are far greater than any EMF levels found in our environment, including those near transmission lines.

Additional information about electric and magnetic fields and health can be found on the FirstEnergy website at the following link: <https://www.firstenergycorp.com/content/customer/help/safety/using-electricity/emf.html>

FirstEnergy is committed to addressing questions and to providing support during construction of the project. If you have additional questions, please call our project hotline at 1-888-311-4737.

Sincerely,



Jenn Rivera

Regional External Affairs Consultant

FirstEnergy Service Company on behalf of Metropolitan Edison Company