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April 25, 2022

VIA ELECTRONIC FILING

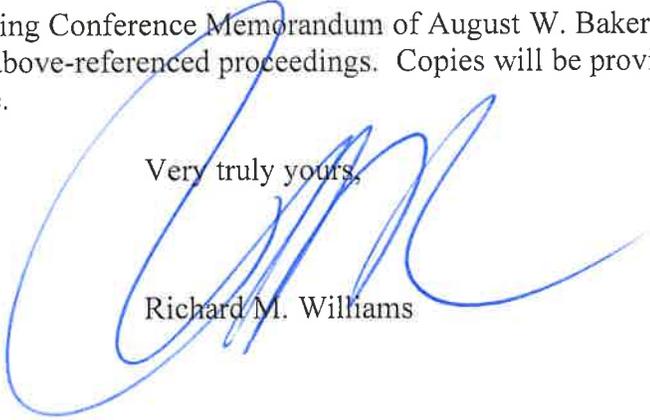
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

**RE: Application of PPL Electric Utilities Corporation
Docket No. A-2022-3030969; and
Application of PPL Electric Utilities Corporation
Docket No. A-2022-3031013;
Our File No.: F0251-001**

Dear Secretary Chiavetta:

Enclosed for filing is the Prehearing Conference Memorandum of August W. Baker and Diana M. Baker in connection with the above-referenced proceedings. Copies will be provided as indicated on the Certificate of Service.

Very truly yours,


Richard M. Williams

RMW/sh

Enc.

cc: Hon. Mary D. Long
Certificate of Service

**BEFORE
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities Corporation : A-2022-3030969
Filed Pursuant to 52 Pa. Code Chapter 57 :
Subchapter G, For Approval To Rebuild The :
Existing Summit-Lackawanna #1 And #2 230 Kv :
Transmission Lines Connecting The Summit :
230-69 kV Substation And the Lackawanna :
500-230-69 kV Substation in Lackawanna :
County, Pennsylvania :

Application of PPL Electric Utilities Corporation : A-2022-3031013
Under 15 Pa.C.S. § 1511(c) For A Finding and :
Determination That The Service To Be Furnished :
By the Applicant Through Its Proposed Exercise :
of the Power of Eminent Domain To Acquire :
A Certain Portion Of The Lands of August :
and Diana Baker in Dickson City Borough and :
Scott Township, Lackawanna County, :
Pennsylvania For the Proposed Rebuilding Of :
The Summit-Lackawanna #1 And #2 230 kV :
Associated With The Proposed :
Summit-Lackawanna Project Is Necessary or :
Proper For The Service, Accommodation, :
Convenience, Or Safety Of The Public :

**PREHEARING CONFERENCE MEMORANDUM
OF AUGUST W. BAKER AND DIANA M. BAKER**

Pursuant to 52 Pa. Code § 5.224(c) and the Prehearing Conference Order dated March 3, 2022, August W. Baker and Diana M. Baker (“Mr. & Mrs. Baker”), hereby submit this Prehearing Conference Memorandum in the above-captioned matter and state as follows:

I. PROCEDURAL HISTORY

On February 17, 2022, PPL Electric Utilities Corporation (“PPL”) filed an application pursuant to 521 Pa. Code Chapter 57 Subchapter G, for approval to rebuild the existing Summit-Lackawanna #1 and #2 230 kV Transmission Lines Connecting the Summit 230-69kV Substation and the Lackawanna 500-230-69 kV Substation in Lackawanna County, Pennsylvania (the “Rebuild Application”). Thereafter, on February 22, 2022, PPL filed an application

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pursuant to 15 Pa.C.S. § 1511(c) seeking a finding that service to be furnished through PPL's exercise of the power of eminent domain across lands owned by Mr. & Mrs. Baker in Dickson City Borough and in Scott Township, Lackawanna County, for the rebuilding of the Summit-Lackawanna #1 and #2 230kV is necessary or proper for the service, accommodation, convenience or safety of the public (the "Condemnation Application").

On March 9, 2022, Mr. & Mrs. Baker filed protests to both the Rebuild Application and the Condemnation Application.

On March 3, 2022, a Prehearing Conference Order was issued by Administrative Law Judge Mary D. Long (the "ALJ"), scheduling a prehearing conference to be held on Tuesday, April 26, 2022, at 10:00 a.m. The ALJ's Prehearing Conference Order also directed the parties to file Prehearing Memoranda by 2:00 P.M. on Monday, April 25, 2022.

On March 15, 2022, the Commonwealth of Pennsylvania, Department of Transportation filed a Notice of Appearance concerning both the Rebuild Application and the Condemnation Application.

Mr. & Mrs. Baker herein file this Prehearing Conference Memorandum in anticipation of the Prehearing Conference.

II. SERVICE OF DOCUMENTS

Mr. & Mrs. Baker request that Richard Huffsmith, Esquire and Richard M. Williams, Esquire be listed on the service list on their behalf. Counsel's contact information is provided below:

RICHARD L. HUFFSMITH, ESQUIRE
26 East Tioga Street
Tunkhannock, PA 18657
Phone: 570-240-4400
Email: Richard.huffsmith@gmail.com

RICHARD M. WILLIAMS, ESQUIRE Hourigan, Kluger & Quinn, P.C.
600 Third Avenue
Kingston, PA 18704
Phone: 570-287-3000
Facsimile: 570-287-8005
E-mail: rwilliams@hkqlaw.com

Mr. & Mrs. Baker agree to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies be served upon Mr. & Mrs. Baker at awb248@yahoo.com.

III. WITNESSES AND ISSUES

Mr. & Mrs. Baker intend to present the testimony of the following witnesses:

August W. Baker
178 East Pine Street
Dunmore, PA 18512

Diana M. Baker
178 East Pine Street
Dunmore, PA 18512

Mr. & Mrs. Baker will testify as to the PPL's purported easement across their property and the proceedings and matters pending in that certain action titled, *August Baker and Diana Baker v. PPL Electric Utilities Corp. and T&D Power, Inc.*, docketed with the Lackawanna County, Pennsylvania Clerk of Judicial Records to No.: 15- CV- 4264, which challenges the validity of PPL's purported easement interest in the property.

Mr. & Mrs. Baker may amend their pre-filed statements and exhibits, as appropriate, during the course of this proceeding, based upon more recent information, as such information becomes available. Further definition of the issues will be developed by the parties during the course of this proceeding. Mr. & Mrs. Baker reserve the right to call additional witnesses, present testimony, or both on additional issues and subject matters that may arise during the course of this proceeding.

IV. LITIGATION SCHEDULE

Counsel for PPL and counsel for Mr. & Mrs. Baker recommend the following litigation schedule:

Filing	February 14, 2022
Prehearing Conference	April 26, 2022
Written Direct Testimony	June 15, 2022
Written Rebuttal Testimony	July 15, 2022
Prehearing Stipulations/Motions	July 22, 2022
Evidentiary Hearings	August 11-12, 2022
Main Briefs	September 9, 2022
Reply Briefs	September 23, 2022

V. PROTECTIVE ORDERS

Mr. & Mrs. Baker do not anticipate submitting any motion for protective order.

VI. SETTLEMENT DISCUSSIONS

To date, no settlement discussions have been held. However, Mr. & Mrs. Baker are willing to address settlement with the other parties.

RESPECTFULLY SUBMITTED,

s/Richard L. Huffsmith/Richard M. Williams
RICHARD L. HUFFSMITH, ESQ.
26 East Tioga Street
Tunkhannock, PA 18657
IDENTIFICATION NO. 78895
and
RICHARD M. WILLIAMS, ESQ.
600 Third Avenue
Kingston, PA 18704
IDENTIFICATION NO. 72945

CERTIFICATE OF SERVICE

(Docket No.: A-2022-3030969)

(Docket No.: A-2022-3031013)

I certify that I have this day served a true copy of the Prehearing Conference Memorandum of August W. Baker and Diana M. Baker on the following:

Via Electronic Mail

David B. MacGregor, Esquire
Garrett P. Lent, Esquire
Post & Schell, P.C.
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Via First Class Mail

Michael J. Shafer, Esquire
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101

Via Electronic Mail

Jillian Fellows, Esquire
Assistant Counsel
Commonwealth of Pennsylvania
Department of Transportation
Office of Chief Counsel
P.O. Box 8212
Harrisburg, PA 17105-8212
jfellows@pa.gov

Date: This 25th day of April, 2022.

s/Richard M. Williams

Richard M. Williams, Esquire