

Preliminary objections for proposed PPL Richfield-Dalmatia 69kV tie line

As per order of David A. Salapa and Joel Cheskis Administrative Law Judges in reference to PPL's application seeking Eminent Domain over portions of the property owned by Shoop Family Trust, Lower Mahanoy Township, Northumberland County, Pennsylvania. A-2011-2267426

Initial Prehearing Conference Memoranda of Shoop Family Trust for December 13, 2011

I. *Service of documents.*

We request that all documents be served at this time to:

**Shoop Family Trust A-2011-2267426
337 Shoop Road
Dalmatia, PA 17017
(570) 758-3108**

II. *Settlement*

A settlement has not been reached with PPL for a right of way over our property nor is any pending at this time.

- 1. Trespass and damage concerns linger without answers from PPL.**
- 2. Verbal discussions with PPL's Real Estate Specialist over concerns about property use were not clear and not confirmed.**
- 3. Request for answers to our real estate/business concerns was not answered verbally or in writing. Most phone calls to PPL are unanswered or not returned.**
- 4. There has not been 9 negotiation attempts made with us as stated in PPL's PUC application. The information by PPL is false.**
- 5. Adding more lines to the towers later without future payments for destruction of land and/or property?**
- 6. Health hazards for area residents as well as livestock entering the food chain?**
- 7. My grandson is interested in agricultural enterprises; there would be less ground to farm and more hassles/frustrations in the raising, feeding, and selling of livestock?**
- 8. The proposed route would limit the farming practices to this land thus causing a severe financial loss in land rent that Edwin is now receiving.**
- 9. A farm owned by the same family for over 100 years should be preserved as a family farm not destroyed for a power line!**

10. Loss of land rent and a one-time payment from PP&L does not explain my loss of income for future years in paying my taxes; and on a fixed income how do I do that?
11. PP&L is attacking the elderly land owners in using forced persuasion to get them to sign off.
12. PP&L is discriminating against rural landowners who chose to resist selling land to developers over the years; in order to keep rural land open and aesthetic.

III. Discovery

We ask that PPL supply all needed information to us as asked, including questions about procedures and to also include correspondence information, documents and other information which is relevant to discovery. (Discovery questions- attachment A but not limited to) We ask for a future public input hearing this spring so that we may study and gather evidence from experts, the community and also obtain documents and information from PPL for discovery.

IV. Litigation Schedule

Shoop Family Trust proposes the following schedule:

Pre-hearing conference	December 13, 2011
Discovery questions	June 18
Public Input Hearings	July 31
PUC Hearings	August or the following summer

V. Witness list:

To include all PPL staff /employees at our discretion who we feel are necessary for clarification of questions and testimony.

Questioning to include but not limited to PPL policy, Procedures, Needs, and or PPL RP&P guidelines.

Witness list to also include but not limited to everyone on the preliminary hearing service list.

VI. Issues and Evidence

Issues are listed in the preliminary objections as filed by the Shoop Family Trust as well as Discovery questions attachment A.

Evidence to include eyewitness testimony, photographs and documents.

VII. Consolidation

We do not necessarily support consolidation because of the number of people involved and conflicting work and personal schedules.

**Discovery Questions and Evidence requested of PPL for Shoop Family Trust
A-2011-2267426 Attachment A**

1. In our opinion PPL has not proven the proposed 69 kV line is necessary for proper service, accommodation, convenience or safety of area residents.
 - a. We ask PPL furnish documents for right of way maintenance records of the study area for the past 10 years. Including dates, times and names of contractors who were assigned for each project for verification of records.
 - b. We ask that PPL furnish all power outage documents for the past 10 years for the study area including dates, times and length of each outage and the causes of such outages.
 - c. We ask that PPL furnish the dates and times of any power diverted away from our study area to other communities during the past 10 years.
 - d. We ask for PPL for clear grid system maps of the study area to include any power coming into the area and any power leaving the study area.
 - e. We ask that PPL also supply the grid system maps of the 36-02 12 kV line (Susquehanna River crossing at Dalmatia) and the number of residents, names and addresses of individuals it serves so that we may verify PPL records of stated need.
 - f. We ask that PPL obtain an independent 3rd party evaluation of the entire proposal to verify the need for the 69kV tie line.
 - g. We ask PPL for a detailed independent 3rd party evaluation to verify outages and line performance.
 - h. We ask PPL for a detailed report and costing of a double circuit line which PPL stated would cost 22 million.
 - i. We need a detailed report on the three options and the exact cost for each so we may arrive at an independent opinion.
 - j. We ask PPL for details on all discussions with local authorities on the options for the proposed line, including the names of the officials, the date, time and discussion involved.
 - k. We ask PPL for all records of the informational meetings that were held for the public. To include photo copies of all written comments for or against each proposal. The names can be blacked out for privacy.

- l. We ask how PPL plans to pay for the project and is it with company funds and increase in fees or government grants.
 - m. Adding more lines to the towers later without future payments for destruction of land and/or property?
 - n. Health hazards for area residents as well as livestock entering the food chain?
 - o. My grandson is interested in agricultural enterprises; there would be less ground to farm and more hassles/frustrations in the raising, feeding, and selling of livestock?
 - p. The proposed route would limit the farming practices to this land thus causing a severe financial loss in land rent that Edwin is now receiving.
 - q. A farm owned by the same family for over 100 years should be preserved as a family farm not destroyed for a power line!
2. We feel PPL did not follow proper procedures throughout the entire project.
 - a. We ask for a response from PPL as to the breaking of State law.
 - b. We ask for PPL as to why they did not pay damage costs associated with this project.
 - c. We ask for a response from PPL for not answering requests for information.
 - d. We ask for PPL for a response about false information on the PUC eminent domain application docket.
3. We are likely to have many other questions of PPL as the proceeding progresses so these are not meant to be questions in entirety.

Respectfully submitted,

Edwin Shoop,
Shoop Family Trust



Certificate of Service

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of & 1.54 (relating to service by a party)

All served via first class mail.

David B MacGregor
Post and Schell PC
Four Penn Center
1600 John Kennedy Blvd
Philadelphia PA 19103-2808
215.587.1197

Shoop Family Trust
C/O Denny Shoop
411 Shoop Road
Dalmatia PA 17017
A-2011-2267426

Randall Clark
701 State Route 147
Dalmatia PA 17017
A-2011-2267352

Gary & Dorene Lahr
291 State Route 147
Dalmatia PA 17017
A-2011-2267429

John & Evelyn Zeiders
799 Adams Road
Dalmatia PA 17017
A-2011-2267353

Elijah & Faye Lahr
679 State Route 147
Dalmatia PA 17017
A-2011-2267446

Michael Schwalm
1377 Urban Road
Herndon PA 17830
A-2011-2267388

Michael & Logan Wendt
21 Hoffman Road
Duncannon PA 17020
A-2011-2267349

Roy & Cindy Maurer
469 Malta Road
Dalmatia PA 17017
A-2011-2267416

Marvin Roger Hess & Leona Hess
2078 Old Trail Road
Liverpool PA 17045
A-2011-2267448

Ronald & Dianne Mace
584 Malta Road
Dalmatia PA 17017
A-2011-2267418

Shoop Family Trust
C/O Edwin Shoop
337 Shoop Road
Dalmatia PA 17017
A-2011-2267426

Dated this 12th day of December, 2011

Edwin Shoop

Signature

