

**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 Ron and Dianne Mace, Lower Mahanoy Township, Northumberland County, Pennsylvania. A-2011-2267418

**Initial Prehearing Conference Memoranda of Ron and Dianne Mace for December 13, 2011**

**I. *Service of documents.***

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

Ron and Dianne Mace      A-2011-2267418  
584 Malta Road  
Dalmatia, PA 17017  
(570) 758-1567

**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. Verbal discussions with PPL's Real Estate Specialist over concerns about property use were not clear and not confirmed.
2. There has not been 7 negotiation attempts made with us as stated in PPL's PUC application. The information by PPL is false.

**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 also ask that the due date for discovery be in June. 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***

Ron and Dianne Mace propose the following schedule.

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

***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 attachment B 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 Ron and Dianne Mace  
A-2011-2267418**

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 3<sup>rd</sup> party evaluation of the entire proposal to verify the need for the 69kV tie line.
  - g. We ask PPL for a detailed independent 3<sup>rd</sup> 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.
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 why PPL is discriminating against the farmer, especially the *elderly farmers*?
    - 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.
    - e. We also ask why PPL would leave their survey stakes in the fields ?
  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.

Ron an Dianne Mace

*Ronald J. Mace*  
*Dec. 9, 2011*

### 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  
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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

Administrative Law Judges  
David A. Salapa  
Joel Cheskis  
P.O. Box 3265  
Harrisburg ,Pa. 17105-3265

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

Rosemary Chiavetta  
Secretary  
Pa Public Utility Commission  
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