



Elizabeth U. Witmer  
Phone: (610) 251-5062  
Fax: (610) 408-4400  
ewitmer@saul.com  
www.saul.com

February 27, 2013

**VIA ELECTRONIC FILING**

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

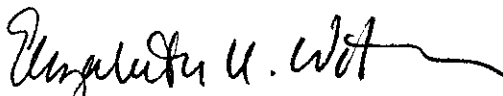
**Re: Transcontinental Gas Pipe Line Corporation  
Docket No. A-2013-2341208**

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced proceeding please find the Petition to Intervene of Transcontinental Gas Pipe Line Company, LLC.

Copies will be provided to the persons as indicated on the enclosed Certificate of Service.

Respectfully submitted,

  
Elizabeth U. Witmer

EUW/llg  
Enclosure  
cc(w/encls): Honorable David A. Salapa  
PPL Electric Utilities Corporation  
Certificate of Service



Trustee of the Residuary Trust of James C. Arthur	:	
	:	
Anthony J. Lupas, Jr. and Lillian Lupas	:	A-2012-2341118
John Lupas and Judy Lupas,	:	
Grace Lupas, Eugene A. Bartoli and	:	
Robert J. Fankelli	:	
	:	
Ronald G. Sidovar and Gloria J. Sidovar	:	A-2012-2341120
	:	
FR First Avenue Property Holding, LP	:	A-2012-2341123
	:	
Transcontinental Gas Pipe Line Corporation	:	A-2013-2341208
	:	
William Petrouleas and Joanna Petrouleas	:	A-2013-2341209
	:	
Peter Palermo and Francine Palermo	:	A-2013-2341211
	:	
Christopher Maros and Melinda Maros	:	A-2013-2341213
	:	
Dianna L. Doss	:	A-2013-2341214
	:	
Donald Januszewski	:	A-2013-2341215
	:	
International Consolidated Investment Company	:	A-2013-2341216
	:	
Bradley D. Hummel	:	A-2013-2341220
	:	
Michael Palermo and Joanne Palermo	:	A-2013-2341221
	:	
Roberta Searfoss a/k/a Judy Searfoss	:	A-2013-2341232
Executrix of the Estate of Euylla Hughes	:	
a/k/a Eylla Hughes	:	
	:	
John F. and Veronica Iskra	:	A-2013-2341233
	:	
Michael A. Mitch and Sue K. Mitch	:	A-2013-2341234
	:	
Clifton Acres, Inc.	:	A-2013-2341236
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Dietrich Hunting Club	:	A-2013-2341237
	:	
Art Borrower Propco 2010-5 LLC	:	A-2013-2341238
	:	

NLMS, Inc.	:	A-2013-2341239
	:	
US Industrial Reit II	:	A-2013-2341241
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Ronald Solt	:	A-2013-2341249
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Merel J. and Arlene J. Swingle	:	A-2013-2341250
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Edward R. Schultz	:	A-2013-2341253
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Donald W. Henderson and Louis Bellucci	:	A-2013-2341262
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Fr E2 Property Holding LP	:	A-2013-2341263
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Sylvester J. Coccia	:	A-2013-2341267
	:	
Lawrence Duda	:	A-2013-2341271
	:	
Mark M. Mack, J. Dean Mack and Heather K. Mack	:	A-2013-2341272
	:	
Blue Ridge Real Estate	:	A-2013-2341277
	:	
James L. and Michaelene J. Butler	:	A-2013-2344353
	:	
Susan Butler Reigeluth Living Trust	:	A-2013-2344604
	:	
Blueberry Mountain Realty, LLC	:	A-2013-2344605
	:	
Grumble Knot, LLC	:	A-2013-2344612
	:	
Pennsylvania Glacial Till, LLC	:	A-2013-2344616
	:	
Chris and Melinda Maros	:	
	:	
v.	:	C-2012-2305047
	:	
PPL Electric Utilities Corporation	:	
	:	
Joe and Vanessa Caparo	:	
	:	
v.	:	C-2012-2276713
	:	
PPL Electric Utilities Corporation	:	

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**PETITION TO INTERVENE  
TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC**

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Transcontinental Gas Pipe Line Company, LLC<sup>1</sup> (“Transco”), by and through its undersigned attorneys, SAUL EWING LLP, hereby files this Petition to Intervene in the above-captioned proceedings pursuant to the Rules of Practice and Procedure promulgated by the Pennsylvania Public Utility Commission, 52 Pa. Code §§5.71-76, and in accordance with the Notice published in the *Pennsylvania Bulletin* at 43 Pa. B. 397 (January 19, 2013) and Prehearing Order #1 issued by Administrative Law Judge David A. Salapa on January 8, 2013 and Prehearing Order #2 issued on January 29, 2013.

**I. INTRODUCTION**

On December 28, 2012, PPL Electric Utilities Corporation (“PPL” or “applicant”) filed an Application at Docket No. A-2012-2340872 (the “Siting Application”) with the Pennsylvania Public Utility Commission (the “Commission”) requesting authority to locate and construct the Pennsylvania portion of transmission lines associated with the proposed Northeast-Pocono Reliability Project (“Northeast Pocono Line”). PPL asserts that the Northeast Pocono Line is needed to resolve reliability and planning violations and to reinforce the 69 kV systems serving the Northeast Pocono region by bringing a new 230 kV supply source closer to the growing load centers. As part of the Application, PPL proposed three new transmission lines: (1) Jenkins-West Pocono Line; (2) West Pocono-North Pocono Line; and (3) North Pocono-Paupack Line.

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<sup>1</sup> Formerly Transcontinental Gas Pipe Line Corporation.

Separately, also on December 28, 2012, PPL filed two Petitions (the “Substation Petitions”) at Docket Nos. P-2012-2340871 and P-2012-2341105 requesting that the Commission approve the construction of buildings to shelter control equipment associated with the West Pocono and North Pocono substations, respectively.

Also, PPL filed 37 separate Applications (the “Eminent Domain Applications”) relating to the proposed exercise of the power of eminent domain arising from the project. Specifically, the Application at Docket No. A-2013-2341208 seeks authorization to utilize eminent domain to take property rights regarding properties owned by Transco.

## **II. TRANSCO’S INTEREST AND STANDING**

In support of this Petition to Intervene, Transco provides the following additional information:

1. The instant intervenor is Transcontinental Gas Pipe Line Company, LLC, with a business address at 2800 Post Oak Boulevard, Houston, Texas 77056.
2. The intervenor’s attorneys for the purpose of receiving service of all documents in this proceeding are:

Elizabeth U. Witmer, Esquire  
SAUL EWING LLP  
1200 Liberty Ridge Drive, Suite 200  
Wayne, PA 19087-5569  
(610) 251-5062  
(610) 408-4400 (fax)  
[ewitmer@saul.com](mailto:ewitmer@saul.com)

3. Counsel for intervenor is authorized to accept service on behalf of Transco in this proceeding. Transco requests that the Commission and all parties of record serve copies of all documents (including, but not limited to, correspondence, discovery requests and answers, commission orders, pleadings and testimony) electronically on its counsel of record as well as by hard copy.

4. Transco is the owner of real property in Buck Township, Luzerne County, by virtue of a Deed dated December 13, 2001, recorded in the Office of Recorder of Deeds of Luzerne County at Book 3002 Page 8544, being Tax Parcel No. K14 BA L16 (the "Transco Property").

5. A portion of the Transco Property is proposed to be condemned as described in the Eminent Domain Application by PPL.

6. As a result of PPL's decision to locate an electric line across Transco's property, Transco's property rights are adversely affected in that it may be unable to use and/or develop its property appropriately. Transco believes other feasible routes may be available for the proposed project. The facilities on the Transco Property are also subject to the exclusive jurisdiction and regulation of the Federal Energy Regulatory Commission ("FERC") and the United States Department of Transportation ("USDOT"), specifically the Pipeline and Hazardous Materials Safety Administration ("PHMSA").

7. Transco is an affected property owner whose rights will be adversely affected if the Commission grants PPL authority to locate, construct and operate the electric lines proposed in this action. Transco may be directly affected by the outcome of this proceeding and its interests are not adequately represented by existing participants. Transco therefore satisfies the standards for intervention established by the Commission. 52 Pa. Code §5.72(a).

8. In addition, pursuant to 52 Pa. Code §57.75(i)(3), as the owner of property which is the subject of the Eminent Domain Application at Docket No. A-2013-2341208, Transco has automatic standing to participate as a party with regard to the Application.

9. Transco's position in this proceeding is to ensure that PPL's proposed construction has no adverse impact on Transco's property rights, and on Transco's use, operation, maintenance or future development of the Transco Property, which is already developed with a building and appurtenant facilities, some of which may be affected by the proposed condemnation. The construction, operation and maintenance of Transco's facilities on the Transco Property are also subject to the exclusive jurisdiction of FERC, USDOT and PHMSA, and the construction, operation and maintenance of the facilities proposed by PPL cannot conflict with the federal regulation of Transco's facilities. Due to the early state of the proceeding, Transco reserves the right to finalize its position after it has had an opportunity to further evaluate PPL's filings, conduct discovery and review additional information that be provided, and to raise and/or address additional issues that may be identified by other parties.

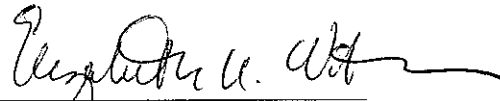
**III. CONCLUSION**

**WHEREFORE**, Transco respectfully requests that the Commission and the presiding Administrative Law Judge grant its Petition to Intervene with full party status in this proceeding.

Respectfully submitted,

**SAUL EWING LLP**

Dated: February 27, 2013



Elizabeth U. Witmer, Esquire  
PA Attorney ID No. 55808  
Saul Ewing LLP  
1200 Liberty Ridge Drive, Suite 200  
Wayne, PA 19087-5569  
(610) 251-5062  
(610) 408-4400 (fax)  
[ewitmer@saul.com](mailto:ewitmer@saul.com)



**VERIFICATION**

I, Douglas E. Anderson, of Transcontinental Gas Pipe Line Company, LLC state that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief. I understand that this Verification is made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

DATE: February 27, 2013

Douglas E. Anderson



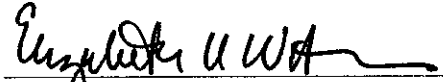
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Dianna L. Doss	: A-2013-2341214 : :
Donald Januszewski	: A-2013-2341215 : :
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Bradley D. Hummel	: A-2013-2341220 : :
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Roberta Searfoss a/k/a Judy Searfoss Executrix of the Estate of Euylla Hughes a/k/a Eylila Hughes	: A-2013-2341232 : : : :
John F. and Veronica Iskra	: A-2013-2341233 : :
Michael A. Mitch and Sue K. Mitch	: A-2013-2341234 : :
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Dietrich Hunting Club	: A-2013-2341237 : :
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Pennsylvania Glacial Till, LLC	: A-2013-2344616
Chris and Melinda Maros	: C-2012-2305047
v.	
PPL Electric Utilities Corporation	
Joe and Vanessa Caparo	
v.	
PPL Electric Utilties Corporation	: C-2012-2276713

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Petition to Intervene of Transcontinental Gas Pipe Line Company, LLC, has been served upon the following persons on the attached service list by First-Class Mail, postage prepaid, in accordance with the requirements of §1.54 (relating to service by a participant).

Dated: February 27, 2013



Elizabeth U. Witmer, Esquire  
PA Attorney ID No. 55808  
Saul Ewing LLP  
1200 Liberty Ridge Drive, Suite 200  
Wayne, PA 19087-5569  
(610) 251-5062  
(610) 408-4400 (fax)  
[ewitmer@saul.com](mailto:ewitmer@saul.com)

Pennsylvania Department of  
Environmental Protection  
P.O. Box 2063  
Market Street State Office Building  
Harrisburg, PA 17105-2063  
Attn. Office of Field Operations

Honorable Barry J. Schoch, PE, Secretary  
Pennsylvania Department of Transportation  
Commonwealth Keystone Building  
400 North Street, 9<sup>th</sup> Floor  
Harrisburg, PA 17120  
Attn. William J. Cressler, Chief Counsel

Pennsylvania Historical and  
Museum Commission  
Bureau for Historic Preservation  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120-0053  
Attn. Mr. Douglas C. McLearn, Chief

Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1925

Wayne County Planning Department  
925 Court Street  
Honesdale, PA 18431

Bear Creek Township Board of Supervisors  
3333 Bear Creek Boulevard  
Bear Creek Township, PA 19702

Office of Small Business Advocate  
Commerce Building  
300 North Street, Suite 1102  
Harrisburg, PA 17101

Lackawanna County Commissioners  
Lackawanna County Administration Bldg.  
200 Adams Avenue, 6<sup>th</sup> Floor  
Scranton, PA 18503

Lackawanna County Planning Commission  
135 Jefferson Avenue, 2nd Floor  
Scranton, PA 18503

Luzerne County Council  
Luzerne County Courthouse  
200 N. River Street  
Wilkes-Barre, PA 18911

Luzerne County Planning Commission  
20 N. Pennsylvania Avenue  
Wilkes-Barre, PA 18711

Monroe County Commissioners  
1 Quaker Plaza, Room 201  
Stroudsburg, PA 18360-2169

Monroe County Planning Commission  
1 Quaker Plaza, Room 106  
Stroudsburg, PA 18360-2169

Wayne County Commissioners  
Wayne County Courthouse  
925 Court Street  
Honesdale, PA 18431

Madison Township Planning Commission  
3200 Madisonville Road  
Madison Township, PA 18444

Bear Creek Township Planning Commission  
3333 Bear Creek Boulevard  
Bear Creek Township, PA 19702

Buck Township Board of  
Supervisors/Planning Commission  
114 Buck Boulevard  
Bear Creek, PA 18602

Clifton Township Board of Supervisors  
361 State Route 435  
Clifton Township, PA 18424

Clifton Township Planning Commission  
361 State Route 435  
Clifton Township, PA 18424

Covington Township Board of Supervisors  
20 Moffat Drive  
Covington Township, PA 18444

Covington Township Planning Commission  
20 Moffat Drive  
Covington Township, PA 18444

Lehigh Township Board of Supervisors  
32 Second Street  
PO Box 615  
Gouldsboro, PA 18424

Lehigh Township Planning Commission  
32 Second Street  
PO Box 615  
Gouldsboro, PA 18424

Madison Township Board of Supervisors  
3200 Madisonville Road  
Madison Township, PA 18444

Tobyhanna Township Board of Supervisors  
105 Government Center Way  
Pocono Pines, PA 18350

Paupack Township Board of Supervisors  
25 Daniels Road  
Lakeville, PA 18438

Paupack Township Planning Commission  
25 Daniels Road  
Lakeville, PA 18438

Plains Township Board of Supervisors  
126 North Main Street  
Plains, PA 18705

Plains Township Planning Commission  
126 North Main Street  
Plains, PA 18705

Salem Township Board of Supervisors  
PO Box 278  
Hamlin, PA 18427

Salem Township Planning Commission  
PO Box 278  
Hamlin, PA 18427

Sterling Township Board of Supervisors  
PO Box 100  
Sterling, PA 18463

Sterling Township Planning Commission  
PO Box 100  
Sterling, PA 18463

Thornhurst Township Board of Supervisors  
HC1 Box 238-B, River Road  
Thornburst, PA 18424-9313

Thornhurst Township Planning Commission  
HC I Box 238-B, River Road  
Thornhurst, PA 18424-9313

Tobyhanna Township Planning Commission  
105 Government Center Way  
Pocono Pines, PA 18350

Ronald Solt  
1200 Thornhurst Rd.  
Bear Creek Twp, PA 18702-8212

Attn: Thomas E., Mark M., and  
J. Dean Mack  
c/o Heather K  
281 Pierce Street  
Kingston, PA 18704

Attn: Anthony Jr. and Lillian Lupas et al  
65 W. Jackson St.  
Wilkes Barre, PA 18661

Jon F. and Veronica Iskra  
11 Green Arrow Trail  
White Haven, PA 18661

Eylla Hughes Est  
c/o Judy Scarfoss  
38 Buck Blvd.  
White Haven, PA 18661-2130

Transcontinental Gas Pipeline Co  
PO Box 2400 Md 46-4  
Tulsa, OK 74102-2400

David B. MacGregor  
Four Penn Center  
1600 John F. Kennedy Blvd.  
Philadelphia, PA 19103

Dictrick Hunting Club  
PO Box 39 Hooper John  
Clifford, PA 18413

International Consolidated Investment  
Company  
c/o Arthur Kania  
560 E. Lancaster Ave, Ste 108  
St. Davids, PA 19087

Sylvester J. Coccia  
310 W. Mary St.  
Old Forge, PA 18518

William Petroulcas & Joana Petrouleas  
5 Helena Road  
Staten Island, NY 10304

NLMS Inc  
1170 Winola Rd  
Clarks Summit, PA 18411

Clifton Acres Inc  
C/O Wayne Moore  
159 East Walton Place, Apt. 23  
Chicago, IL 60611

Art Mrtg Borrower Prope 2010-5  
10 Glenlake Pkwy S. Twr, Ste 800  
Atlanta, GA 30328

Fr First Ave Prop Holding LP  
c/o Jeffery R. Thomas  
2601 Market Place  
Harrisburg, PA 17110

US Industrial Reit II  
9830 Colonnade Blvd, Ste 600  
San Antonio, TX 78230

Fr E2 Property Holding LP  
311 S. Wacker Dr Ste 4000  
Chicago, IL 60606

Edward R. Schultz  
RR 1 Box 1360  
Gouldsboro, PA 18424



Christopher & Melinda Maros  
586 Twin Rocks Rd  
Newfoundland, PA 18445-2156

Margaret G. Arthur (Deceased)  
And Barbara A. Saurman, Trustees of the  
Residuary Trust of James C. Arthur  
11 Brownstone Dr.  
Horsham, PA 19044

Merel J. & Arlene J. Swingle  
51 Swingle Ln  
Lake Ariel, PA 18436

Bradley D. Hummel  
PO Box 733  
Hamlin, PA 18427-0733

Donald Januszewski  
517 Ledge Dale Rd.  
Lake Ariel, PA 18436-5571

Michael & Joanne Palermo  
52 Rowan Ave  
Staten Island, NY 10306-5273

Peter & Francine Palermo  
36 Rowan Ave  
Staten Island, NY 10306-5273

Ronald G. & Gloria Sidovar  
PO Box 190  
Hamlin, PA 18427-0190

John C. & Linda S. Justice  
23 Sledzinski Rd.  
Lake Ariel, PA 18436-6135

Three Griffins Enterprises Inc  
PO Box 136  
Hamlin, PA 18427-0136

Lawrence Dude  
30 Wilan Ln  
Albany, NY 12203-4431

Michael A. & Sue K. Mitch  
PO Box 428  
Treichlers, PA 18086-0428

Donald W. Henderson & Louis V. Bellucci  
7044 So Harbor Circle  
Stuart, FL 34996

Dianne L. Doss  
390 Nelson Rd  
Monroe, NY 0950-4248

James L. & Michaelene J. Butler  
9414 South Gary Avenue  
Tulsa, OK 74137

Susan Butler Living Trust  
Reigeluth  
HC 1 Box 1134  
Blakeslee, PA 18610

Grumble Knot LLC  
2642 Route 940  
Pocono Summit, PA 18346

Pennsylvania Glacial Till LLC  
PO Box 900  
Blakeslee, PA 18610

Blueberry Mountain Reality LLC  
57 Seaview Blvd  
Port Washington, NY 11050

Paul E. Russell, Esquire  
Associate General Counsel  
PPL Electric Utilities Corporation  
Two North Ninth Street  
Allentown, PA 18101

Honorable David Salapa  
PA Public Utility Commission  
Commonwealth Keystone Bldg.  
P.O. Box 3265  
Harrisburg, PA 17120