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February 14, 2018

VIA eFILING

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

**Re: Application of Transource Pennsylvania, LLC Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-East Project in Portions of York County, Pennsylvania
Docket No. A-2017-2640195**


**Application of Transource Pennsylvania, LLC Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection-West Project in Portions of Franklin County, Pennsylvania
Docket No. A-2017-2640200**

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced dockets is the **Petition to Intervene of PECO Energy Company**.

If you have any questions regarding this filing, please do not hesitate to contact me at 215-841-4353.

Very truly yours,



Jennedy S. Johnson

Enclosures

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of Transource Pennsylvania, :
LLC Filed Pursuant to 52 Pa. Code :
Chapter 57, Subchapter G, for Approval :
of the Siting and Construction of the : Docket No. A-2017-2640195
230 kV Transmission Line Associated :
With the Independence Energy :
Connection-East Project in Portions of :
York County, Pennsylvania :**

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Franklin County, Pennsylvania :**

**PETITION TO INTERVENE OF
PECO ENERGY COMPANY**

Pursuant to 52 Pa.Code §§ 5.72-74, PECO Energy Company (“PECO”) herby files this Petition to Intervene in the above-captioned proceedings. PECO has a direct and substantial interest in the issues raised in these proceeding because the Applications could result in Transource Pennsylvania, LLC (“Transource”) being granted the right to construct electric transmission facilities within PECO’s certificated service territory and connected to PECO infrastructure. Further, any modifications made to the underlying PJM Interconnection, L.L.C. (“PJM”) Market Efficiency Project during this proceeding could result in obligations for PECO and ultimately its customers. In support of this Petition, PECO states as follows:

1. PECO is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal office in Philadelphia, Pennsylvania. PECO furnishes electric

distribution service within its authorized service territory to approximately 1.6 million electric customers in Bucks, Chester, Delaware, Montgomery, and York Counties, and the City of Philadelphia. PECO is both a “public utility” and an “electric distribution company,” as defined in 66 Pa.C.S. Sections 102 and 2803, respectively.

2. On December 27, 2017, Transource filed with the Pennsylvania Public Utility Commission (“Commission”) two Applications for Approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection Project in portions of York and Franklin Counties, Pennsylvania (“Application”).¹

3. In its Application, Transource seeks Commission approval to implement a PJM Market Efficiency Project (the “Independence Energy Connection Project” or “IEC Project”) to alleviate transmission congestion. Application at 1. Specifically, under the IEC Project, Transource will construct, own, maintain, and operate two new electric transmission substations in Pennsylvania, as well as the Pennsylvania portions of two new 230kV interstate transmission lines – the Furnace Run-Conastone line (the “IEC-East Project”) and the Rice-Ringgold line (the “IEC-West Project”). *Id.* at 1-2.

4. The Commission’s Regulations permit a petition to intervene to be filed by any “person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought.” 52 Pa. Code § 5.72(a). Such party is eligible to intervene upon demonstrating “an interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.” *Id.* at § 5.72(a)(2)

¹ Transource requests that the two Siting Applications at Docket Nos. A-2017-2640195 and A-2017-2640200 be consolidated for the purposes of hearings and decisions. Application at 2.

5. A portion of the IEC Project, the Furnace Run-Conastone line, is slated to be constructed in PECO's service territory in southeastern York County. Application at 2; Attachment 3, pg. 57. While a portion of the IEC Project forming the basis of Transource's Application is located within PECO's service territory and will be connected to PECO facilities, Transource did not serve PECO with the filing.

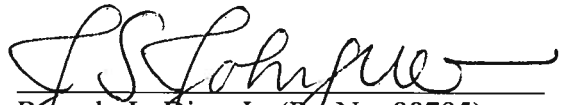
6. The Commission will evaluate Transource's Application under Sections 501 and 1501 of the Public Utility Code and its Regulations at 52 Pa. Code Section 57.71 *et seq.* The Commission's regulations state that it will not grant a siting application unless it finds that: (1) there is a need for it; (2) it will not create an unreasonable risk of danger to the health and safety of the public; (3) it is in compliance with applicable statutes and regulations providing for the protection of the natural resources of this Commonwealth; and (4) it will have minimum adverse environmental impact, considering the electric power needs of the public, the state of available technology, and the available alternatives. 52 Pa. Code § 57.76.

7. The Commission will also consider: (1) the present and future necessity of the proposed HV line in furnishing service to the public; (2) the safety of the proposed HV line; (3) the impact and the efforts which have been, and will be, made to minimize the impact, if any, of the proposed HV line upon land use, soil and sedimentation, plant and wildlife habitats, terrain, hydrology, landscape, archeologic areas, geologic areas, historic areas, scenic areas, wilderness areas, and scenic rivers; and (4) the availability of reasonable alternative routes. 52 Pa. Code § 57.75; *see also* 52 Pa. Code § 69.3105.

8. PECO is seeking party status in order to monitor the impacts of Transource's proposal on PECO customers and facilities.

9. PECO has a direct and substantial interest in the issues raised in this proceeding because a portion of the IEC Project would be connected to PECO infrastructure. Further, any modifications made to the IEC Project during this proceeding could result in obligations for PECO and ultimately its customers, and PECO may be bound by the action of the Commission in these proceedings. *See* 52 Pa. Code § 5.72(2)(2). Therefore, PECO's interest cannot be adequately represented by any other party in this proceeding, and PECO will be uniquely impacted by the developments in and the outcome of this proceeding.

10. For these reasons, PECO respectfully requests that the Commission grant this Petition to Intervene.



Romulo L. Diaz, Jr. (Pa. No. 88795)

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Jennedy S. Johnson (Pa. No. 203098)

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Dated: February 14, 2018

#4600098

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VERIFICATION

I, Douglas J. Dale, hereby declare that I am the Manager of Transmission Planning for PECO Energy Company; that as such I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Pleading are true to the best of my knowledge, information and belief, and that I make this verification subject to the penalties of 18 Pa. C.S. § 4904 pertaining to false statements to authorities.

Date: February 14, 2018



Douglas J. Dale
Manager, Transmission Planning

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Petition to Intervene of PECO Energy Company upon the parties of record in these proceedings in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the matter and upon the persons listed below via email and first class mail:

PARTIES IN DOCKET NUMBERS A-2017-2640195 and A-2017-2640200:

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17 North Second Street, 12th Floor
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