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February 20, 2018

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
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

Dear Secretary Chiavetta:

Pursuant to the Notice published in the *Pennsylvania Bulletin* on January 20, 2018, enclosed for filing is the Petition to Intervene of Mid-Atlantic Interstate Transmission, LLC in the above-referenced proceeding.

Please contact me if you have any questions.

Very truly yours,



Teresa K. Harrold

Enclosures

c: 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 230 kV Transmission Line Associated with the Independence Energy Connection-East Project in Portions of York County, Pennsylvania : : : : : : : : : : **Docket No. A-2017-2640195**

**PETITION TO INTERVENE OF
MID-ATLANTIC INTERSTATE TRANSMISSION, LLC**

Pursuant to Section 52 Pa. Code §§ 5.72–5.74, Mid-Atlantic Interstate Transmission, LLC (“MAIT”) hereby files this Petition to Intervene in the above-captioned proceeding. In support of this Petition, MAIT states as follows:

I. INTRODUCTION

1. On December 27, 2017, Transource Pennsylvania, LLC (“Transource”) filed an Application 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 (“Application”) at the Pennsylvania Public Utility Commission (“PUC” or “Commission”).

2. Notice was published in the *Pennsylvania Bulletin* on January 20, 2018, directing that formal protests and petitions to intervene be filed with the Commission on or before February 20, 2018.

3. MAIT is a certificated public utility providing interstate electric transmission service in Pennsylvania.

4. As proposed, MAIT does not take a position with regard to the Application. As the Commission proceeding progresses, however, other intervenors may propose changes to the Application that could impact MAIT. Accordingly, MAIT files this Petition to Intervene in the above-referenced proceeding consistent with the Commission's regulations at 52 Pa. Code §§ 5.72–5.74.

II. ELIGIBILITY TO INTERVENE

5. The Commission's regulation at 52 Pa. Code § 5.72 permits a petition to intervene to be filed by a "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).

6. A party is eligible to intervene under this section where it can demonstrate "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." 52 Pa. Code § 5.72(a)(2).

7. The Commonwealth Court held that intervention is proper where a party's interest in the proceeding is "substantial, immediate, and direct." *George v. Pa. Pub. Util. Comm'n*, 735 A.2d 1282, 1286 (Pa. Commw. Ct. 1999); *see also Re: Equitable Gas Co.*, 76 Pa. P.U.C. 23 (Opinion and Order dated Jan. 16, 1992).

8. Through this Application, Transource is seeking approval from the Commission to construct a 230 kV transmission line in York County, Pennsylvania. Application, p. 1. Transource is proposing to construct this line as part of its implementation of Baseline Upgrade Numbers

b2743 and b2752, which are market efficiency projects previously approved by PJM Interconnection, LLC (“PJM”). *Id.* at 9. Transource refers to its work on this project as the Independence Energy Connection Project (“Independence Project”), which it has further subdivided into east and west transmission line projects. *Id.* As part of the Independence Project, Transource is tasked with constructing new lines and substations in Pennsylvania and Maryland. *Id.* at 1-2. Under Baseline Upgrade Numbers b2743 and b2752, other utilities are also responsible for completing additional work and upgrades to support the Independence Project.

9. The Application that began the instant proceeding addresses the siting issues associated with the Independence East Project.¹ The Independence East Project proposes the location and construction of a 230 kV line approximately 12.7 miles in length between the Maryland border and the proposed Furnace Run substation. *Id.* at 2.

10. If the Independence East Project is approved, MAIT will be required to make relay upgrades at its substation facilities in Middletown, Pennsylvania. Similarly, any changes to the Independence East Project could impact the scope of the required upgrade work and would require MAIT to reevaluate the potential impacts of the Independence East Project on its facilities and operations.

11. Accordingly, MAIT has an interest in this proceeding that is substantial, immediate, and direct, and which may not be adequately represented by other participants in this proceeding. MAIT’s upcoming upgrade work will be necessary to ensure continued reliability once the Independence East Project is constructed. In addition, the review and disposition of the Application could modify the scope of MAIT’s upgrade work and would require MAIT to conduct

¹ A separate application was filed at Docket Number A-2017-2640200 to address the siting issues associated with the Independence West Project.

additional studies of the impact of the Independence East Project on MAIT's operations and facilities. As such, any modifications made to the Independence East Project during this proceeding will directly impact the future work of MAIT. No other party may adequately represent MAIT's interests in this proceeding as no other party is responsible for the same work resulting from the implementation of Baseline Upgrade Numbers b2743 and b2752. MAIT is uniquely impacted by the developments and outcome of this proceeding.

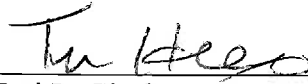
12. As proposed, MAIT does not take a position with regard to the Application. As the Commission proceeding progresses, however, other intervenors may propose changes to the Independence East Project that would impact the scope of MAIT's work and operations. To the extent changes are proposed, MAIT is seeking party status in order to monitor the proposed changes and modify its future operations and upgrade work accordingly.

13. For these reasons, MAIT's Petition to Intervene should be granted.

III. CONCLUSION

WHEREFORE, Mid-Atlantic Interstate Transmission, LLC respectfully requests that the Commission grant its Petition to Intervene.

Dated: February 20, 2018



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**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 230 kV :
Transmission Line Associated with the : Docket No. A-2017-2640195
Independence Energy Connection-East :
Project in Portions of York County, :
Pennsylvania :**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below.

Service by first class mail, as follows:

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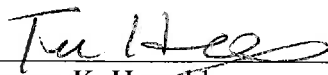
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Dated: February 20, 2018



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