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August 31, 2018

Via Electronic Filing

Rosemary Chiavetta, Secretary PA Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265

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 230kV Project in Portions of Franklin County, Pennsylvania Docket No. A-2017-2640200

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

Dear Secretary Chiavetta:

Attached for filing is a Motion of Intervenor, Stop Transource Franklin County, to Compel Complete Discovery Responses from Transource Pennsylvania, LLC to be filed in the above-referenced matter. Thank you.

CURTIN & HEEFNER LLP

BY:

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Counsel for Stop Transource Franklin County

cc: Honorable Elizabeth H. Barnes Honorable Andrew M. Calvelli Certificate of Service

CERTIFICATE OF SERVICE

Consolidated Docket Nos. A-2017-2640200 and A-2017-2640195

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

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By:_

JOANNA A. WALDRON

Date: August 31, 2018

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania, LLC

Filed Pursuant to 52 Pa. Code Chapter 57, : Docket No. A-2017-2640195

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 of Transource Pennsylvania, LLC

Filed Pursuant to 52 Pa. Code Chapter 57, : Docket No. A-2017-2640200

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

MOTION OF INTERVENOR, STOP TRANSOURCE FRANKLIN COUNTY, TO COMPEL COMPLETE DISCOVERY RESPONSES FROM TRANSOURCE PENNSYLVANIA, LLC

Intervenor, Stop Transource Franklin County ("STFC"), by and through its attorneys, respectfully requests that Administrative Law Judge Elizabeth H. Barnes and Administrative Law Judge Andrew M. Calvelli compel Transource Pennsylvania, LLC ("Transource") to provide complete responses and complete productions of documents in response to specific discovery requests of STFC, as well as executed Verifications that are required by the 52 Pa. Code §§ 1.36 and 5.342(a)(6). STFC respectfully submits that the responses of Transource to Interrogatory ("INTR") No. 16 and the production of documents in response to Request for Production ("RPD") Nos. 5 and 26, have been woefully inadequate to date, despite repeated requests that they be supplemented. In support of this motion, STFC states as follows:

I. BACKGROUND

On April 18, 2018, STFC served two sets of discovery requests upon Transource in this matter: a First Set of Interrogatories and a First Request for Production of Documents. True and correct copies of these discovery requests are attached hereto as **Exhibit A** (Interrogatories) and **Exhibit B** (Document Requests), respectively.

On May 9, 2018, Transource served its responses to a limited number of the First Set of Interrogatories and First Request for Production of Documents of STFC (the "Initial Responses"). True and correct copies of these Initial Responses (excluding attachments provided on disc) are attached hereto as **Exhibit C** (Partial Response to Interrogatories) and **Exhibit D** (Response to Document Requests), respectively. On June 11, 2018, Transource served responses on the remaining portions of the First Set of Interrogatories. True and correct copies of this Partial Response to the First Set of Interrogatories (excluding any attachments provided on disc) is attached hereto as **Exhibit E**.

On June 27, 2018, the undersigned counsel for STFC wrote to counsel for Transource, highlighting with particularity the myriad deficiencies in Transource's initial discovery responses. A true and correct copy of this June 27, 2018 correspondence (the "Deficiency Letter") is attached hereto as **Exhibit F**. Among other shortcomings that existed at the time, the Deficiency Letter focused upon:

(i) the refusal of Transource to produce Pennsylvania Historical Museum Commission ("PHMC") information requested in RPD No. 5, purportedly based on concerns that such information was "confidential," notwithstanding that a

- Protective Order had already been entered and signed by the parties in this case to address such concerns;
- (ii) Transource's unfounded objections and refusals to produce documents related to 'water wells hydrologically connected to the proposed right of way," requested in RPD No. 26;
- (iii) Transource's failure to provide a substantive response to INTR No. 16;
- (iv) a refusal by Transource to produce documents related to IEC West Field Work, including in connection with 9 surveys that Transource acknowledges having conducted, purportedly because final reports have not yet been completed; and
- (v) Transource has not produced signed Verifications to accompany discovery responses, as required.

The parties conferred by phone regarding these discovery deficiencies (and others) on July 10, 2018, and Transource was allowed additional time in which to supplement its Initial Responses and to produce additional responsive documents in an attempt to avoid motion practice. Transource produced its supplemental responses on July 27, 2018, which addressed some of the deficiencies that had been raised by STFC, but failed to address many others. A true and correct copy of the Supplemental Responses to STFC's Document Production Requests ("Supplemental Responses") is attached hereto as **Exhibit G** and Supplemental Responses to STFC's Interrogatories is attached hereto as **Exhibit H**.

Following multiple back-and-forth communications concerning the adequacy of the Initial Responses and the Supplemental Responses, Transource confirmed on or about August 17, 2018 that it would not serve any additional supplemental responses to the STFC discovery requests. Having exhausted all efforts in good faith to resolve the outstanding discovery

disputes, STFC now files this Motion and requests the entry of an Order to Compel Transource to produce the remaining responsive documents and information.

II. LEGAL STANDARD

The Public Utility Commission's ("Commission's") regulations regarding discovery requests provides a broad scope of discovery. *City of Pittsburgh v. Pennsylvania Public Utility Com'n*, 526 A.2d 1243, 1249 (Pa. Commw. Ct. 1987). Discovery is permitted of "any matter, not privileged, which is relevant to the subject matter involved in the pending action." 52 Pa. Code § 5.321(c). Transource is required to answer discovery requests fully and completely, in the absence of an objection, and to answer those parts or subparts of interrogatories to which it has no objection. 52 Pa. Code § 5.342(a)(4). Moreover, when a party fails or refuses to answer interrogatories, the Commission's procedural regulations provide for the imposition of sanctions. 52 Pa. Code §§ 5.371, 372 (a)(3) and (4)("catch-all" provision allowing for an order which is just).

III. MOTION TO COMPEL

A. The response of Transource to RPD No. 5 is inadequate in multiple respects.

STFC RPD No. 5 requested "[a]ll documents that refer to, relate to, or constitute in any way Investigation Materials pertaining to the Project Study Area". *See* Exhibit B, at p.6. The term "Investigation Materials" is a defined broadly in the interrogatories to include, among other things, "data, analysis, studies, models or modeling...sampling, protocols,...summary reports,

draft or interim reports or analysis, results of ...sampling or tests of environmental media or human health..." *Id.* at p. 3. The Project Study Area is a defined term as well. *Id.* at p. 4.

In its Initial Response dated May 9, 2018, Transource objected to RPD No. 5 as being "overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence." *See* Exhibit D, at Data Request STFC-01D-05. Notwithstanding this objection, Transource acknowledged that it had "completed several field reviews" and agreed to produce to STFC documents related to those field reviews. It did not indicate at the time whether additional field reviews or surveys had been commissioned, commenced, undertaken or completed by Transource.

1. Transource has improperly refused to produce documents related to at least nine (9) types of surveys that it admits it has conducted, solely based on the fact that it is still working on final draft survey reports.

In the June 27, 2018 Deficiency Letter and separately in correspondence with counsel, STFC has asserted that the responses of Transource to RPD No. 5 were incomplete in that, among other things, there were additional surveys and studies being undertaken by Transource for which no documents had been produced.

In its Supplemental Responses dated July 27, 2018, Transource reiterated its objection to RPD No. 5 as being "overly broad, irrelevant and unlikely to lead to the discovery of admissible

evidence." However, notwithstanding those objections, it provided the following supplemental information:

...The following field work has been completed for the IEC West Project, however, reports based on that field work are currently being drafted and will be supplied in a supplemental response at a later date:

- 1) Bald Eagle Nest Survey
- 2) Lance leaf buckthorn surveys
- 3) Northeastern bulrush surveys
- 4) Cultural resource surveys
- 5) Bat surveys
- 6) Eastern spadefoot toad habitat screening
- 7) Wetland delineation surveys (STFC 01D-03 Attachment 5)
- 8) Property boundary surveys (STFC 01D-03 Attachment 6)
- 9) Soil borings (STFC 01D-03 Attachment 4)

See Exhibit G, STFC-01D-05.

This Supplemental Response of Transource to RPD No. 5 is inadequate on its face. STFC has explicitly requested *all* documents that refer to, relate to, or constitute "Investigation Materials" pertaining to the Project Study Area. The requested documents expressly include drafts and underlying survey data, not just final reports or surveys. While STFC acknowledges and accepts the commitment by Transource to produce final surveys or reports when and if they are completed in the future, that does not relieve Transource of its obligation right now to produce documents and material in its possession that are responsive to RPD No. 5. STFC respectfully requests that Transource be ordered to produce immediately all such materials that it has not already produced, in addition to whatever final reports or surveys may be created in the future.

2. Transource has objected and refused to produce requested PHMC information on the purported basis that it is "confidential"; however, STFC has signed the Protective Order entered in this matter which removes "confidentiality" as a basis for withholding responsive information

Transource also objected to RPD No. 5 to the extent it related to Pennsylvania Historic and Museum Commission ("PHMC") information. It stated, "A historic resources review is also being conducted for areas within a half mile of the preliminary project alignment...The results of these surveys are confidential and are not provided in this response." Transource referenced three exhibits which it allege provide the basis of the confidentiality claim. *See* Exhibit D, and STFC-01D-05, Attachments 1-3. True and correct copies of the Attachments 1-3 are attached hereto as **Exhibit I**.

The objection on the grounds of "confidentiality" is specious, as Transource well knows. The Deficiency Letter emphasized that "STFC has signed the Protective Order in this proceeding which allows for exchange of information that otherwise would be confidential. STFC is entitled to this information under 52 Pa. Code §5.321." See Exhibit F. The Right to Know Law as referenced in the History Code provision that Transource provided in connection with its objection has no application in this proceeding, where the parties are operating under the Commission's discovery regulations. See Exhibit I. The Commission's regulations adopt a scope of discovery consistent with the Pennsylvania Rules of Civil Procedure. See, e.g., 52 Pa. Code § 5.323 (stating that discovery shall be "consistent with the Pa.R.C.P. 4003.3"). "Discovery conducted in a court of law and a request made under the RTKL are wholly separate processes." Office of District Attorney of Philadelphia v. Bagwell, 155 A.3d 1119, 1139 (Pa. Commw. Ct. 2017), appeal denied, 174 A.3d 560 (Pa. 2017) Transource's attempt to rely on "the policy behind the exemptions contained in the RTKL" because the argument "serves [its] argument against disclosure in litigation," is predicted and rejected in Bagwell, where the court warned "the fact that information may not be publicly accessible under the RTKL does not answer the question of whether the information is relevant to a matter before the court in litigation...". Id.

Transource has not relented, standing by its objection to the production of PHMC on grounds of confidentiality. STFC respectfully submits that the "confidentiality" objection is not sustainable, that the Administrative Law Judges assigned to this matter have already addressed that objection by entering the Protective Order dated March 14, 2018 in this matter, and that the PHMC materials must be produced in accordance with the terms and conditions of that Protective Order.

C. Transource has refused to provide requested documents that refer or relate to the location of all water wells that are hydrologically connected to the proposed right-of-way

STFC's RPD No. 26 requested that Transource produce "[a]ll documents that refer or relate to the location of all water wells that are hydrologically connected to the proposed right-of-way." *See* Exhibit B at p.9.

The Initial Response of Transource to RPD No. 26 stated as follows: "Transource has objected to Question No. 26 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence." *See* Exhibit D. Notwithstanding this objection, Transource referred STFC to its response to RPD No. 25, which stated only, "[t]o the Company's knowledge, there are no water wells within the proposed right-of-way..." *See* Exhibit D. RPD had not asked about water wells that are "hydrologically connected to the proposed right-of-way", and Transource provided no information or documents concerning such water wells. Thus, the response to RPD No. 26 provided no substantive information in response.

The Deficiency Letter highlighted this shortcoming, and demanded a supplemental response. *See* Exhibit E. None of the documents or information requested in RPD No. 26 was provided by Transource thereafter.

STFC respectfully requests that Transource be ordered to provide the documents and information that have been requested in RPD No. 26, specifically related to water wells that are "hydrologically connected to the proposed right-of-way." To the extent no such wells exist, or that Transource has not conducted such investigation to discover such wells, Transource can confirm that fact in a supplemental response.

D. Transource failed to provide the requested information in response to INTR No. 16; then, when STFC demanded that the missing information be supplied in a supplemental response, Transource provided a "Supplemental Response" that was identical to the original one.

STFC's INTR No. 16 asked Transource to "[d]escribe and identify all of the efficiency projects that AEP and GPE 'annually manage' and what is the dollar amount of those efficiency projects as referenced by Ms. Simmons on P.9, line 19." Transource's response did not object to INTR No. 16 on any ground, but that response evaded completely the questions that had been asked:

Please refer to Ms. Simmons' testimony at page 9, line 19. The statement indicating that AEP and GPE annually manage more than \$2 billion in projects and have extensive experience in projects of a magnitude comparable to the Independence Energy Connection project refers to transmission projects in general and is not limited to market efficiency projects. General information about these projects, which varies over time, is available publicly, for example, at [http://aeptransmission.com]"

See Exhibit C.

Transource's answer to INTR No. 16 did not identify or describe the efficiency projects that AEP and GPE annually manage, as requested. It did not provide dollar amounts paid for the management of those projects, as requested. It provided none of the information requested whatsoever. The Deficiency Letter explicitly addressed the shortcomings in this "answer" and demanded a supplemental response. *See* Exhibit F, at p.3.

A Supplemental Response to INTR No. 16 was provided by Transource on July 27, 2018, but it was "supplemental" in name only. The wording of the response was identical to the wording of the original response to INTR No. 16. It provided none of the information that had been requested in INTR No. 16.

STFC submits that INTR No. 16 requested information that is relevant to claims and defenses in this matter and was not objected to by Transource, but the information requested therein has not been provided by Transource. STFC respectfully requests the entry of an order to compel Transource to provide immediately all information in its possession which is responsive to INTR No. 16, or, if no such information exists, to confirm that it has not managed any efficiency projects.

E. Despite repeated requests, Transource has not supplied the required executed Verifications to accompany its discovery responses

When Transource produced its Initial Responses to the discovery requests of STFC in May of 2018, those Initial Responses did not include the verifications that are required under 52 Pa. Code §§1.36 and 5.342(a)(6). Similarly, no verifications were provided when Transource produced its Supplemental Responses on or about July 27, 2018. The undersigned counsel has followed up to request those verifications, but they have not been supplied to date.

Accordingly, STFC respectfully requests that an order be entered requiring Transource to provide the requisite signed verifications to accompany its Initial Responses and Supplemental Responses immediately.

IV. CONCLUSION

For all the foregoing reasons, STFC respectfully requests that Administrative Law Judge Elizabeth H. Barnes and Administrative Law Judge Andrew M. Calvelli enter an order to

compel Transource Pennsylvania, LLC to produce complete responses to STFC Requests for Production of Documents No. 5 and No. 26, together with all documents responsive to those requests, as well as complete responses to STFC Interrogatory No. 16, together with all required, executed verifications, within seven (7) days.

CURTIN & HEEFNER LLP

Bv:

Jordan B. Yeager (Pa. I.D. No. 72947)

Mark L. Freed (Pa. I.D. No.63860)

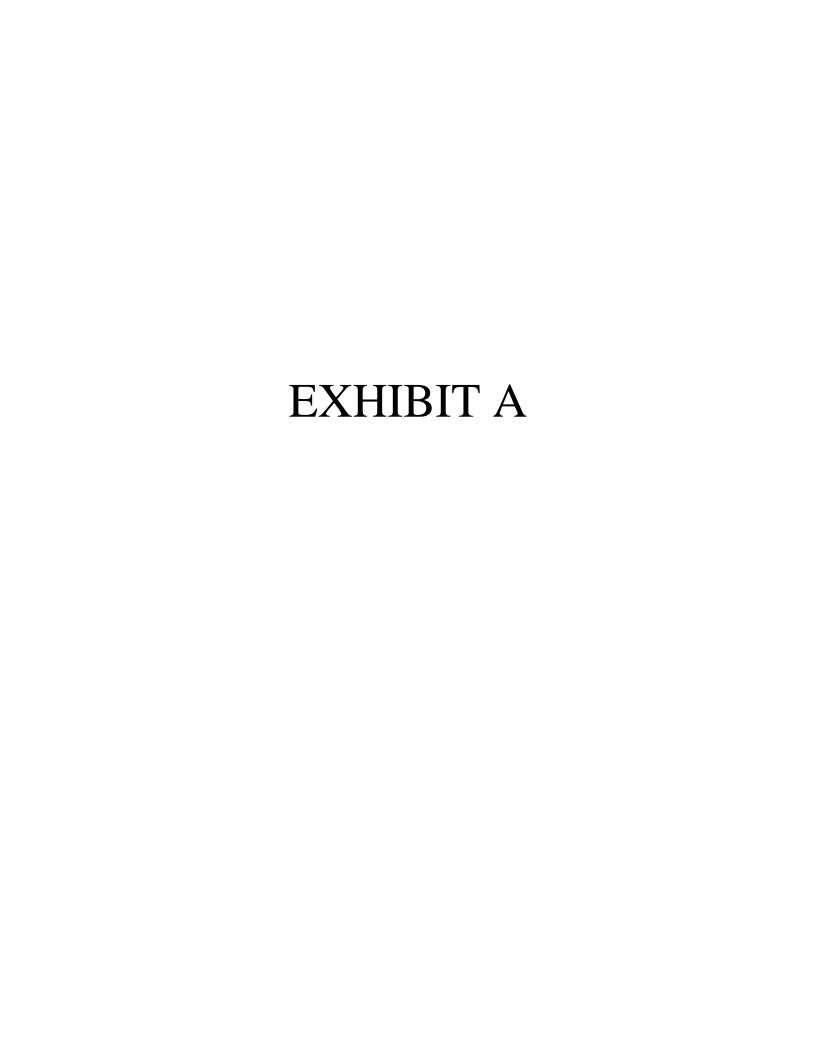
Joanna A. Waldron (Pa. I.D. No. 84768)

2005 South Easton Road, Suite 100

Doylestown, PA 18901

11

Dated: August 31, 2018



BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania, LLC

Filed Pursuant to 52 Pa. Code Chapter 57,

Docket No. A-2017-2640195

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-2017-2640200

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

STOP TRANSOURCE FRANKLIN COUNTY'S FIRST SET OF INTERROGATORIES TO TRANSOURCE

Stop Transource Franklin County direct this set of interrogatories to Transource Pennsylvania, LLC ("Transource" or "Applicant") pursuant to 52 Pa. Code §§ 5.321, 324, 341 and 342. Your responses are due within (20) days. Each interrogatory is to be verified by the responding witness in accordance with 52 Pa. Code § 5.342(a)(6).

In answering these interrogatories, please furnish all information available to you, including information in possession of your attorneys, or person acting on their behalf, and all persons acting on your behalf. If you cannot answer the interrogatories in full after exercising due diligence to secure the information, so state and answer to the extent possible, specifying the reason for your inability to answer the remainder and stating whatever information or knowledge that you do have concerning the unanswered portions.

These interrogatories are to be considered continuing, and you are request to provide, by way of supplementary answers, such additional information as you or any other person acting on your behalf may hereafter obtain, which information might augment or otherwise might modify your answers now given. Such supplementary responses are to be served upon Intervenor Stop Transource Franklin County's counsel within thirty (30) days after receipt of such information, and in no event later than (2)) days prior to the date set for the evidentiary hearing in this matter.

Definitions:

- 1. "And" shall also mean "or" and vice versa.
- 2. "Any" shall also mean "all" and vice versa.
- 3. "Communication" shall mean any transmission of information, the information transmitted, and any process by which information is transmitted, and shall include written, electronic and oral communications.
- 4. "Document" or "Documents" means all material coming within the scope of Rule 4009.1 of the Pennsylvania Rules of Civil Procedure.
- 5. "Identify" when used in reference to a natural person means to state the person's full name, business and home address, business telephone number, present or last known title or business position and employer or other business affiliation.
- 6. "Identify" when used in reference to a document or to a communication contained in a document means to:
 - (1) State the title or other description of the document;
 - (2) State the date of the document;
 - (3) Identify the author and each recipient and addressee and all persons who also received copies of the document; and

- (4) State the identification number, if any, of the document.
- 7. "Person" means a natural person, partnership, association, corporation, or government agency.
- 8. "Relate To" or "Related To" (or a form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, analyzing, noting, embodying, containing, mentioning, studying, recording, discussing, evaluating, or relevant to. As indicated, the term necessarily includes information which is in opposition to as well as in support of the positions or claims you make in the Application.
- 9. "State the legal basis" means set forth the specific constitutional, statutory, and regulatory provision(s), and the provision(s) of any other legal document, that you rely upon in asserting a claim or position.
- 10. "State the factual basis" means (a) set forth each item of information upon which the contention, claim, conclusion or finding to which it pertains is based, and (b) with respect to each such item of information, Identify (as defined herein) and describe each source thereof, including but not limited to each Document, oral communication, act, action, activity, accounting, negotiation, practice, process, occurrence, occasion, course of conduct, happening, relationship, scheme, conference, discussion, development, service, instance, incident, event calculation and computation upon which you rely with respect thereto. The terms "basis," "factual basis," and "fact" mean each item of information, including but not limited to actions, inactions, communications, documents, and policies, upon which the allegation, contention, claim or demand referred to in the Interrogatory is based.
 - 9. "You" or "Your" refers to Transource Pennsylvania, LLC.

10. "Siting Application" shall mean the Application and the Attachments in Support of Certification Application, submitted by Transource Pennsylvania, LLC and dated December 26, 2017.

INTERROGATORIES

1. Identify all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the Siting Study Independence Energy Connection (West) Rice-Ringgold 230kV Transmission Line Project, prepared by AECOM, dated December 2017 (hereinafter "Siting Study") including every person having knowledge of the facts and circumstances of the preparation of the Siting Study. ANSWER:

2. For each person identified in response to Interrogatory No. 1 above, please describe the source and substance of each person's knowledge.

3.	Identify all persons other than counsel of record for Transource, who directly
participated in the preparation of the answers to these interrogatories.	
ANSWER:	

4. Identify each person that you expect to call as a witness in any hearing, evidentiary or public input hearing, including all fact and expert witnesses, and identify the subject matter on which the person is expected to testify.

ANSWER:

- 5. For each expert witness that you expect to call:
 - a. State the substance of the facts and opinions to which each expert is expected to testify and summarize the ground for each opinion;
 - b. All documents or communications relied on by each expert and consultant in reaching his or her opinion(s).; and
 - c. List the educational background, employment in the last ten (10) years, present employment and all texts, articles, reports, theses, or other publications of each expert which related to the matters upon which the witness will be offered as an expert in this matter.

- 6. For witness Peggy I. Simmons, please identify:
 - a. all documents or communications relied on in preparing her witness statement;
 - b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement:
 - c. list all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

ANSWER:

- 7. For the witness Kamran Ali, please identify:
 - a. all documents or communications relied on in preparing his witness statement;
 - b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement:
 - c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

- 8. For the witness Paul F. McGlynn, please identify:
 - a. all documents or communications relied on in preparing his witness statement;
 - b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement:
 - c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

ANSWER:

- 9. For witness Barry A. Baker, please identify:
 - a. all documents or communications relied on in preparing his witness statement;
 - b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement:
 - c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

- 10. For witness Kent M. Herzog, please identify:
 - a. all documents or communications relied on in preparing his witness statement;
 - b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement:
 - c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

ANSWER:

- 11. For the witness Thomas Schaffer, please identify:
 - a. all documents or communications relied on in preparing his witness statement;
 - b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement:
 - c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

12. Please identify each and every communication that you or any of your consultants, including, but not limited to AECOM, have had related to each and every permit listed in the Preliminary Permit Matrix, Attachment 6 of the Siting Application and produce any documents that in any way reference those communications.

ANSWER:

13. Please identify and describe any communications you, or any party on your behalf, has had with the Pennsylvania State Historic Preservation Office since the March 6, 2017 letter from the SHPO, including any communication that has occurred since the filing of the Siting Application, and produce any documents that in any way reference those communications.

14.	Identify any meetings that took place with Pennsylvania Department of	
	al Protection ("PA DEP"), identify all persons present, and what topics and permits	
were discusse	cu.	
ANSWER		
15.	Identify all individuals who are or were part of the "Siting Team" as referenced in	
Paragraph 34	of the Application, and identify their employer, title and role on the Siting Team.	
	or the rippirousers, and rawning their employer, and the series and series are series are series ar	
ANSWER:		
16.	Describe and identify all of the efficiency projects that AEP and GPE "annually	
manage" and what is the dollar amount of those efficiency projects as referenced by Ms.		
Simmons on P. 9, line 19.		
ANSWER		

17. Identify all projects to which Ms. Simmons refers in her statement at P. 9, that comprise the "extensive experience" in "projects of a magnitude comparable," and define "magnitude" in this statement.

ANSWER:

- 18. With respect to GPE and AEP's history of "siting, designing, constructing and operating transmission grids consisting of approximately 44,000 miles of transmission lines," from Ms. Simmons statement at P. 9, identify the following:
 - a. which lines are dual 230kV lines or greater;
 - b. where any and all 230kV or greater lines are located;
 - c. when those lines were built; and
- d. what amount of the 44,000 miles of transmission lines were built to "alleviate congestion constraints."

19.	Identify the incumbent entities that Ms. Simmons refers to in Footnote 1 on page
11, with resp	ect to upgrades at existing transmission facilities in Pennsylvania.
ANSWER:	
20.	Please identify the "Project Director" who has been assigned to oversee the IEC-
West Project	and when he or she was assigned, as referenced in Ms. Simmons' statement at P.
16.	
ANSWER:	
21.	Identify any and all "detailed work plans" developed by the Project Manager and
	"schedule based upon the specific project requirements" developed by the Project
Manager in 6	existence, as referenced in Ms. Simmons' Statement at P. 16.
ANSWER:	

22.	Please identify the following individuals by name, as referenced in Ms. Simmons	
statement at P.16-17:		
a. b. c.	"Construction Manager" "Inspection Team" "Construction Project Management Team."	
ANSWER:		
23.	For the individuals identified in the above answer, list the qualifications and	
experience of each with respect to the building of substations and transmission towers.		
ANSWER:		
24.	Identify the incumbent(s) for which Transource PA will "provide a	
dedicated/assigned phone number which will be monitored" as referenced by Ms. Simmons at		
P. 18.		
ANSWER:		

25.	Please identify the maximum width that the proposed right-of-way would occupy,
referenced by	Ms. Simmons in her statement at p. 19 as "approximately 130 feet, 65 feet either
side."	
ANSWER:	
26.	Identify all generators on the PJM grid who can "participate in competitive
wholesale ma	arket to supply electricity," as referenced by Mr. Ali at P. 4.
ANSWER:	
27.	Identify each and every instance in the last ten (10) years in which PJM has
"identifie[d]	a need to relieve congestion on electric transmission facilities," as referenced in Mr.
Ali's testimo	ny at P. 4.
ANSWER:	

28.	Identify all of the "Market Efficiency Projects" for which PJM has opened a Long	
Term Prop	osal Window, and describe which have been built and where those Market Efficiency	
Projects have been built in the last 10 years.		
ANSWER:		
29.	Identify each and every additional analysis conducted by PJM as referenced in	
Mr. Ali's s	statement at P. 5 as "customary" and "periodic," and describe the results of that	
analysis th	at PJM has conducted for the IEC-West, or IEC-East of Combined IEC Project.	
ANSWER	:	
30	. Identify any and all "specific areas" in which there is "heavy use" of the	
transmissi	on facilities for the IEC Project, as referenced by Mr. Ali at P. 6.	
ANSWER	::	

21	II (C. 4) C. A. Lange with January that is appropriated from "Florying
31.	Identify the origin of the lower-priced energy that is prevented from "flowing
freely" on the	e grid, as referenced by Mr. Ali at P. 6.
ANSWER:	
32.	Identify each and every transmission line that lower priced energy flows on, as
described by	Mr. Ali at P 6-7.
ANSWER:	
33.	Identify each and every "congested facility" that the proposals 2014/15 RTEP
Long Term F	Proposal Window addressed, as referenced in Mr. Ali's Statement, p. 7, lines 7-8.
ANSWER:	

34. Please identify any each and every individual from AECOM who worked on the Siting Study in any capacity and describe his or her role in the study.

ANSWER:

35. Identify each and every time that the proposed Route was unable to use parallel alignments along existing utility rights –of—way or other infrastructure, such as roadways and railroads, as discussed by Mr. Baker on P. 9.

ANSWER:

CURTIN & HEEFNER LLP

Y:CV

Jordan B. Yeager (Pa. I.D. No. 72947)

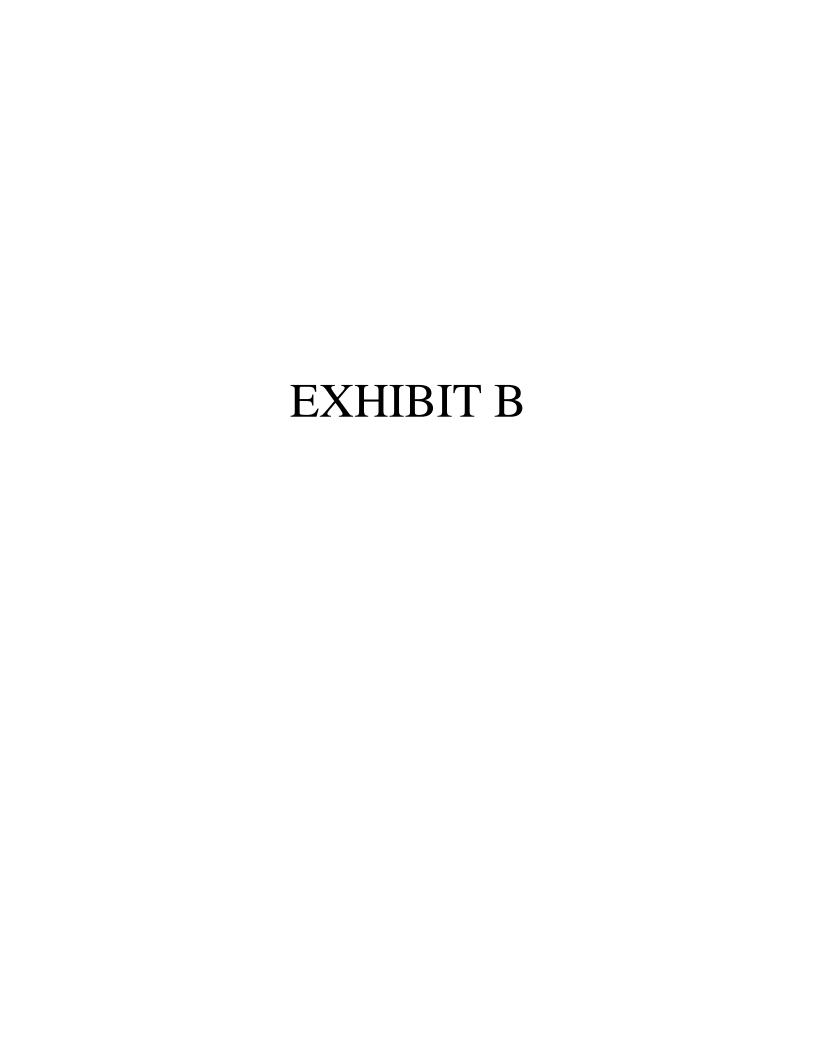
Mark L. Freed (Pa. I.D. No. 63860)

Joanna A. Waldron (Pa. I.D. No. 84768)

2005 South Easton Road, Suite 100

Doylestown, PA 18901

Dated: April 18, 2018



BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania, LLC

Docket No. A-2017-2640195 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

Application of Transource Pennsylvania, LLC

Docket No. A-2017-2640200 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

FIRST REQUEST TO TRANSOURCE PENNSYLVANIA, LLC FOR PRODUCTION OF **DOCUMENTS**

Pursuant to 52 Pa. Code §§ 5.321, 5.349(a)(1) and Pa.R.C.P. 4009.1 and 4009.11, Intervenor Stop Transource Franklin County, by its counsel, requests that Transource Pennsylvania, LLC ("Transource" or "Applicant") produce the documents described below for inspection and copying or for inspection via accurate, scanned copies on CDs, at the law office of Curtin & Heefner LLP, 2005 S. Easton Road, Suite 100, Doylestown, Pennsylvania, 18901. Please produce all requested documents within twenty (20) days of service of this request.

DEFINITIONS

The term "document" is used in its customary broad sense, whether recorded, filmed or reproduced by any mechanical process, or written or produced by hand, and whether an original, master, or copy, and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise. "Document" includes, without limitation, the

following items: agreements; books; records; letters; accounts; notes; summaries; forecasts; appraisals; surveys; Investigation Materials and correspondence as defined below; estimates; diaries; desk calendars; reports; communications; cablegrams; radiograms; telegrams; telexes; facsimiles; memoranda; intra-office memoranda; testimony; summaries; notes and records of telephone conversations, meetings and conferences; notes and records of personal conversations or interviews; ledgers; invoices; receipts; order forms; purchase orders; change orders; order confirmations; reservations; orders; shipping logs; packing slips; contracts; notices; drafts of any documents; marginal or other comments or notes appearing on any documents; business records; charts; maps; plans; diagrams; specifications; schedules; press releases; computer printouts; emails; text messages; Internet postings; webpages; instant messages or similar online real-time discussions (including transcripts from such discussions), including without limitation Gmail Chat, Google Hangout, Messenger, Facebook messages, and Skype; transcripts of voicemails; screenshots; word processing documents; computer files; any documents stored on a hard drive, online, or in the cloud; computer tapes, discs, and diskettes; flash drives; microfilm; microfiches; active, archival, and/or residual electronic information; photographs; slides, negatives; motion pictures; video, graphic or oral recordings or representations of any kind, including without limitation, tapes, cassettes, cartridges, discs, YouTube or other Internet videos, chips, records and transcriptions thereof; data compilations from which information can be obtained, translated, if necessary, by you through detection devices into reasonably usable form; and any other information containing paper, writing or physical thing in the actual or constructive possession, custody or control of you, or any of your agents, representatives or attorneys.

The term "in the cloud" shall include without limitation Google Drive, Google Keep, Dropbox, SkyDrive, iCloud, Amazon Cloud Drive, SugarSync, network-attached storage or NAS, file servers, and all similar websites, servers, and storage services or providers.

The term "agent" shall mean past or present agents or representatives, including any attorneys, accountants, consultants, and independent contractors or subcontractors.

"Correspondence" shall include but not be limited to: letters; e-mails; text messages; notes; intra-office memoranda; facsimiles; instant messages or similar online real-time discussions (including transcripts from such discussions); notes or other records of telephone conversations, meetings and conferences; notes and records of personal conversations or interviews; transcripts or other records of voicemails; Internet postings; and press releases.

"Investigation Materials" shall include but not be limited to: data, analysis, studies, models or modeling, characterization, sampling, protocols, methods, sample plans, sample results, and diagrams; log books or sheets; concentration histories; summary reports; draft or interim reports or analyses; quality assurance/quality control ("QA/QC") information; results of water, air, soil, noise, or other sampling or tests of environmental media or human health, including air dispersion modeling; and meteorological data; air and water monitoring data; baseline testing; wetlands delineations; biological assessments; and water chemistry data.

"Applicant" shall mean Transource Pennsylvania, LLC and any of its agents.

"Application" shall mean the 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, Pa. PUC Docket No. A-2017-2640200.

"Pertaining to," "with regard to," "in connection with," "relating to," "referring to" (or any form thereof) shall mean constituting, reflecting, respecting, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating, or relevant to.

"IEC-West Project" shall mean the Independence Energy Connection Project, including all associated infrastructure and the proposed Rice Substation.

"Siting Study" shall mean the Siting Study Independence Energy Connection (West)
Rice-Ringgold 230kV Transmission Line Project, prepared by AECOM, dated December 2017,
and any udpates thereto.

"Project Study Area" shall mean the Project Study Area, as identified in the Siting Study.

"You" and "Your" shall mean Transource Pennsylvania, LLC, and any representative, employee, agent or attorney thereof.

INSTRUCTIONS

- 1. In the event that more than one copy of a document exists, the original shall be produced, as well as every copy on which appears any notation or marking of any sort not appearing on the original. For any documents which are stored or maintained in files in the normal course of business, such documents shall be produced in such files, or in such a manner as to preserve and indicate the file from which such documents were taken.
- 2. If any part of this request for documents is deemed to call for the production of any privileged materials and such privilege is asserted, a list is to be furnished identifying each document so withheld together with the following information:
 - (a) the reason for withholding;
- (b) a statement of facts constituting the basis for any claim of privilege, work product or other ground on non-disclosure;
 - (c) a brief description of the document, including;
 - (i) the date of the document;
- (ii) the names of its author, authors, or preparers and an identification by employment and title of each such person;

- (iii) the names of each person who was sent or who has had access to, or custody of the document, together with an identification of each such person;
 - (iv) the paragraph to this request to which the document relates; and
- (v) in the case of any document relating in any way to a meeting or conversation, identification of such meeting or conversation.
- 3. If any documents requested herein have been lost or destroyed, the documents so lost or destroyed shall be identified by author, date and subject matter.
- 4. This request shall be deemed continuing so as to require further and supplemental production if additional documents falling within its scope are obtained between the time of initial production and the time of hearing or trial.
- 5. Whenever a request for documents is framed in the disjunctive it shall also be taken in the conjunctive and vice versa.
- 6. Whenever a request for documents is framed in the singular, it shall also be taken in the plural, and vice versa.
- 7. The use of any tense or any verb shall be considered also to include within its meaning all other tenses of the verb so used.
- 8. With respect to each request herein to produce all documents, you are requested to identify and produce all documents (as defined herein above without limitation) which are known to you or which can be located or discovered by reasonable diligent effort, regardless of location, in your possession, custody or control, including, without limitation, all such documents requested to be produced which are in the files (whether personal, business or any other files), possession, custody or control of your attorneys, accountants, agents, consultants, representatives, officials, or employees.

Stop Transource requests that you produce the following:

- 1. All documents that refer or relate in any way to PJM's Market Efficiency Project 9A ("Project 9A.")
- 2. All documents that refer to, relate to in any way, or constitute in any way the Siting Study.
- 3. All documents that constitute Investigation Materials pertaining to surface water, groundwater, air, and/or soil quality at, around, in close proximity to, or affected by the IEC-West Project.
- 4. All documents that refer or relate to waters of the Commonwealth, as defined in the Clean Streams Law, at, around, in close proximity to the Project Study Area, including location and inventory of such waters.
- 5. All documents that refer to, relate to, or constitute in any way Investigation Materials pertaining to the Project Study Area.
- 6. All documents that refer or relate to how the Project 9A and/or the IEC-West Project can or could affect surface water, groundwater, air, and/or soil quality, and/or health of humans, wildlife, and/or aquatic life.
- 7. All documents that refer or relate to groundwater in the Project Study Area, including but not limited to flow and infiltration paths and patterns, the water table, the aquifer system(s), and soil and/or geologic characteristics.
- 8. All documents that refer to or relate to any agricultural soils, and any soils identification or sampling collected for, or related to, the Project Study Area or Project 9A.
- 9. All documents that refer to or constitute in any way communications between you and the Pennsylvania Department of Environmental Protection about permits, applications, and/or review related to the IEC-West Project or the Siting Study.

- 10. All documents that refer to or constitute in any way communications between you and the U.S. Army Corps of Engineers, about permits, applications, or reviews related to the IEC-West Project or the Siting Study.
- 11. All documents that refer to or constitute in any way communications between you and the U.S. Fish and Wildlife Service about permits, applications, or reviews related to the IEC-West Project or the Siting Study.
- 12. All documents that refer to or constitute in any way communications between you and the Pennsylvania Fish and Boat Commission, about permits, applications, or reviews related to the IEC-West Project or the Siting Study.
- 13. All documents that refer to or constitute in any way communications between you and the Pennsylvania Game Commission about permits, applications, or reviews related to the IEC-West Project or the Siting Study.
- 14. All documents that refer to or constitute in any way communications between you and the Pennsylvania Department of Conservation and Natural Resources about permits, applications, or reviews related to the IEC-West Project or the Siting Study.
- 15. All documents that refer to or constitute in any way communications between you and the Pennsylvania Historical and Museum Commission about permits, applications, or reviews related to the IEC-West Project or the Siting Study.
- 16. All documents that refer to or constitute in any way communications between you and the Pennsylvania Department of Agriculture about permits, applications, or reviews related to the IEC-West Project or the Siting Study.
- 17. All documents that refer to or constitute in any way communications between you and the Franklin County Conservation District about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

- 18. All documents that refer to or constitute in any way communications between you and any other state, federal, or local agency about permits, applications, or reviews related to the IEC-West Project or the Siting Study.
- 19. All documents relating to the April 10, 2017 meeting at the office of the Pennsylvania Department of Agriculture involving Laurie Spears, Doug Wolfgang, Barry Baker and Dave Yenzuita.
- 20. All documents relating to the March 8, 2017 meeting at the office of Franklin County Planning Commission involving Laurie Spears, Barry Baker, Dave Yezuita, Phil Tarquino, Rochelle Barvincheck and Elizabeth Grant.
- 21. All documents relating the September 20, 2017 meeting at Pennsylvania

 Department of Conservation and Natural Resources Bureau of Forestry, with Laurie Speers,

 Barry Baker, Heather Spears, Chris Plank, Dave Mong, Roy Brubaker and Rebecca Bowen.
- 22. The Human Use and Ecologic Impacts study that was performed for the Susquehanna-Roseland powerline, and was emailed to Heather Brewster on September 21, 2017 by Christopher Plank.
- 23. The Map emailed to Heather Brewster by Hathaway Jones of the USDA/NRCS on August 31, 2017 "showing easements in the proximity/close to the proposed pipeline."
- 24. All attachments referenced in the November 8, 2017 letter of Heather Brewster to Hathaway Jones, of the USDA/NRCS regarding Natural Resources Conservation Service Agricultural Easements, including the Proposed Route Aerial Maps, Shapefile of Proposed Routes w/Parcel Data, List of Notified Landowners with Parcel Data, and Agricultural Easement Deeds.
- 25. All documents that refer or relate to the water wells on properties within the proposed right-of-way.

26. All documents that refer or relate to the location of all water wells that are

hydrologically connected to the proposed right-of-way.

27. All documents that refer to, relate to, or constitute in any way facts, investigation,

reviews, inquiries, communications regarding the Application, including Project 9A, or the

Siting Study.

28. All tangible evidence constituting, relating to, or referring to the facts and/or

circumstances described in the Siting Application or Witness Statements.

29. All documents you intend to present at any hearing in this matter.

30. All reports and witness statements of any experts or witnesses you intend to have

testify at any hearing in this matter.

CURTIN & HEEFNER LLP

Jordan B. Yeager (Pa. I.D. No. 72947)

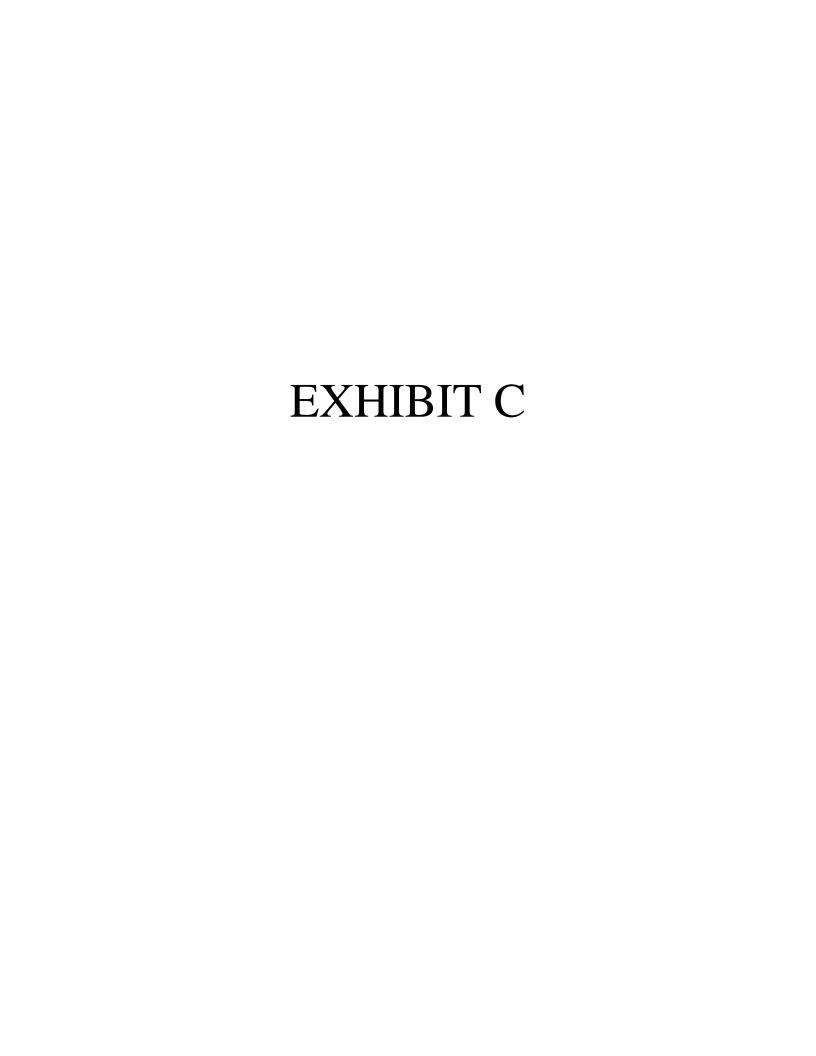
Mark L. Freed (Pa. I.D. No.63860)

Joanna A. Waldron (Pa. I.D. No. 84768)

2005 South Easton Road, Suite 100

Doylestown, PA 18901

Dated: April 18, 2018





17 North Second Street 12th Floor Harrisburg, PA 17101-1601 717-731-1970 Main 717-731-1985 Main Fax www.postschell.com

Lindsay A. Berkstresser

Iberkstresser@postschell.com 717-612-6021 Direct 717-731-1985 Direct Fax File #: 166570

May 9, 2018

VIA E-MAIL & REGULAR MAIL

Jordan B. Yeager, Esquire Mark L. Freed, Esquire Joanna A. Waldron, Esquire Curtin & Heefner LLP 2005 S. Easton Road, Suite 100 Doylestown, PA 18901

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 Counsel:

Enclosed are the Responses of Transource Pennsylvania, LLC to the Interrogatories of Stop Transource Franklin County – Set I, Nos. 1–5, 12–17, and 19–20, 21 (CONFIDENTIAL) and 22–35 in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Sineerely,

Lindsay A. B LAB/jl

ALLENTOWN HARRISBURG LANCASTER PHILADELPHIA PITTSBURGH PRINCETON WASHINGTON, D.C.

A PENNSYLVANIA PROFESSIONAL CORPORATION

Bukstresser

Jordan B. Yeager, Esquire Mark L. Freed, Esquire Joanna A. Waldron, Esquire May 9, 2018 Page 2

Enclosures

cc: Certificate of Service Rosemary Chiavatta, Secretary (Letter & Certificate of Service Only)

CERTIFICATE OF SERVICE Docket Nos. A-2017-2640195 & A-2017-2640200

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

Dianne E. Dusman, Esquire Darryl Lawrence, Esquire Phillip D. Demanchick, Esquire David T. Evrard, Esquire Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923

Sharon E. Webb, Esquire Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, PA 17101

Romulo L. Diaz, Jr., Esquire Jack R. Garfinkle, Esquire Jennedy S. Johnson, Esquire PECO Energy Company 2301 Market Street Philadelphia, PA 19103 PECO

Jordan B. Yeager, Esquire Mark L. Freed, Esquire Joanna A. Waldron, Esquire Curtin & Heefner LLP 2005 S. Easton Road, Suite 100 Doylestown, PA 18901 Stop Transource Franklin County

Teresa K. Harrold, Esquire FirstEnergy Service Company 2800 Pottsville, Pike, PO Box 16001 Reading, PA 19612-6001 MAIT Kimberly A. Klock, Esquire Amy E. Hirakis, Esquire PPL Services Corporation Two North Ninth Street Allentown, PA 18101 PPL Electric Utilities Corporation

Karen O. Moury, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
Maple Lawn Farms, Inc., Rose Tree-Blue
Mountain Hunt Club, Inc. &
Citizens to STOP Transource

Thomas J. Sniscak, Esquire Whitney E. Snyder, Esquire 100 North Tenth Street Harrisburg, PA 17101 York County Planning Commission

Linus E. Fenicle, Esquire Reager & Adler, PC 2331 Market Street Camp Hill, PA 17011 Quincy Township

VIA FIRST CLASS MAIL

Byron Jess Boyd 831 New Park Road New Park, PA 17352

Hugh McPherson 2885 New Park Road New Park, PA 17352

J Ross McGinnis, Esquire 41 West Main Street Fawn Grove, PA 17321

Barron Shaw Jana Shaw 445 Salt Lake Rd Fawn Grove, PA 17321

Fred Byers 1863 Coldsmith Rd Shippensburg, PA 17257

Michael Cordell 4219 Altenwald Rd Waynesboro, PA 17268

Roy Cordell Emma Cordell 4690 Fetterhoff Chapel Road Chambersburg, PA 17202

Aaron Kauffman Melinda Kauffman 4220 Old Scotland Rd Chambersburg, PA 17202

Colt Martin Kristyn Martin 8020 Hidden Valley Rd Waynesboro, PA 17268 Leonard Kauffman Mary Kauffman 4297 Olde Scotland Rd Chambersburg, PA 17202

Allen Rice Lori Rice 1430 Henry Lane Chambersburg, PA 17202

Lois White 1406 Walker Road Chambersburg, PA 17202

Willa Weller Kaal 67 Summer Breeze Lane Chambersburg, PA 17202

Allan Stine Heather Stine 867 Cider Press Road Chambersburg, PA 17202

Karen Benedict Rodney Myer 5413 Manheim Rd Waynesboro, PA 17268

Lantz Sourbier Laura Sourbier 64 Edgewood Cir Chambersburg, PA 17202

Ashley Hospelhorn 8010 Hidden Valley Ln Waynesboro, PA 17268

Ashley Hospelhorn 116 West 3rd Street Waynesboro, PA 17268 Danielle Bernecker 1827 Wood Duck Dr E Chambersburg, PA 17202

Courtney & Derek Dettinger 24 Chanceford Rd Brogue Pa 17309 James McGinnis, Jr. 290 Woolen Mill Road New Park, PA 17352

Darwyn Benedict 410 N. Grant Street Waynesboro, PA 17268

Date: May 9, 2018

Lindsay A. Berkstresser

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-01:

Identify all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the Siting Study Independence Energy Connection (West) Rice-Ringgold 230kV Transmission Line Project, prepared by AECOM, dated December 2017 (hereinafter "Siting Study") including every person having knowledge of the facts and circumstances of the preparation of the Siting Study.

Response:

Please see STFC 01-1 Attachment 1 for a list of individuals that contributed to or assisted in the preparation of the Siting Study for the IEC West Project. Additional personnel who may have performed incidental tasks but did not contribute to the decisions reflected in the Siting Study are not included. Similarly, support personnel assisting counsel of record and the Company's counsel are also not included.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-02:

For each person identified in response to Interrogatory No. 1 above, please describe the source and substance of each person's knowledge.

Response:

Please see the Company's response to STFC 01-1 and the referenced STFC 01-1 Attachment 1.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request	STFC-01-03
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Identify all persons other than counsel of record for Transource, who directly participated in the preparation of the answers to these interrogatories.

Response:

The following persons directly participated in the preparation of the answers to these interrogatories. Additional personnel who may have performed incidental tasks but did not contribute to the content reflected in the of the answers to these interrogatories are not included. Similarly, support personnel assisting counsel of record, PJM's Counsel, and the Company's counsel are also not included.

Barry Baker

Heather Brewster

Nicole Burfeind

Rob Everard

Craig Lockwood

Paul McGlynn

Peggy Simmons

Laurie M. Spears

Stephen P Stein

Refer to the Company's response to STFC 01-1 for additional details concerning each person.

Witness: Counsel

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-04:

Identify each person that you expect to call as a witness in any hearing, evidentiary or public input hearing, including all fact and expert witnesses, and identify the subject matter on which the person is expected to testify.

Response:

Other than the written testimony that has been submitted in support of the Company's application, the information requested has not been determined at this time. The Company will comply with the requirements regarding factual and expert witnesses in accordance with the applicable rules of procedure and the scheduling order in the case.

Witness: Counsel

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-05:

For each expert witness that you expect to call:

- a. State the substance of the facts and opinions to which each expert is expected to testify and summarize the ground for each opinion;
- b. All documents or communications relied on by each expert and consultant in reaching his or her opinion(s).; and
- c. List the educational background, employment in the last ten (10) years, present employment and all texts, articles, reports, theses, or other publications of each expert which related to the matters upon which the witness will be offered as an expert in this matter.

Response:

Other than the written testimony that has been submitted in support of the Company's application, the information requested has not been determined at this time. The Company will comply with the requirements regarding factual and expert witnesses in accordance with the applicable rules of procedure and the scheduling order in the case.

Witness: Counsel

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-12:

Please identify each and every communication that you or any of your consultants, including, but not limited to AECOM, have had related to each and every permit listed in the Preliminary Permit Matrix, Attachment 6 of the Siting Application and produce any documents that in any way reference those communications.

Response:

Please refer to the documents provided in the Siting Application, Attachment 12 and responsive documents provided by the Company under STFC 01D.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-13:

Please identify and describe any communications you, or any party on your behalf, has had with the Pennsylvania State Historic Preservation Office since the March 6, 2017 1etter from the SHPO, including any communication that has occurred since the filing of the Siting Application, and produce any documents that in any way reference those communications.

Response:

Transource notes its objection to STFC-01-13. Without waiving this objection, the Company provides the following response.

Please refer to the Company's response to STFC 01D-15.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-14:

Identify any meetings that took place with Pennsylvania Department of Environmental Protection ("PA DEP"), identify all persons present, and what topics and permits were discussed.

Response:

Please refer to the Company's response to STFC 01D-9.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-15:

Identify all individuals who are or were part of the "Siting Team" as referenced in Paragraph 34 of the Application, and identify their employer, title and role on the Siting Team.

Response:

Please see the Company's response to STFC 01-1 including STFC 01-1 Attachment 1.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-16:

Describe and identify all of the efficiency projects that AEP and GPE "annually manage" and what is the dollar amount of those efficiency projects as referenced by Ms. Simmons on P. 9, line 19.

Response:

Please refer to Ms. Simmons' testimony at page 9, line 19. The statement indicating that AEP and GPE annually manage more than \$2 billion in projects and have extensive experience in projects of a magnitude comparable to the Independence Energy Connection Project refers to transmission projects in general, and is not limited to market efficiency projects. General information about these projects, which varies over time, is available publicly, for example, at [http://aeptransmission.com/].

Interrogatories of Stop Transource in Franklin County Set 1

(Responses dated 5/8/2018)

Data Request STFC-01-17:

Identify all projects to which Ms. Simmons refers in her statement at P. 9, that comprise the "extensive experience" in "projects of a magnitude comparable," and define "magnitude" in this statement.

Response:

Please refer to the testimony of Ms. Simmons at page 9. The term "magnitude" has its plain meaning as used in the context in which it was stated. Transource PA's IEC project involves the construction of two transmission substations and two overhead double-circuit 230 kV interstate transmission lines, one of approximately 24.4 miles in Pennsylvania (28.8 miles overall), and the other of approximately 12.7 miles in Pennsylvania (15.8 miles overall). By way of comparison, the Wyoming-Jacksons Ferry 765 kV line, constructed by a Transource PA affiliate relying on resources as those described in Ms. Simmons' testimony, is 90 miles long and of a higher voltage than Transource PA's IEC project. For additional information, please refer to the Company's response to STFC 01-16.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-19:

Identify the incumbent entities that Ms. Simmons refers to in Footnote 1 on page 11, with respect to upgrades at existing transmission facilities in Pennsylvania.

Response:

Penelec (First Energy); PECO (Exelon).

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-20:

Please identify the "Project Director" who has been assigned to oversee the IECWest Project and when he or she was assigned, as referenced in Ms. Simmons' statement at P. 16.

Response:

Stephen P. Stein is the Project Director and he has been assigned to the project during the PJM Competitive 2014-2015 window bid process.

Data Request STFC-01-21 Attachment 1

Docket Nos. A-2017-2640195 & A-2017-2640200

Page 1 of 1

Redacted Public Version

This document has been redacted in its entirety.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-22:

Please identify the following individuals by name, as referenced in Ms. Simmons statement at P.16-17:

- a. "Construction Manager"
- b. "Inspection Team"
- c. "Construction Project Management Team."

Response:

The individuals have not yet been hired or assigned for the requested positions.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-23:

For the individuals identified in the above answer, list the qualifications and experience of each with respect to the building of substations and transmission towers.

Response:

The individuals have not yet been hired or assigned for the requested positions.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-24:

Identify the incumbents) for which Transource PA will "provide a dedicated/assigned phone number which will be monitored..." as referenced by Ms. Simmons at P. 18.

Response:

Please refer to the Company's response to STFC 01-19 for the requested information.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-25:

Please identify the maximum width that the proposed right-of-way would occupy, referenced by Ms. Simmons in her statement at p. 19 as "approximately 130 feet, 65 feet either side."

Response:

Based on the current design for the Project, the permanent right-of-way is planned to be approximately 130 feet.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-26:

Identify all generators on the PJM grid who can "participate in competitive wholesale market to supply electricity," as referenced by Mr. Ali at P. 4.

Response:

Transource notes that it has objected to Question 26.

In order to respond to Question 26, Transource must identify every generator on the PJM grid who can participate in the competitive wholesale market to supply electricity. Not only is this information not readily maintained, compiling a complete list is an impossible task because the number of potential participants in infinite. Transource cannot possibility be expected identify every generator who could participate in the PJM competitive wholesale market. Such a request would be extremely time-intensive and unduly burdensome, especially in light of the low probative value of this information. The information requested would encompass any existing or future generator in PJM and is in no way relevant to the project that is being proposed in the Siting Application.

The information requested is not maintained as requested. The Company further states that generators, and more specifically their generating units, can participate in PJM's competitive wholesale market to supply electricity to the extent they have satisfied PJM's business rules, including necessary Regional Transmission Expansion Plan ("RTEP") process requirements, in accordance with PJM Manual 14A, "New Services Request Process" which is available at the following link: [http://pjm.com/-/media/documents/manuals/m14a.ashx]. Therefore, there is no limit to the information requested. The Company further states that the referenced testimony does not relate to specific generators, but rather to the fact that PJM's transmission grid provides the means for generators (i.e., those who have satisfied the requirements as described in PJM Manual 14A) to participate in PJM's competitive wholesale market to supply electricity.

Witness: Kamran Ali

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-27:

Identify each and every instance in the last ten (10) years in which PJM has "identifie[d] a need to relieve congestion on electric transmission facilities," as referenced in Mr. Ali's testimony at P. 4.

Response:

The testimony referenced is a general statement; for additional information regarding the fact that in addition to its reliability analysis, PJM's RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that has economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies, please refer to PJM Manual 14B, at [http://www.pjm.com/~/media/documents/manuals/m14b.ashx].

Please also refer to the market efficiency analysis update reports from PJM's Transmission Expansion Advisory Committee ("TEAC"), which are generally available for the time period requested at [http://www.pjm.com/committees-and-groups/committees/teac.aspx]. Additional information about congestion costs is available from the State of the Market reports available at [http://www.monitoringanalytics.com/reports/PJM_State_of_the_Market/2017.shtml], and similar resources at [http://www.monitoringanalytics.com/home/index.shtml].

Specifically pertaining Project 9A, of which the IEC Project is the core component, please refer to the congestion costs analysis for the AP South Reactive Interface that were presented in the November 2014 TEAC slides, available at the following link: [http://pjm.com/-/media/committees-groups/committees/teac/20141111/20141111-market-efficiency-update.ashx. See slide 9 for the AP South Reactive Interface].

Witness: Kamran Ali

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-28:

Identify all of the "Market Efficiency Projects" for which PJM has opened a Long Term Proposal Window, and describe which have been built and where those Market Efficiency Projects have been built in the last 10 years.

Response:

There is no such thing as "all of the "Market Efficiency Projects" for which PJM has opened a Long Term Proposal Window." PJM opens a Long-Term Proposal Window to solicit market efficiency projects to address identified congestion issues; not the other way around.

Please refer to STFC I-28 Attachment 1 for a list of PJM Board-approved market efficiency projects arising out of competitive windows since 2013. The 2013 Market Efficiency Proposal Window was the first of such proposal window opened by PJM. The 2014/2015 Long Term Proposal Window, in which Project 9A was submitted, was the first of such proposal window opened by PJM subsequent to FERC's Order 1000.

Witness: Paul F. McGlynn

Approved Project	PJM Baseline ID Number(s)	PJM Market Efficiency Windows	PJM Board Approval Date	Project Status
Install 2nd Hunterstown 230/115 kV transformer, Reconductor Hunterstown - Oxford 115 kV line, Replace the Hunterstown 115 kV breaker '96192' with 40 kA rated breaker	b2452, b2452.1, b2552.3	2013 Market Efficiency Proposal Window (Conducted prior to the implementation of Order No. 1000)	2/11/2014	In Service
Reconductor two spans of the Graceton - Safe Harbor 230 kV transmission line including termination point upgrades.	b2690	2014/15 RTEP Long Term Proposal Window	10/15/2015	
Reconductor three spans limiting Brunner Island - Yorkana 230 kV line; add one breaker to Brunner Island switchyard; upgrade associated terminal equipment.	b2691	2014/15 RTEP Long Term Proposal Window	10/15/2015	In Service
Replace terminal equipment at AEP's Danville and East Danville substations to improve thermal capacity of Danville - East Danville 138 kV circuit	b2697.1, b2697.2	2014/15 RTEP Long Term Proposal Window	10/15/2015	
Replace relays at AEP's Cloverdale and Jackson's Ferry substations to improve the thermal capacity of Cloverdale - Jackson's Ferry 765 kV line	b2698	2014/15 RTEP Long Term Proposal Window	10/15/2015	
Tap the Conemaugh - Hunterstown 500 kV line and build new 230 kV double circuit line between Rice and Ringgold. Build new 230 kV double circuit line between Furnace Run and Conastone. Rebuild of the Conastone - Northwest 230 kV line. Replace the Ringgold #3 and #4 transformers with 230/138 kV autotransformers Ringgold bus reconfiguration. Reconductor of Ringgold-Catoctin 138 kV. [Transource 9A project.]	b2743, b2752	2014/15 RTEP Long Term Proposal Window	8/2/2016	
Replace L7915 B phase line trap at Wayne substation	b2693	2014/15 RTEP Long Term Proposal Window	10/15/2015	
Mitigate sag limitations on Loretto - Wilton Center 345 kV Line and replace station conductor at Wilton Center	b2728	2014/15 RTEP Long Term Proposal Window	2/15/2016	In Service
Replace station equipment at Nelson, ESS H- 471 and Quad Cities; upgrade conductor ratings of Cordova - Nelson, Quad Cities - ESS H- 471 and ESS H-471 - Nelson 345 kV lines and mitigatw sag limitations	b2692.1, b2692.2	2014/15 RTEP Long Term Proposal Window	10/15/2015	
Increase ratings of Peach Bottom 500/230 kV transformer to 1479 MVA normal/1839 MVA emergency	b2694	2014/15 RTEP Long Term Proposal Window	10/15/2015	

Approved Project	PJM Baseline ID Number(s)	PJM Market Efficiency Windows	PJM Board Approval Date	Project Status
Reconductor approximately 7 miles of the Woodville - Peters (Z-117) 138 kV circuit; reconfigure West Mifflin-USS Clairton(Z-15) 138 kV circuit to establish Dravosburg-USS Clairton(Z-14) 138 kV circuit and West Mifflin-Wilson(Z-15) 138 kV circuit; upgrade terminal equipment on Woodsville – Peters 138kV circuit (Structure 27A).	b2689.1, b2689.2, b2689.3	2014/15 RTEP Long Term Proposal Window	10/15/2015	Under Construction/I n Service
Rebuild Worcester - Ocean Pine 69 kV circuit No. 1 to 1400 Amp capability summer emergency rating	b2695	2014/15 RTEP Long Term Proposal Window	10/15/2015	In Service
Lincoln Substation: Upgrade the bus conductor and replace CTs.Germantown Substation: Replace 138/115 kV transformer with a 135/180/224 MVA bank. Replace Lincoln 115 kV breaker, install new 138 kV breaker, upgrade bus conductor and adjust/replace CTs. Carroll Substation: Replace the Germantown 138 kV wave trap, upgrade the bus conductor and adjust CT ratios.	b2688.1, b2688.2, b2688.3	2014/15 RTEP Long Term Proposal Window	10/15/2015	
Upgrade 138 kV substation equipment at Butler, Shanor Manor and Krendale substations. New rating of line will be 353 MVA summer normal/422 MVA emergency	b2696	2014/15 RTEP Long Term Proposal Window	10/15/2015	
Optimal Capacitors Configuration: New 175 MVAR 230 kV capacitor bank at Brambleton substation; new 175 MVAR 230 kV capacitor bank at Ashburn substation; new 300 MVAR 230 kV capacitor bank at Shelhorn substation; new 150 MVAR 230 kV capacitor bank at Liber	b2729	2014/15 RTEP Long Term Proposal Window	2/15/2016	
Upgrade capacity on E. Frankfort-University Park 345kV		2016/17 RTEP Long Term Proposal Window	10/18/2017	
Upgrade equipment at Pontiac Midpoint substation to increase capacity on Pontiac-Brokaw 345 kV line.	b2931	2016/17 RTEP Long Term Proposal Window	10/18/2017	
Reconductor the Conastone to Graceton 230 kV 2323 & 2324 circuits; Replace sevren disconnect switches at Conastone Substation; Add bundled conductor on the Graceton-Bagley-Raphael Road 2305 & 2313 230kV circuits; Replace short segment of conductor on the Windy Edge to Glenarm No. 110512 115kV circuit; Reconductor the Raphael Road - Northeast 2315 & 2337 230kV circuits		2016/17 RTEP Long Term Proposal Window	4/10/2018	

Approved Project	PJM Baseline ID Number(s)	PJM Market Efficiency Windows	PJM Board Approval Date	Project Status
Upgrade terminal equipment at Tanners Creek 345kV station. Upgrade 345kV Bus and Risers at Tanners Creek for the Dearborn circuit.		2016/17 RTEP Long Term Proposal Window Addendum A	12/5/2017	

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-29:

Identify each and every additional analysis conducted by PJM as referenced in Mr. Ali's statement at P. 5 as "customary" and "periodic," and describe the results of that analysis that PJM has conducted for the IEC-West, or IEC-East of Combined IEC Project.

Response:

PJM has conducted two re-evaluations of Project 9A, of which the IEC project is the core component, presented at the September 2017 and February 2018 TEAC meetings. Please refer to the Company's responses to OCA I-19 Attachment 1, containing the September 14, 2017 PJM TEAC Market Efficiency Update. Please also refer to the February 8, 2018 PJM TEAC Market Efficiency Update, available at [http://pjm.com/-/media/committees-groups/committees/teac/20180208/20180208-teac-market-efficiency-update.ashx]. Please also refer to, generally and for example, the Company's responses to OCA I-19, OCA III-2, OCA IV-12, OCA IV-13, OCA IV-16, OCA IV-44, OCA V-01, OCA IX-10.

Witness: Paul F. McGlynn

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-30:

Identify any and all "specific areas" in which there is "heavy use" of the transmission facilities for the IEC Project, as referenced by Mr. Ali at P. 6.

Response:

The language quoted refers to the definition of congestion in the context of market efficiency transmission upgrades, such as the IEC Project. The phrase "'specific areas' in which there is 'heavy use'" of the transmission facilities for the IEC Project is unintelligible because of the term "transmission facilities for the IEC Project." The Project, as a component of Project 9A, relieves congestion on transmission facilities, and was submitted in PJM's 2014/2015 Long Term Window to address congestion on the AP South Reactive Interface. Please refer to the Company's response OCA IV-07. Please also refer, for example, to the Company's responses to OCA I-18, OCA IV-04, OCA IV-08, OCA IX-01, and OCA IX-02. The Company further notes that in the context of PJM's market efficiency analysis, congestion shifts are considered in the evaluation of the selected solution (in this case Project 9A) in addition to the relief of the target congestion driver (in this case congestion on the AP South Reactive Interface).

Witness: Paul F. McGlynn and Kamran Ali

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-31:

Identify the origin of the lower-priced energy that is prevented from "flowing freely" on the grid, as referenced by Mr. Ali at P. 6.

Response:

Please refer to the Company's response to STFC 1-32. Please also refer to the Company's response to STFC 1-26.

Witness: Paul F. McGlynn

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-32:

Identify each and every transmission line that lower priced energy flows on, as described by Mr. Ali at P 6-7.

Response:

The question mischaracterizes Mr. Ali's testimony. The company further states that energy flows across many electric transmission lines in PJM's transmission network based on the power system's impedance matrix, regardless of the price of that power. Project 9A is justified because it alleviates congestion on the AP-South Reactive Interface transmission facilities, as described in the Company's response to STFC 1-30. Please refer to the Company's responses to OCA IV-04, OCA IV-16, and OCA VII-1.

Witness: Paul F. McGlynn and Kamran Ali

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-33:

Identify each and every "congested facility" that the proposals 2014/15 RTEP Long Term Proposal Window addressed, as referenced in Mr. Ali's Statement, p. 7, lines 7-8.

Response:

The Company notes that the information requested, other than the information related to PJM's market efficiency analysis that determined that Project 9A is needed as a market efficiency project in PJM's RTEP, bears no relationship with Project 9A. The Company further notes that the information requested contains Critical Energy Infrastructure Information ("CEII") that is Confidential and Highly Sensitive. Upon further request, the information will be made available for review, subject to and consistent with the protective order in this case and applicable licensing requirements; the Company notes, however, that the information requested is not relevant to the Company's application.

Please refer also to the publicly-available information in the November 2014 TEAC slides, available at the following link: [http://pjm.com/-/media/committees-groups/committees/teac/20141111/20141111-market-efficiency-update.ashx], referring to transmission system congestion constraints in the PJM system for which PJM sought market efficiency project proposals consistent with FERC Order 1000. Please refer to Slide 9 for information specific to the AP South Reactive Interface that Project 9A addresses.

Witness: Paul F. McGlynn and Kamran Ali

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-34:

Please identify any each and every individual from AECOM who worked on the Siting Study in any capacity and describe his or her role in the study.

Response:

Please see the Company's response to STFC 01-1, including STFC 01-1 Attachment 1.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 5/8/2018)

Data Request STFC-01-35:

Identify each and every time that the proposed Route was unable to use parallel alignments along existing utility rights —of—way or other infrastructure, such as roadways and railroads, as discussed by Mr. Baker on P. 9.

Response:

Please refer to the IEC West Siting Study for a discussion of the existing corridors that were analyzed during the siting process.



17 North Second Street 12th Floor Harrisburg, PA 17101-1601 717-731-1970 Main 717-731-1985 Main Fax www.postschell.com

Lindsay A. Berkstresser

lberkstresser@postschell.com 717-612-6021 Direct 717-731-1985 Direct Fax File #: 166570

June 11, 2018

VIA E-MAIL & REGULAR MAIL

Jordan B. Yeager, Esquire Mark L. Freed, Esquire Joanna A. Waldron, Esquire Curtin & Heefner LLP 2005 S. Easton Road, Suite 100 Doylestown, PA 18901

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 Counsel:

Enclosed are the Responses of Transource Pennsylvania, LLC to the Interrogatories of Stop Transource Franklin County – Set I, Nos. 6 - 11 and 18, in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Bulestresser

Sincerely,

Lindsay A. Berkstresser

LAB/jl Enclosures Jordan B. Yeager, Esquire June 11, 2018 Page 2

cc: Certificate of Service

Rosemary Chiavatta, Secretary (Letter & Certificate of Service Only)

CERTIFICATE OF SERVICE Docket Nos. A-2017-2640195 & A-2017-2640200

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

Dianne E. Dusman, Esquire Darryl Lawrence, Esquire Phillip D. Demanchick, Esquire David T. Evrard, Esquire Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923

Sharon E. Webb, Esquire Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, PA 17101

Romulo L. Diaz, Jr., Esquire Jack R. Garfinkle, Esquire Jennedy S. Johnson, Esquire PECO Energy Company 2301 Market Street Philadelphia, PA 19103 PECO

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Stop Transource Franklin County

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Mountain Hunt Club, Inc. &
Citizens to STOP Transource

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Michael Cordell 4219 Altenwald Rd Waynesboro, PA 17268

Roy Cordell Emma Cordell 4690 Fetterhoff Chapel Road Chambersburg, PA 17202

Aaron Kauffman Melinda Kauffman 4220 Old Scotland Rd Chambersburg, PA 17202

Colt Martin Kristyn Martin 8020 Hidden Valley Rd Waynesboro, PA 17268

Leonard Kauffman Mary Kauffman 4297 Olde Scotland Rd Chambersburg, PA 17202 Allen Rice Lori Rice 1430 Henry Lane Chambersburg, PA 17202

Lois White 1406 Walker Road Chambersburg, PA 17202

Willa Weller Kaal 67 Summer Breeze Lane Chambersburg, PA 17202

Allan Stine Heather Stine 867 Cider Press Road Chambersburg, PA 17202

Karen Benedict Rodney Myer 5413 Manheim Rd Waynesboro, PA 17268

Lantz Sourbier Laura Sourbier 64 Edgewood Cir Chambersburg, PA 17202

Ashley Hospelhorn 8010 Hidden Valley Ln Waynesboro, PA 17268

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Danielle Bernecker 1827 Wood Duck Dr E Chambersburg, PA 17202

Courtney & Derek Dettinger 24 Chanceford Rd Brogue Pa 17309 James McGinnis, Jr. 290 Woolen Mill Road New Park, PA 17352

Darwyn Benedict 410 N. Grant Street Waynesboro, PA 17268

Date: June 11, 2018

Lindsay A. Berkstresser

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Data Request STFC-01-06:

For witness Peggy I. Simmons, please identify:

- a. all documents or communications relied on in preparing her witness statement;
- b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement;
- c. list all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

Response:

Please refer to the Company's objection to this discovery request. Without waiving these objections, the Company further states that Ms. Simmons submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission.

- a. Ms. Simmons relied upon her background in Economics and Science Administration with a concentration in Public Policy as detailed on pages 1-4 of her testimony in preparing Statement No. 1. Non-privileged and discoverable documents relied upon by Ms. Simmons include Transource's proposal that was submitted to PJM and other documents provided in discovery in this proceeding.
- b. Lisa Kelso and Laurie Spears participated in the preparation, drafting, and review of the statement.
- c. Ms. Simmons submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission. Ms. Simmons has also submitted similar written testimony in support of Transource Pennsylvania, LLC's (Transource PA) application for the required approval to construct the Pennsylvania portion of the Independence Energy Connection Project, currently pending before the Pennsylvania Public Utility Commission. As stated in Ms. Simmons direct testimony, Ms. Simmons has participated in numerous regulatory proceedings in state jurisdictions on behalf of affiliates of Transource PA and Transource MD. Ms. Simmons has not authored any specific publications related to electric transmission lines.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Witness: Peggy I. Simmons

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Data Request STFC-01-07:

For the witness Kamran Ali, please identify:

- a. all documents or communications relied on in preparing his witness statement;
- b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement;
- c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

Response:

Please refer to the Company's objection to this discovery request. Without waiving these objections, the Company further states that Mr. Ali submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission.

- a. Mr. Ali relied upon his extensive experience as an Electrical Engineer as detailed on pages 1-2 of his testimony in preparing Statement No. 2. Non-privileged and discoverable documents relied upon by Mr. Ali include Transource's proposal that was submitted to PJM and other documents provided in discovery in this proceeding.
- b. Craig Lockwood and Nicolas Koehler participated in the preparation, drafting, and review of the statement.
- c. Mr. Ali submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission. Mr. Ali has also submitted similar written testimony in support of Transource Pennsylvania, LLC's (Transource PA) application for the required approval to construct the Pennsylvania portion of the Independence Energy Connection Project, currently pending before the Pennsylvania Public Utility Commission. Mr. Ali has also filed testimony in regulatory proceedings before the Commissions in Indiana, West Virginia and Kentucky on behalf of affiliates of Transource PA and Transource MD.

Witness: Kamran Ali

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Data Request STFC-01-08:

For the witness Paul F. McGlynn, please identify:

- a. all documents or communications relied on in preparing his witness statement;
- b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement;
- c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

Response:

Please refer to the Company's objection to this discovery request. Without waiving these objections, the Company further states that Mr. McGlynn submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission.

- a. Mr. McGlynn relied upon his extensive experience as an Electrical Engineer as detailed on pages 1-2 of his testimony in preparing Statement No. 3. Non-privileged and discoverable documents relied upon by Mr. McGlynn include Transource's proposal that was submitted to PJM and other documents provided in discovery in this proceeding.
- b. Nicolae Dumitriu and Jim E. Glennon participated in the preparation, drafting, and review of the statement.
- c. Mr. McGlynn submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission. Mr. McGlynn has also submitted similar written testimony in support of Transource Pennsylvania, LLC's (Transource PA) application for the required approval to construct the Pennsylvania portion of the Independence Energy Connection Project, currently pending before the Pennsylvania Public Utility Commission. In addition, Mr. McGlynn has submitted the following testimony before state commissions:

Interrogatories of Stop Transource in Franklin County Set 1

(Responses dated 6/11/2018)

Byron-Wayne 345 kV line

Byron-Wayne-McGlynn-Direct Testimony

Byron-Wayne-McGlynn-Direct Testimony Exhibit 3.01

Byron-Wayne-McGlynn-Direct Testimony Exhibit 3.02

Byron-Wayne-McGlynn-Direct Testimony Exhibit 3.03

Byron-Wayne-McGlynn-Direct Testimony Exhibit 3.04

Byron-Wayne-McGlynn-Direct Testimony Exhibit 3.05

Byron-Wayne-McGlynn-Direct Testimony Exhibit 3.06

Byron-Wayne-McGlynn-Direct Testimony

MAPP in Maryland

MAPP MD-McGlynn Direct Testimony

MAPP MD-McGlynn Supplemental Testimony-11.3.2010

MAPP MD-McGlynn Supplemental Testimony-Exhibit-2010-PFM 1-1 - 11.3.2010

MAPP MD-McGlynn Supplemental Testimony-Exhibit-2010-PFM 1-2 - 11.3.2010

MAPP MD-McGlynn Supplemental Testimony-Exhibit-2010-PFM 1-3 - 11.3.2010

MAPP MD-McGlynn-Supplemental Testimony-7.2009

McCarter Switch Project in NJ

McCarter Switch-McGlynn Testimony and Exhibits

Montville-Whippany 230 kV line in JCPL

Montville-Whippany-McGlynn MW Testimony Final

NETSI (Northeast Transmission System Improvement) Project in BGE

NETSI BGE-McGlynn-Direct Testimony

North Central Reliability Project in PS

West Orange-NCRP-McGlynn Direct Testimony

PATH in West Virginia and Maryland

PATH MD-McGlynn Direct Testimony

PATH MD-McGlynn-Supplemental Direct Revised Testimony-9.14.10-Exhibit PFM-7

PATH MD-McGlynn-Supplemental Direct Testimony-9.14.10

PATH MD-McGlynn-Supplemental Direct Testimony-9.14.10-Exhibit PFM-8

PATH MD-McGlynn-Supplemental Direct Testimony-9.14.10-Exhibit PFM-9

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

PATH MD-McGlynn-Supplemental Direct Testimony-9.14.10-Exhibit PFM-10

PATH MD-McGlynn-Supplemental Direct Testimony-9.14.10-Exhibit PFM-11

PATH WV-McGlynn Direct Testimony

PATH WV-McGlynn-Supplemental Direct Revised Testimony

PATH WV-McGlynn-Supplemental Direct Testimony

Susquehanna Roseland in both Pennsylvania and NJ

SR NJ-McGlynn-Direct Testimony

SR NJ-McGlynn-Exhibit PFM-1-Direct Testimony

SR NJ-McGlynn-Rebuttal

SR PA-McGlynn-Direct-1.26.2009

SR PA-McGlynn-Direct-1.26.2009

SR PA-McGlynn-Rebuttal-8.7.2009

Witness: Paul F. McGlynn

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Data Request STFC-01-09:

For witness Barry A. Baker, please identify:

- a. all documents or communications relied on in preparing his witness statement;
- b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement;
- c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

Response:

Please refer to the Company's objection to this discovery request. Without waiving these objections, the Company states the following:

- a. Mr. Baker relied upon his extensive experience in Environmental Science as detailed on pages 1-3 of his testimony in preparing Statement No. 4. Non-privileged and discoverable documents relied upon by Mr. Baker include Transource's proposal that was submitted to PJM and other documents provided in discovery in this proceeding.
- b. Heather Brewster, Laurie Spears and David Yezuita participated in the preparation, drafting, and review of the statement.
- c. Mr. Baker submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission. Mr. Baker has also submitted similar written testimony in support of Transource Pennsylvania, LLC's (Transource PA) application for the required approval to construct the Pennsylvania portion of the Independence Energy Connection Project, currently pending before the Pennsylvania Public Utility Commission. Mr. Baker has provided siting testimony before the Pennsylvania Public Utility Commission ("Commission" or "PUC") for:
- PPL Electric Utilities Appenzell Project
- Penelec/MAIT Bedford North Central City West Project
- PPL Electric Utilities Blooming Grove Jackson Project
- PPL Electric Utilities Effort Mountain Project
- PPL Electric Utilities Northeast Pocono Project

He has also provided siting testimony before the New Jersey Board of Public Utilities for:

• New Jersey Natural Gas – Southern Reliability Link Project

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

• PSE&G - North Central Reliability Project

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Data Request STFC-01-10:

For witness Kent M. Herzog, please identify:

- a. all documents or communications relied on in preparing his witness statement;
- b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement;
- c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

Response:

Please refer to the Company's objection to this discovery request. Without waiving these objections, the Company further states that Mr. Herzog submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission.

- a. Mr. Herzog relied upon his extensive experience in Electrical Engineering, Business Administration and Project Management as detailed on page 1 of his testimony in preparing Statement No. 5. Non-privileged and discoverable documents relied upon by Mr. Herzog include Transource's proposal that was submitted to PJM and other documents provided in discovery in this proceeding.
- b. Stephen Stein participated in the preparation, drafting, and review of the statement.
- c. Mr. Herzog submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission. Mr. Herzog has also submitted similar written testimony in support of Transource Pennsylvania, LLC's (Transource PA) application for the required approval to construct the Pennsylvania portion of the Independence Energy Connection Project, currently pending before the Pennsylvania Public Utility Commission.

Witness: Kent M. Herzog

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Data Request STFC-01-11:

For the witness Thomas Schaffer, please identify:

- a. all documents or communications relied on in preparing his witness statement;
- b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement;
- c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

Response:

Please refer to the Company's objection to this discovery request. Without waiving these objections, the Company further states that Mr. Schaffer submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission.

- a. Mr. Schaffer relied upon his education and his extensive experience in the right-of-way industry as detailed on pages 1-2 of his testimony in preparing Statement No. 6. Non-privileged and discoverable documents relied upon by Mr. Schaffer include Transource's proposal that was submitted to PJM and other documents provided in discovery in this proceeding.
- b. John Harrison participated in the preparation, drafting, and review of the statement.
- c. Mr. Schaffer submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission. Mr. Schaffer has also submitted similar written testimony in support of Transource Pennsylvania, LLC's (Transource PA) application for the required approval to construct the Pennsylvania portion of the Independence Energy Connection Project, currently pending before the Pennsylvania Public Utility Commission.

Witness: Thomas O. Schaffer

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Data Request STFC-01-18:

With respect to GPE and AEP's history of "siting, designing, constructing and operating transmission grids consisting of approximately 44,000 miles of transmission lines," from Ms. Simmons statement at P. 9, identify the following:

- a. which lines are dual 230kV lines or greater;
- b. where any and all 230kV or greater lines are located;
- c. when those lines were built; and
- d. what amount of the 44,000 miles of transmission lines were built to "alleviate congestion constraints."

Response:

- a. Please refer STFC 01-18 Attachment 1 for a table of AEP transmission lines as of 12/31/17, not including transmission lines owned by joint ventures. GPE subsidiaries Kansas City Power & Light (KCP&L) and KCP&L Greater Missouri Operations ("GMO") own, operate, and maintain approximately 615 miles of 345kV transmission line, of which 165 miles are owned by Transource Missouri.
- b. Please see STFC 01-18 Attachment 1 for the location of the AEP facilities. Of the GPE (or its subsidiaries transmission lines), approximately 450 miles of 345kV transmission is located in western Missouri and eastern Kansas centered near Kansas City, Missouri. The additional 165 miles (owned by Transource Missouri) are located in northwest Missouri.
 - GPE subsidiaries Kansas City Power & Light ("KCP&L") and KCP&L Greater Missouri Operations ("GMO") own, operate, and maintain approximately 450 miles of 345kV transmission in western Missouri and eastern Kansas centered near Kansas City, Missouri.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

KCP&L also operates and maintains two other 345kV transmission lines totaling 165 miles that are owned by Transource Missouri. These two lines – Iatan-Nashua (32 miles) and Sibley Nebraska City (133 miles) – are located in northwest Missouri.

c. The transmission lines reflected in STFC 01-18 Attachment 1 generally were constructed during the 1950s and later, with the 765kV system beginning construction in the 1960s. Most of the transmission lines at voltages 230 kV or greater owned by KCP&L and GMO were built in the 1960s through 1980s timeframe. Most of KCP&L and GMO's transmission line additions since that time have been at voltages lower than 230 kV, with only a few miles of transmission line additions at voltages of 230 kV or greater.

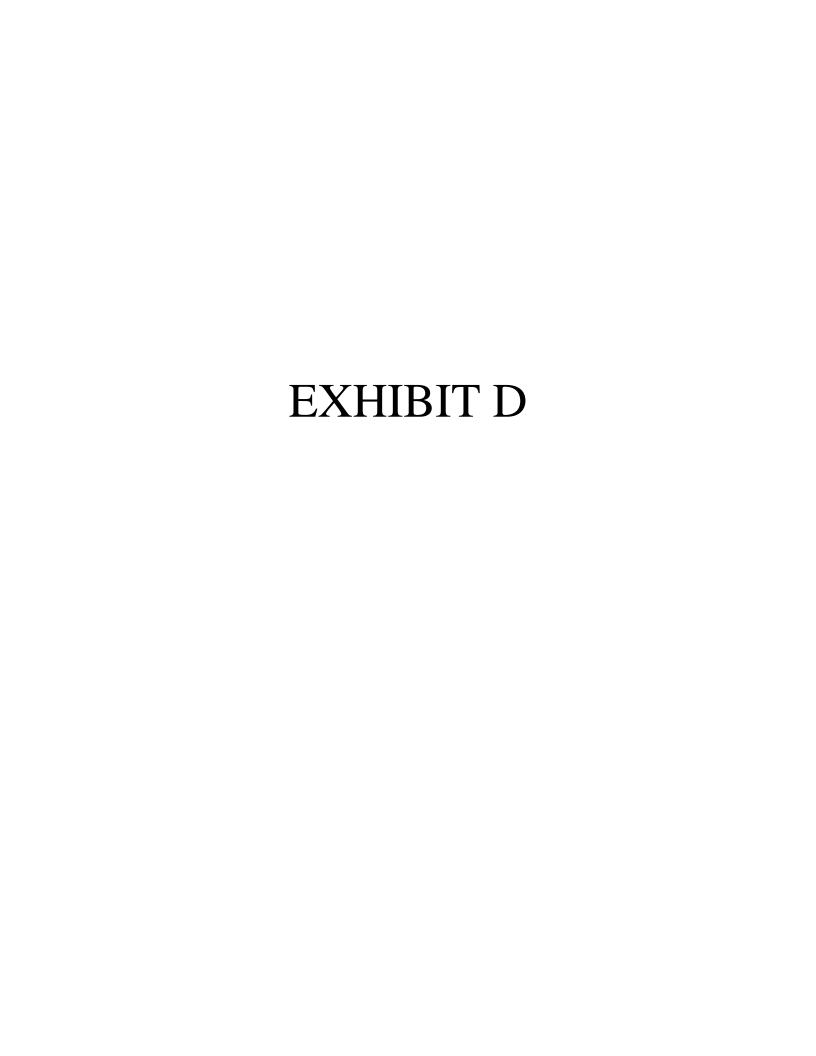
Transource Missouri's Iatan-Nashua line was placed in service in April 2015 and its Sibley-Nebraska City line was placed in service in December 2016.

d. Most of the AEP, KCP&L and GMO transmission lines were built before the advent of Regional Transmission Organizations ("RTO") and were constructed primarily to promote system reliability, exchange of economy energy, and provide generator interconnection for large central station power plants. However, the construction of these facilities, in and of themselves, generally helps reduce congestion on the existing transmission grid.

The Transource Missouri lines were constructed under the planning provisions of the Southwest Power Pool, Inc. ("SPP") Open Access Transmission Tariff as economic projects to mitigate transmission congestion that was impacting market energy prices.

Witness: Peggy I. Simmons

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West Virginia APC	382		311			1,131		1,825	18	342	099		2,844	56		2,901
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KGP IMI	0.0	0.0	0.0	0.0	0.0	43.8	0.0	43.8	0.0	0.0	0.0	0.0	43.8	29.6	0.0	73.4
KPC	257.5	0.0		0.0	47.5	358.1	0.0	671.5	0.0	428.4	166.1	0.0	1,266.0	1.9	0.0	1,267.9
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17 North Second Street 12th Floor Harrisburg, PA 17101-1601 717-731-1970 Main 717-731-1985 Main Fax www.postschell.com

Lindsay A. Berkstresser

lberkstresser@postschell.com 717-612-6021 Direct 717-731-1985 Direct Fax File #: 166570

May 9, 2018

VIA E-MAIL & REGULAR MAIL

Jordan B. Yeager, Esquire Mark L. Freed, Esquire Joanna A. Waldron, Esquire Curtin & Heefner LLP 2005 S. Easton Road, Suite 100 Doylestown, PA 18901

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 Counsel:

Enclosed are the Responses of Transource Pennsylvania, LLC to the Request for Production of Documents of Stop Transource Franklin County – Set I in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Due to the voluminous nature of the attachments, CDs will be provided to counsel for Stop Transource Franklin County and the Office of Consumer Advocate. CDs will be provided to other parties upon request.

Jordan B. Yeager, Esquire

May 9, 2018

Page 2

Sincerely,

Hudsey A. Beckstresser

Lindsay A. Berkstresser

LAB/jl Enclosures

cc: Certificate of Service

Rosemary Chiavatta, Secretary (Letter & Certificate of Service Only)

CERTIFICATE OF SERVICE Docket Nos. A-2017-2640195 & A-2017-2640200

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

Dianne E. Dusman, Esquire Darryl Lawrence, Esquire Phillip D. Demanchick, Esquire David T. Evrard, Esquire Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923

Sharon E. Webb, Esquire Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, PA 17101

Romulo L. Diaz, Jr., Esquire Jack R. Garfinkle, Esquire Jennedy S. Johnson, Esquire PECO Energy Company 2301 Market Street Philadelphia, PA 19103 PECO

Jordan B. Yeager, Esquire
Mark L. Freed, Esquire
Joanna A. Waldron, Esquire
Curtin & Heefner LLP
2005 S. Easton Road, Suite 100
Doylestown, PA 18901
Stop Transource Franklin County

Teresa K. Harrold, Esquire FirstEnergy Service Company 2800 Pottsville, Pike, PO Box 16001 Reading, PA 19612-6001 MAIT Kimberly A. Klock, Esquire Amy E. Hirakis, Esquire PPL Services Corporation Two North Ninth Street Allentown, PA 18101 PPL Electric Utilities Corporation

Karen O. Moury, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
Maple Lawn Farms, Inc., Rose Tree-Blue
Mountain Hunt Club, Inc. &
Citizens to STOP Transource

Thomas J. Sniscak, Esquire Whitney E. Snyder, Esquire 100 North Tenth Street Harrisburg, PA 17101 York County Planning Commission

Linus E. Fenicle, Esquire Reager & Adler, PC 2331 Market Street Camp Hill, PA 17011 Quincy Township

VIA FIRST CLASS MAIL

Byron Jess Boyd 831 New Park Road New Park, PA 17352

Hugh McPherson 2885 New Park Road New Park, PA 17352

J Ross McGinnis, Esquire 41 West Main Street Fawn Grove, PA 17321

Barron Shaw Jana Shaw 445 Salt Lake Rd Fawn Grove, PA 17321

Fred Byers 1863 Coldsmith Rd Shippensburg, PA 17257

Michael Cordell 4219 Altenwald Rd Waynesboro, PA 17268

Roy Cordell Emma Cordell 4690 Fetterhoff Chapel Road Chambersburg, PA 17202

Aaron Kauffman Melinda Kauffman 4220 Old Scotland Rd Chambersburg, PA 17202

Colt Martin Kristyn Martin 8020 Hidden Valley Rd Waynesboro, PA 17268 Leonard Kauffman Mary Kauffman 4297 Olde Scotland Rd Chambersburg, PA 17202

Allen Rice Lori Rice 1430 Henry Lane Chambersburg, PA 17202

Lois White 1406 Walker Road Chambersburg, PA 17202

Willa Weller Kaal 67 Summer Breeze Lane Chambersburg, PA 17202

Allan Stine Heather Stine 867 Cider Press Road Chambersburg, PA 17202

Karen Benedict Rodney Myer 5413 Manheim Rd Waynesboro, PA 17268

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Chambersburg, PA 17202

Ashley Hospelhorn 8010 Hidden Valley Ln Waynesboro, PA 17268

Ashley Hospelhorn 116 West 3rd Street Waynesboro, PA 17268 Danielle Bernecker 1827 Wood Duck Dr E Chambersburg, PA 17202

Courtney & Derek Dettinger 24 Chanceford Rd Brogue Pa 17309 James McGinnis, Jr. 290 Woolen Mill Road New Park, PA 17352

Darwyn Benedict 410 N. Grant Street Waynesboro, PA 17268

Date: May 9, 2018

Lindsay A. Berkstresser

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-01:

All documents that refer or relate in any way to PJM's Market Efficiency Project 9A ("Project 9A.")

Response:

Transource has objected to Question No. 1 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Witness: Counsel

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-02:

All documents that refer to, relate to in any way, or constitute in any way the Siting Study.

Response:

Transource has objected to Question No. 2 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please refer to the references provided in the IEC West Siting Study (Section 6) for a list of citations for the references used during the development of the Siting Study. Also, please see Appendix A to the Siting Study for a list of GIS data sources that were used during the development of the Siting Study. Please see the attachments for additional information. Please see STFC-01-D-02 Attachments 1 through 6 for additional information and all of the Company's responses to STFC-01D.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-03:

All documents that constitute Investigation Materials pertaining to surface water, groundwater, air, and/or soil quality at, around, in close proximity to, or affected by the IECWest Project.

Response:

Transource has objected to Question No. 3 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

The Company is in the process of completing surveys for wetlands and surface waters for the Proposed Route on the IEC West Project. The survey area encompasses a 300-foot-wide corridor along the proposed transmission line route, 100-foot-wide corridor for potential off-right-of-way (ROW) construction access areas, and up to an approximately 1,000-foot buffer around certain structures where pulling or wire-set-up sites may be necessary during construction of the Project. Although not all parcels are currently surveyed, the wetland delineation forms for the surveyed parcels are included as STFC 01D-3 Attachment 1. A formal wetland delineation report for the Proposed Route will be completed once all parcels have been surveyed. In addition, a Wetland Delineation Report was completed for the Rice Substation Site (please see STFC 01D-3 Attachment 2).

The Company has retained a geo-technical consultant to complete soil borings at certain locations along the Proposed Route. The surveys have not been completed; therefore, the results are still preliminary in nature and subject to editing during the final review. The preliminary soil borings logs are included as STFC 01D-03 Attachment 3.

The Company used a variety of GIS data resources during the development of the Siting Study. Appendix A of the Siting Study contains a list of the GIS data collected and the source of the information. Transource does not own this data and cannot distribute it to other parties per the terms of the agreement for downloading the information. However, it is readily available for download at the sources provided, subject to any requirements from those sources.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-04:

All documents that refer or relate to waters of the Commonwealth, as defined in the Clean Streams Law, at, around, in close proximity to the Project Study Area, including location and inventory of such waters.

Response:

Transource has objected to Question No. 4 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding. These are being provided as STFC-01D-04 Attachments 1 through 10.

The Company used publicly available GIS data to identify water resources within the Project Study Area for the purposes of the Siting Study. The source of this data is referenced in Appendix A of the IEC West Siting Study (Attachment 3 to the Siting Application). In addition, Section 4.1 Natural Resources; Water Resources (beginning on pages 36 of the Siting Study) discusses specific streams and/or waterways with special designations per Pennsylvania Code Title 25, Water Quality Standards (Chapter 93). The citations referenced in this section of the Siting Study are included in Section 6: References, with hyperlinks to the corresponding information. Please see the Company's responses to STFC 01D-9, STFC 01D-10, and STFC 01D-12 for additional information related to Transource's agency coordination activities.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-05:

All documents that refer to, relate to, or constitute in any way Investigation Materials pertaining to the Project Study Area.

Response:

Transource has objected to Question No. 5 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the Company's response to STFC 01D-3 for information related to the wetland and surface water delineations.

The Company has also retained Burns and McDonnell to complete archaeological surveys. Cultural resources field surveys are being performed for designated high probability areas (for containing cultural resources) for the potential transmission line alignment in Franklin County, PA where land access is allowed, which includes an approximately 300-foot-wide corridor along the potential transmission line alignment, 100-foot-wide corridors for potential off-right-of-way (ROW) construction access areas, and up to an approximately 1,000-foot buffer area around certain structures where pulling or wire-set-up sites may be necessary during construction of the Project. A historic resources review is also being conducted for areas within a half mile of the preliminary project alignment. The results of these surveys are confidential and are not provided in this response. Please note the language protecting this information is included in the STFC-01D-05 Attachments 1-3 as applicable.

The Company completed several field reviews during the Study Segment phase of the project. Please see the Company's response to STFC 01D-2 for data collected during these field reviews.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-06:

All documents that refer or relate to how the Project 9A and/or the IEC-West Project can or could affect surface water, groundwater, air, and/or soil quality, and/or health of humans, wildlife, and/or aquatic life.

Response:

Please see the Company's response to STFC 01D-3 above. In addition, the IEC West Siting Study, Section 4: Alternative Route Comparison, discusses the potential impacts to the natural and human environment, specifically soil and water resources, wildlife habitat and sensitive species, agricultural and forestry resources, recreation and conservation lands, developed land use, historic and archeological resources, and scenic resources. The referenced information in these sections is provided in Section 6 (References) and Appendix A (GIS Data Sources). Please see the Company's response to STFC 01D-2, specifically Attachments 5 and 6 for a comparative table of factors considered during the siting process.

A factsheet on Stray Voltage is provided on the Company's website (listed above) and is included as STFC 01D-6 Attachment 1.

The public version of the Project 9A proposal is available at: [http://www.pjm.com/-/media/planning/rtep-dev/expan-plan-process/ferc-order-1000/rtep-proposal-windows/redacted-public-proposals/201415-1-9a-dominion-high-voltage-transource-public-redacted-version-southern-pa.ashx?la=en].

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-07:

All documents that refer or relate to groundwater in the Project Study Area, including but not limited to flow and infiltration paths and patterns, the water table, the aquifer system(s), and soil and/or geologic characteristics.

Response:

Please see the Company's response to STFC 01D-3.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-08:

All documents that refer to or relate to any agricultural soils, and any soils identification or sampling collected for, or related to, the Project Study Area or Project 9A.

Response:

The IEC West Siting Study discusses soils and agricultural soils in Section 4.1 Natural Resources, beginning on page 32. The references cited in this section of the Siting Study can be found in Section 6 of the Siting Study. Figure 7b of the Siting Study illustrates the prime farmland based on the Natural Resource Conservation Service GIS data obtained from the USDA- NRCS SSURGO Database (2015).

Please see the Company's response to STFC 01D-3 and the associated attachments for soil samples related to wetland delineations that have been completed to date. Please see the Company's response to STFC 01D-3 and associated attachments for the preliminary soil boring logs completed to date.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-09:

All documents that refer to or constitute in any way communications between you and the Pennsylvania Department of Environmental Protection about permits, applications, and/or review related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 9 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the STFC-01D-09 Attachments 1 through 11 in response to this request. Some of the documents were originally marked confidential because they were confidential at the time they were used. The original marking has not been removed; however, those documents are no longer considered confidential. Please note that the production headers do not indicate a confidential designation.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-10:

All documents that refer to or constitute in any way communications between you and the U.S. Army Corps of Engineers, about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 10 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see STFC-01D-10 Attachments 1 through 7 in response to this request.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-11:

All documents that refer to or constitute in any way communications between you and the U.S. Fish and Wildlife Service about permits, applications, or reviews related to the IECWest Project or the Siting Study.

Response:

Transource has objected to Question No. 11 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the STFC-01D-11 Attachments 1 through 6 in response to this request.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-12:

All documents that refer to or constitute in any way communications between you and the Pennsylvania Fish and Boat Commission, about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 12 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the STFC-01D-12 Attachments 1 through 8 in response to this request.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-13:

All documents that refer to or constitute in any way communications between you and the Pennsylvania Game Commission about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 13 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see STFC-01D-13 Attachment 1 in response to this request.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-14:

All documents that refer to or constitute in any way communications between you and the Pennsylvania Department of Conservation and Natural Resources about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 14 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see STFC-01D-14 Attachments 1 through 6 in response to this request. The list of attendees for the July meeting included the following individuals:

Edward Muzic
Nathan Crawford
Scott Williamson
Bob Conrad
Nathan Phillips
John Chripzuk
Barry Baker
Laurie Spears (participated by phone)
Rob Everard (participated by phone)

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-15:

All documents that refer to or constitute in any way communications between you and the Pennsylvania Historical and Museum Commission about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 15 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see STFC-01D-15 Attachments 1 through 15 in response to this request. Maps with the locations of sensitive archaeological resources has been redacted due to the sensitive nature of this information. Please refer also to the Company's response to STFC-01D -05.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-16:

All documents that refer to or constitute in any way communications between you and the Pennsylvania Department of Agriculture about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 16 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see STFC-01D-16 Attachments 1 through 5 in response to this request.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-17:

All documents that refer to or constitute in any way communications between you and the Franklin County Conservation District about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 17 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the Company's response to STFC-01D-9 for responsive documents. The Company notes that the November 21, 2017 meeting reflected in those documents included representatives from the Franklin County Conservation District.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-18:

All documents that refer to or constitute in any way communications between you and any other state, federal, or local agency about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 18 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please refer to the Company's Siting Application and all previous requests under STFC 01D. These documents reflect the communications between the Company and the Commonwealth of Pennsylvania, and federal or local agencies for the IEC West Project.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-19:

All documents relating to the April 10, 2017 meeting at the office of the Pennsylvania Department of Agriculture involving Laurie Spears, Doug Wolfgang, Barry Baker and Dave Yenzuita.

Response:

Transource has objected to Question No. 19 as requesting privileged information. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please refer to the Company's response to STFC 01D-16 in particular STFC 01D-16 Attachments 4 and 5 which include the maps discussed with Doug Wolfgang as it pertains to the IEC West Project.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-20:

All documents relating to the March 8, 2017 meeting at the office of Franklin County Planning Commission involving Laurie Spears, Barry Baker, Dave Yezuita, Phil Tarquino, Rochelle Barvincheck and Elizabeth Grant.

Response:

Transource has objected to Question No. 20 as requesting privileged information. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

A meeting summary was prepared by AECOM for the March 8, 2017 meeting and is included with this response as STFC-01D-20 Attachment 1. This summary was not reviewed by Franklin County and only served as internal notes for AECOM and the Company.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-21:

All documents relating the September 20, 2017 meeting at Pennsylvania Department of Conservation and Natural Resources Bureau of Forestry, with Laurie Speers, Barry Baker, Heather Spears, Chris Plank, Dave Mong, Roy Brubaker and Rebecca Bowen.

Response:

Transource has objected to Question No. 21 as requesting privileged information. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the Company's response to STFC 01D-14, specifically Attachments 2 and 3.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-22:

The Human Use and Ecologic Impacts study that was performed for the Susquehanna-Roseland powerline, and was emailed to Heather Brewster on September 21, 2017 by Christopher Plank.

Response:

Transource has objected to Question No. 22 as irrelevant to the pending Siting Application. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see STFC 01D-22 Attachments 1 and 3 for information related to the referenced Human Use and Ecologic Impacts Study. STFC 01D-22 Attachment 2 was also included in the same email from Christopher Plank and contains the Pennsylvania Supreme Court Decision referenced in the meeting summary included in STFC 01D-14.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-23:

The Map emailed to Heather Brewster by Hathaway Jones of the USDA/NRCS on August 31, 2017 ``showing easements in the proximity/close to the proposed pipeline."

Response:

Transource has objected to Question No. 23 as irrelevant to the pending Siting Application. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see STFC 01D-23 Attachment 1 in response to this request.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-24:

All attachments referenced in the November 8, 20171etter of Heather Brewster to Hathaway Jones, of the USDA/NRCS regarding Natural Resources Conservation Service Agricultural Easements, including the Proposed Route Aerial Maps, Shapefile of Proposed Routes w/Parcel Data, List of Notified Landowners with Parcel Data, and Agricultural Easement Deeds.

Response:

Transource has objected to Question No. 24 as irrelevant to the pending Siting Application. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see STFC-01D-24 Attachments 1 through 4. Please note that certain information has been redacted from the shapefiles to protect landowner privacy.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-25:

All documents that refer or relate to the water wells on properties within the proposed right-of-way.

Response:

Transource has objected to Question No. 25 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

To the Company's knowledge, there are no water wells within the proposed right-of-way. The Company notes that not all landowners have provided Transource access to their property at this time.

Witness: Thomas O. Schaffer

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-26:

All documents that refer or relate to the location of all water wells that are hydrologically connected to the proposed right-of-way.

Response:

Transource has objected to Question No. 26 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the Company's response to STFC 01D-25.

Witness: Thomas O. Schaffer

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-27:

All documents that refer to, relate to, or constitute in any way facts, investigation, reviews, inquiries, communications regarding the Application, including Project 9A, or the Siting Study.

Response:

Transource has objected to Question No. 27 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the Company's response to this request for production as well as the siting application and all other discovery. Please also refer to the Company's responses to STFC-01D-1 and STFC-01D-2.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-28:

All tangible evidence constituting, relating to, or referring to the facts and/or circumstances described in the Siting Application or Witness Statements.

Response:

Transource has objected to Question No. 28 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the Company's responses to Stop Transource Requests for Production of Documents and Interrogatories.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-29:

All documents you intend to present at any hearing in this matter.

Response:

All documents intended to be presented at the hearing in this matter have not yet been determined. The Company will comply with the litigation schedule and procedures adopted in this proceeding.

Production of Documents for Stop Transource in Franklin County Set 1 (Responses dated 5/9/2018)

Data Request STFC-01D-30:

All reports and witness statements of any experts or witnesses you intend to have testify at any hearing in this matter.

Response:

The reports and witness statements of any experts or witnesses the Company intends to have testify at the hearing in this matter have not yet been determined. The Company will comply with the litigation schedule and procedures adopted in this proceeding.





17 North Second Street 12th Floor Harrisburg, PA 17101-1601 717-731-1970 Main 717-731-1985 Main Fax www.postschell.com

Lindsay A. Berkstresser

lberkstresser@postschell.com 717-612-6021 Direct 717-731-1985 Direct Fax File #: 166570

June 11, 2018

VIA E-MAIL & REGULAR MAIL

Jordan B. Yeager, Esquire Mark L. Freed, Esquire Joanna A. Waldron, Esquire Curtin & Heefner LLP 2005 S. Easton Road, Suite 100 Doylestown, PA 18901

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 Counsel:

Enclosed are the Responses of Transource Pennsylvania, LLC to the Interrogatories of Stop Transource Franklin County - Set I, Nos. 6-11 and 18, in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Bulsstesser

Sincerely,

Lindsay A. Berkstresser

LAB/jl Enclosures Jordan B. Yeager, Esquire June 11, 2018 Page 2

cc: Certificate of Service

Rosemary Chiavatta, Secretary (Letter & Certificate of Service Only)

CERTIFICATE OF SERVICE Docket Nos. A-2017-2640195 & A-2017-2640200

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

Dianne E. Dusman, Esquire Darryl Lawrence, Esquire Phillip D. Demanchick, Esquire David T. Evrard, Esquire Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923

Sharon E. Webb, Esquire Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, PA 17101

Romulo L. Diaz, Jr., Esquire Jack R. Garfinkle, Esquire Jennedy S. Johnson, Esquire PECO Energy Company 2301 Market Street Philadelphia, PA 19103 PECO

Jordan B. Yeager, Esquire Mark L. Freed, Esquire Joanna A. Waldron, Esquire Curtin & Heefner LLP 2005 S. Easton Road, Suite 100 Doylestown, PA 18901 Stop Transource Franklin County

Teresa K. Harrold, Esquire FirstEnergy Service Company 2800 Pottsville, Pike, PO Box 16001 Reading, PA 19612-6001 MAIT Kimberly A. Klock, Esquire Amy E. Hirakis, Esquire PPL Services Corporation Two North Ninth Street Allentown, PA 18101 PPL Electric Utilities Corporation

Karen O. Moury, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
Maple Lawn Farms, Inc., Rose Tree-Blue
Mountain Hunt Club, Inc. &
Citizens to STOP Transource

Thomas J. Sniscak, Esquire Whitney E. Snyder, Esquire 100 North Tenth Street Harrisburg, PA 17101 York County Planning Commission

Linus E. Fenicle, Esquire Reager & Adler, PC 2331 Market Street Camp Hill, PA 17011 Quincy Township

Barron Shaw Jana Shaw 445 Salt Lake Rd Fawn Grove, PA 17321

VIA FIRST CLASS MAIL

Byron Jess Boyd 831 New Park Road New Park, PA 17352

Hugh McPherson 2885 New Park Road New Park, PA 17352

J Ross McGinnis, Esquire 41 West Main Street Fawn Grove, PA 17321

Fred Byers 1863 Coldsmith Rd Shippensburg, PA 17257

Michael Cordell 4219 Altenwald Rd Waynesboro, PA 17268

Roy Cordell Emma Cordell 4690 Fetterhoff Chapel Road Chambersburg, PA 17202

Aaron Kauffman Melinda Kauffman 4220 Old Scotland Rd Chambersburg, PA 17202

Colt Martin Kristyn Martin 8020 Hidden Valley Rd Waynesboro, PA 17268

Leonard Kauffman Mary Kauffman 4297 Olde Scotland Rd Chambersburg, PA 17202 Allen Rice Lori Rice 1430 Henry Lane Chambersburg, PA 17202

Lois White 1406 Walker Road Chambersburg, PA 17202

Willa Weller Kaal 67 Summer Breeze Lane Chambersburg, PA 17202

Allan Stine Heather Stine 867 Cider Press Road Chambersburg, PA 17202

Karen Benedict Rodney Myer 5413 Manheim Rd Waynesboro, PA 17268

Lantz Sourbier Laura Sourbier 64 Edgewood Cir Chambersburg, PA 17202

Ashley Hospelhorn 8010 Hidden Valley Ln Waynesboro, PA 17268

Ashley Hospelhorn 116 West 3rd Street Waynesboro, PA 17268

Danielle Bernecker 1827 Wood Duck Dr E Chambersburg, PA 17202

Courtney & Derek Dettinger 24 Chanceford Rd Brogue Pa 17309 James McGinnis, Jr. 290 Woolen Mill Road New Park, PA 17352

Darwyn Benedict 410 N. Grant Street Waynesboro, PA 17268

Date: June 11, 2018

Lindsay A. Berkstresser

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Data Request STFC-01-06:

For witness Peggy I. Simmons, please identify:

- a. all documents or communications relied on in preparing her witness statement;
- b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement;
- c. list all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

Response:

Please refer to the Company's objection to this discovery request. Without waiving these objections, the Company further states that Ms. Simmons submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission.

- a. Ms. Simmons relied upon her background in Economics and Science Administration with a concentration in Public Policy as detailed on pages 1-4 of her testimony in preparing Statement No. 1. Non-privileged and discoverable documents relied upon by Ms. Simmons include Transource's proposal that was submitted to PJM and other documents provided in discovery in this proceeding.
- b. Lisa Kelso and Laurie Spears participated in the preparation, drafting, and review of the statement.
- c. Ms. Simmons submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission. Ms. Simmons has also submitted similar written testimony in support of Transource Pennsylvania, LLC's (Transource PA) application for the required approval to construct the Pennsylvania portion of the Independence Energy Connection Project, currently pending before the Pennsylvania Public Utility Commission. As stated in Ms. Simmons direct testimony, Ms. Simmons has participated in numerous regulatory proceedings in state jurisdictions on behalf of affiliates of Transource PA and Transource MD. Ms. Simmons has not authored any specific publications related to electric transmission lines.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Witness: Peggy I. Simmons

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Data Request STFC-01-07:

For the witness Kamran Ali, please identify:

- a. all documents or communications relied on in preparing his witness statement;
- b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement;
- c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

Response:

Please refer to the Company's objection to this discovery request. Without waiving these objections, the Company further states that Mr. Ali submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission.

- a. Mr. Ali relied upon his extensive experience as an Electrical Engineer as detailed on pages 1-2 of his testimony in preparing Statement No. 2. Non-privileged and discoverable documents relied upon by Mr. Ali include Transource's proposal that was submitted to PJM and other documents provided in discovery in this proceeding.
- b. Craig Lockwood and Nicolas Koehler participated in the preparation, drafting, and review of the statement.
- c. Mr. Ali submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission. Mr. Ali has also submitted similar written testimony in support of Transource Pennsylvania, LLC's (Transource PA) application for the required approval to construct the Pennsylvania portion of the Independence Energy Connection Project, currently pending before the Pennsylvania Public Utility Commission. Mr. Ali has also filed testimony in regulatory proceedings before the Commissions in Indiana, West Virginia and Kentucky on behalf of affiliates of Transource PA and Transource MD.

Witness: Kamran Ali

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Data Request STFC-01-08:

For the witness Paul F. McGlynn, please identify:

- a. all documents or communications relied on in preparing his witness statement;
- b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement;
- c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

Response:

Please refer to the Company's objection to this discovery request. Without waiving these objections, the Company further states that Mr. McGlynn submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission.

- a. Mr. McGlynn relied upon his extensive experience as an Electrical Engineer as detailed on pages 1-2 of his testimony in preparing Statement No. 3. Non-privileged and discoverable documents relied upon by Mr. McGlynn include Transource's proposal that was submitted to PJM and other documents provided in discovery in this proceeding.
- b. Nicolae Dumitriu and Jim E. Glennon participated in the preparation, drafting, and review of the statement.
- c. Mr. McGlynn submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission. Mr. McGlynn has also submitted similar written testimony in support of Transource Pennsylvania, LLC's (Transource PA) application for the required approval to construct the Pennsylvania portion of the Independence Energy Connection Project, currently pending before the Pennsylvania Public Utility Commission. In addition, Mr. McGlynn has submitted the following testimony before state commissions:

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Byron-Wayne 345 kV line

Byron-Wayne-McGlynn-Direct Testimony

Byron-Wayne-McGlynn-Direct Testimony Exhibit 3.01

Byron-Wayne-McGlynn-Direct Testimony Exhibit 3.02

Byron-Wayne-McGlynn-Direct Testimony Exhibit 3.03

Byron-Wayne-McGlynn-Direct Testimony Exhibit 3.04

Byron-Wayne-McGlynn-Direct Testimony Exhibit 3.05

Byron-Wayne-McGlynn-Direct Testimony Exhibit 3.06

Byron-Wayne-McGlynn-Direct Testimony

MAPP in Maryland

MAPP MD-McGlynn Direct Testimony

MAPP MD-McGlynn Supplemental Testimony-11.3.2010

MAPP MD-McGlynn Supplemental Testimony-Exhibit-2010-PFM 1-1 - 11.3.2010

MAPP MD-McGlynn Supplemental Testimony-Exhibit-2010-PFM 1-2 - 11.3.2010

MAPP MD-McGlynn Supplemental Testimony-Exhibit-2010-PFM 1-3 - 11.3.2010

MAPP MD-McGlynn-Supplemental Testimony-7.2009

McCarter Switch Project in NJ

McCarter Switch-McGlynn Testimony and Exhibits

Montville-Whippany 230 kV line in JCPL

Montville-Whippany-McGlynn MW Testimony Final

NETSI (Northeast Transmission System Improvement) Project in BGE

NETSI BGE-McGlynn-Direct Testimony

North Central Reliability Project in PS

West Orange-NCRP-McGlynn Direct Testimony

PATH in West Virginia and Maryland

PATH MD-McGlynn Direct Testimony

PATH MD-McGlynn-Supplemental Direct Revised Testimony-9.14.10-Exhibit PFM-7

PATH MD-McGlynn-Supplemental Direct Testimony-9.14.10

PATH MD-McGlynn-Supplemental Direct Testimony-9.14.10-Exhibit PFM-8

PATH MD-McGlynn-Supplemental Direct Testimony-9.14.10-Exhibit PFM-9

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

PATH MD-McGlynn-Supplemental Direct Testimony-9.14.10-Exhibit PFM-10

PATH MD-McGlynn-Supplemental Direct Testimony-9.14.10-Exhibit PFM-11

PATH WV-McGlynn Direct Testimony

PATH WV-McGlynn-Supplemental Direct Revised Testimony

PATH WV-McGlynn-Supplemental Direct Testimony

Susquehanna Roseland in both Pennsylvania and NJ

SR NJ-McGlynn-Direct Testimony

SR NJ-McGlynn-Exhibit PFM-1-Direct Testimony

SR NJ-McGlynn-Rebuttal

SR PA-McGlynn-Direct-1.26.2009

SR PA-McGlynn-Direct-1.26.2009

SR PA-McGlynn-Rebuttal-8.7.2009

Witness: Paul F. McGlynn

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Data Request STFC-01-09:

For witness Barry A. Baker, please identify:

- a. all documents or communications relied on in preparing his witness statement;
- b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement;
- c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

Response:

Please refer to the Company's objection to this discovery request. Without waiving these objections, the Company states the following:

- a. Mr. Baker relied upon his extensive experience in Environmental Science as detailed on pages 1-3 of his testimony in preparing Statement No. 4. Non-privileged and discoverable documents relied upon by Mr. Baker include Transource's proposal that was submitted to PJM and other documents provided in discovery in this proceeding.
- b. Heather Brewster, Laurie Spears and David Yezuita participated in the preparation, drafting, and review of the statement.
- c. Mr. Baker submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission. Mr. Baker has also submitted similar written testimony in support of Transource Pennsylvania, LLC's (Transource PA) application for the required approval to construct the Pennsylvania portion of the Independence Energy Connection Project, currently pending before the Pennsylvania Public Utility Commission. Mr. Baker has provided siting testimony before the Pennsylvania Public Utility Commission ("Commission" or "PUC") for:
- PPL Electric Utilities Appenzell Project
- Penelec/MAIT Bedford North Central City West Project
- PPL Electric Utilities Blooming Grove Jackson Project
- PPL Electric Utilities Effort Mountain Project
- PPL Electric Utilities Northeast Pocono Project

He has also provided siting testimony before the New Jersey Board of Public Utilities for:

• New Jersey Natural Gas – Southern Reliability Link Project

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

• PSE&G - North Central Reliability Project

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Data Request STFC-01-10:

For witness Kent M. Herzog, please identify:

- a. all documents or communications relied on in preparing his witness statement;
- b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement;
- c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

Response:

Please refer to the Company's objection to this discovery request. Without waiving these objections, the Company further states that Mr. Herzog submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission.

- a. Mr. Herzog relied upon his extensive experience in Electrical Engineering, Business Administration and Project Management as detailed on page 1 of his testimony in preparing Statement No. 5. Non-privileged and discoverable documents relied upon by Mr. Herzog include Transource's proposal that was submitted to PJM and other documents provided in discovery in this proceeding.
- b. Stephen Stein participated in the preparation, drafting, and review of the statement.
- c. Mr. Herzog submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission. Mr. Herzog has also submitted similar written testimony in support of Transource Pennsylvania, LLC's (Transource PA) application for the required approval to construct the Pennsylvania portion of the Independence Energy Connection Project, currently pending before the Pennsylvania Public Utility Commission.

Witness: Kent M. Herzog

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Data Request STFC-01-11:

For the witness Thomas Schaffer, please identify:

- a. all documents or communications relied on in preparing his witness statement;
- b. all persons other than counsel of record for Transource, who directly or indirectly participated in the preparation, drafting, review or approval of the statement;
- c. all texts, article, reports, theses, other publications, and any other witness statement offered in any state public utility commission matter or which related to the electric transmission lines.

Response:

Please refer to the Company's objection to this discovery request. Without waiving these objections, the Company further states that Mr. Schaffer submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission.

- a. Mr. Schaffer relied upon his education and his extensive experience in the right-of-way industry as detailed on pages 1-2 of his testimony in preparing Statement No. 6. Non-privileged and discoverable documents relied upon by Mr. Schaffer include Transource's proposal that was submitted to PJM and other documents provided in discovery in this proceeding.
- b. John Harrison participated in the preparation, drafting, and review of the statement.
- c. Mr. Schaffer submitted written testimony in support of Transource Maryland, LLC's (Transource MD) application for the required approval to construct the Maryland portion of the Independence Energy Connection Project, currently pending before the Maryland Public Service Commission. Mr. Schaffer has also submitted similar written testimony in support of Transource Pennsylvania, LLC's (Transource PA) application for the required approval to construct the Pennsylvania portion of the Independence Energy Connection Project, currently pending before the Pennsylvania Public Utility Commission.

Witness: Thomas O. Schaffer

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

Data Request STFC-01-18:

With respect to GPE and AEP's history of "siting, designing, constructing and operating transmission grids consisting of approximately 44,000 miles of transmission lines," from Ms. Simmons statement at P. 9, identify the following:

- a. which lines are dual 230kV lines or greater;
- b. where any and all 230kV or greater lines are located;
- c. when those lines were built; and
- d. what amount of the 44,000 miles of transmission lines were built to "alleviate congestion constraints."

Response:

- a. Please refer STFC 01-18 Attachment 1 for a table of AEP transmission lines as of 12/31/17, not including transmission lines owned by joint ventures. GPE subsidiaries Kansas City Power & Light (KCP&L) and KCP&L Greater Missouri Operations ("GMO") own, operate, and maintain approximately 615 miles of 345kV transmission line, of which 165 miles are owned by Transource Missouri.
- b. Please see STFC 01-18 Attachment 1 for the location of the AEP facilities. Of the GPE (or its subsidiaries transmission lines), approximately 450 miles of 345kV transmission is located in western Missouri and eastern Kansas centered near Kansas City, Missouri. The additional 165 miles (owned by Transource Missouri) are located in northwest Missouri.
 - GPE subsidiaries Kansas City Power & Light ("KCP&L") and KCP&L Greater Missouri Operations ("GMO") own, operate, and maintain approximately 450 miles of 345kV transmission in western Missouri and eastern Kansas centered near Kansas City, Missouri.

Interrogatories of Stop Transource in Franklin County Set 1 (Responses dated 6/11/2018)

KCP&L also operates and maintains two other 345kV transmission lines totaling 165 miles that are owned by Transource Missouri. These two lines – Iatan-Nashua (32 miles) and Sibley Nebraska City (133 miles) – are located in northwest Missouri.

c. The transmission lines reflected in STFC 01-18 Attachment 1 generally were constructed during the 1950s and later, with the 765kV system beginning construction in the 1960s. Most of the transmission lines at voltages 230 kV or greater owned by KCP&L and GMO were built in the 1960s through 1980s timeframe. Most of KCP&L and GMO's transmission line additions since that time have been at voltages lower than 230 kV, with only a few miles of transmission line additions at voltages of 230 kV or greater.

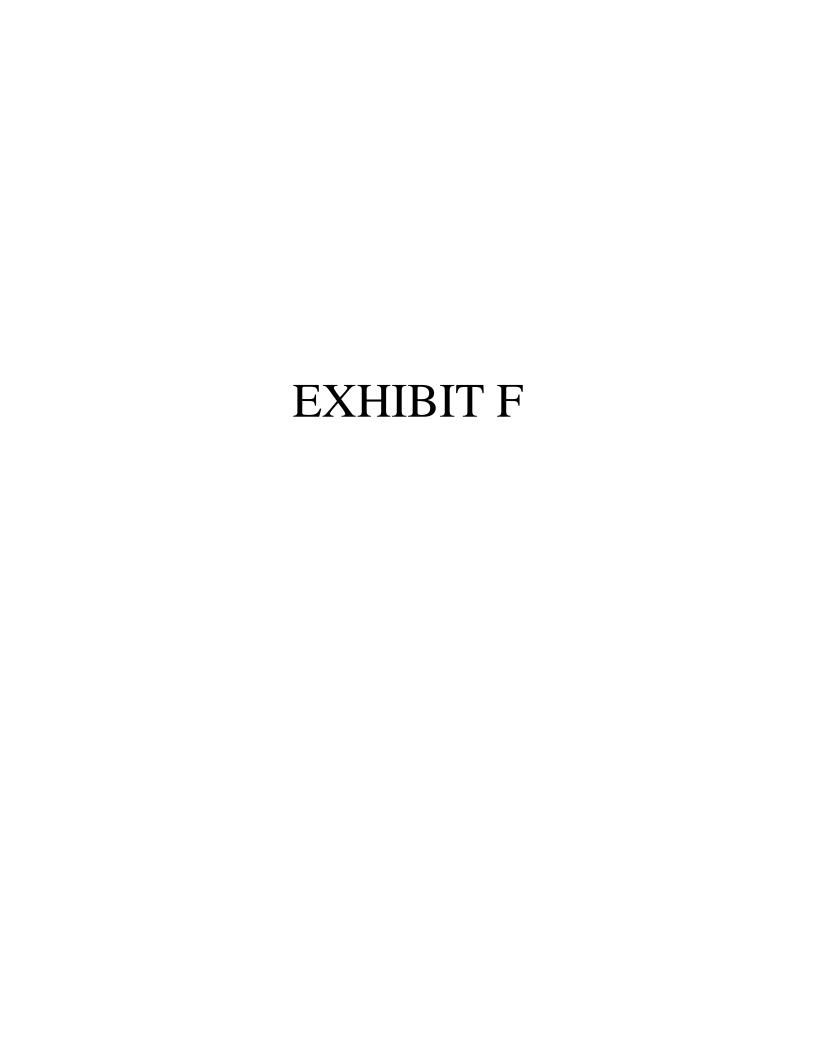
Transource Missouri's Iatan-Nashua line was placed in service in April 2015 and its Sibley-Nebraska City line was placed in service in December 2016.

d. Most of the AEP, KCP&L and GMO transmission lines were built before the advent of Regional Transmission Organizations ("RTO") and were constructed primarily to promote system reliability, exchange of economy energy, and provide generator interconnection for large central station power plants. However, the construction of these facilities, in and of themselves, generally helps reduce congestion on the existing transmission grid.

The Transource Missouri lines were constructed under the planning provisions of the Southwest Power Pool, Inc. ("SPP") Open Access Transmission Tariff as economic projects to mitigate transmission congestion that was impacting market energy prices.

Witness: Peggy I. Simmons

Arkamass	State/Voltage	765	500	345	230	161	138	115	SubTotal	88	69	46	40	SubTotal	34.5	23	Total
Inclaine IAM	Arkansas	200		78	0	305	248					THE REAL PROPERTY.			- 110	20	1,069
Transco - Indiana	Indiana I&M	595		1,378			1,401								461.84		4,254
Indiana	Transco - Indiana	14.61		40.96													168
Kentucky	Indiana	610	0	1,419	0	0	1,466	0		0			0			0	4,422
Louisiana	Kentucky	257		8	STATE OF	48	358			P. STATE OF							1,268
Michigan 16			0	106	0	0	286	1	392	10000000			1000				719
Transco - Michigan 16 0 234 0 0 217 0 487 299 766 115 8 Ohio DPC 506.71 1,455.05 3,193.50 5,155 2,163.47 52.99 7,392 399.97 49.24 77.8 Ohio Total 508 0 1,475 0 0 3,440 0 5,423 0 2,446 0 577 7,926 413 68 88.0 Ohio Total 508 0 1,475 0 0 3,440 0 5,423 0 2,446 0 577 7,926 413 68 88.0 Ohio Total 508 0 5 1,475 0 0 3,440 0 5,423 0 2,446 0 577 7,926 413 68 88.0 Ohio Total 508 0 5 1 34 8 1,894 10 2,537 635 5 3,178 1 63 3,178 1 6	Michigan - I&M	16	100	234			214								115 33		834
Michigan 16 0 234 0 0 217 0 467 299 766 115 8 8											- Allert Control Control			- Contract Contract			47
Ohio OPC		16	0	234	0	0		0									881
Transco - OH 1.39 19.53 246.35 267 262.62 4.14 534 22.01 18.64 50 50 50 50 50 50 50 5	Ohio OPC	506.71											52.93			49.24	7.832
Ohio Total 508																	575
Oklahoma PSO Sept			0		0	0		0		0							8,407
Transco-OK (Alshoma SEP 5.9 3.8 97 197 304 5.00 5.0	Oklahoma PSO				34							Ü	- 01		710	- 00	3,173
Oklahoma SEP Oklahoma Total Oklahoma																	500
Oklahoma Total Oklahoma Total				59													97
Tennessee RPC Tennessee Total	Oklahoma Total	0	0		34	8		10		0	939	0	0		0	0	3,770
Tennessee KGP	Tennessee APC				91												204
Tennessee Total Tennessee Total Texas PSO	Tennessee KGP							1									73
Texas SEP	Tennessee Total	0	0	0	91	0		0		0	2	0	0			0	277
Texas SEP				17			7,175.07				-				- 00	- 0	29
AEP Texas								15			821						2,218
Texas Total 0 0 1,365 0 0 4,820 15 6,200 0 4,468 0 0 10,668 0 0 10,668 0 0 10,668 0 0 10,668 0 0 10,668 0 0 10,668 2,98 2,18 4 0,68 4 0 4 0 4 0 0 0 0 0 0 1,191 1 14 1 14 14 0 0 1,291 1 1,191 1,181 1,181 1,181 1,181 1,181 1,181 1,181 1,181 1,181 1,181 1,181 1,181 1,181 1,181 1,181 1,	AEP Texas		-					- 19									8,421
Virginia 349 96 69 15 1,615 2,145 632 48 2,826 98 2,9 Transco - W 1 141 142 2 10 155 1 1 1 West Virginia OPC 0.45 41,80 42 2.13 44 0.88 West Virginia APC 382 311 1,131 1,825 18 342 660 2,844 56 2.9 West Virginia APC 382 311 1,131 1,825 18 342 660 2,844 56 2.9 W. Virginia WPC 15,68 15,67 1,94.61 226 84.80 311 33 34 70 0 3,354 58 0 3,4 70 0 3,354 58 0 3,4 81 10,845 885 57 36,553 1,195 68 37,8 APC 731.8 95.7 380.9 106.6 0.0 2,856.1 0.0	Texas Total	0	0		0	0		15		0		0	0		0	0	10,668
Transco - WV	Virginia	349	96		15			10.00								0	2,924
West Virginia OPC 0.45 41.80 42 2.13 44 0.68 West Virginia APC 382 311 1,131 1,825 18 342 660 2,844 56 2,9 West Virginia INPC 15.68 15.67 194.61 226 84.80 311 331 331 331 331 331 331 331 331 333 334 343 343 344 360 331 332 344 360 331 334 343 344 360 344 343 340 344 345 344 344 344 344 344 344 344 344 344 344 344 344 344 344 344 344 344 345 344 344 345 344 344 345 344 344 345 344 344 344 344 344 344 344 344 344 344 344 344	Transco - WV								100000000000000000000000000000000000000						- Contract		155
West Virginia APC 382 311 1,131 1,825 18 342 660 2,844 56 2,9 West Virginia WPC 15.68 15.67 194.61 226 84.80 311 311 33	West Virginia OPC			0.45										11777			45
West Virginia WPC 15.68 15.67 194.61 226 84.80 311 331 33 W. Virginia Total 382 16 329 0 0 1,509 0 2,235 18 431 670 0 3,354 58 0 3,4 Voltage Totals 2,123 111 5,733 140 360 16,241 39 24,748 18 10,845 885 57 36,553 1,195 68 37,8 APC 731.8 95.7 380.9 106.6 0.0 2,856.1 0.0 4,171.0 17.5 976.3 708.5 0.0 5,873.4 154.6 0.0 6,02 IMP 611.3 0.0 1,611.5 0.0 0.0 1,614.9 0.0 3,837.7 0.0 672.5 0.0 0.0 4,510.2 577.2 0.0 5,087 KGP 0.0 0.0 0.0 0.0 0.0 43.8 0.0 0.0 0.0	West Virginia APC	382		311			1.131			18		660					2,901
W. Virginia Total 382 16 329 0 0 1,509 0 2,235 18 431 670 0 3,354 58 0 3,4 Voltage Totals 2,123 111 5,733 140 360 16,241 39 24,748 18 10,845 885 57 36,553 1,195 68 37,8 APC 731.8 95.7 380.9 106.6 0.0 2,856.1 0.0 4,171.0 17.5 976.3 708.5 0.0 5,873.4 154.6 0.0 6,02 IMP 611.3 0.0 1,611.5 0.0 0.0 1,614.9 0.0 3,837.7 0.0 672.5 0.0 0.0 4,510.2 577.2 0.0 5,08 Transco - IMP 14.6 0.0 41.0 0.0 0.0 68.6 0.0 124.1 0.0 73.8 0.0 0.0 14.79 17.9 0.0 2.0 17.9 0.0 2.0	West Virginia WPC		15.68	15.67													311
Voltage Totals 2,123 111 5,733 140 360 16,241 39 24,748 18 10,845 885 57 36,553 1,195 68 37,8 APC 731.8 95.7 380.9 106.6 0.0 2,856.1 0.0 4,171.0 17.5 976.3 708.5 0.0 5,873.4 154.6 0.0 6,02 IMP 611.3 0.0 1,611.5 0.0 0.0 1,814.9 0.0 3,837.7 0.0 672.5 0.0 0.0 4,510.2 577.2 0.0 5,085 Transco - IMP 14.6 0.0 41.0 0.0 0.0 68.6 0.0 124.1 0.0 73.8 0.0 0.0 197.9 17.9 0.0 218 KGP 0.0 0.0 0.0 0.0 43.8 0.0 0.0 0.0 197.9 17.9 0.0 218 KPC 257.5 0.0 8.3 0.0 47.5 <t< td=""><td>W. Virginia Total</td><td>382</td><td>16</td><td>329</td><td>0</td><td>0</td><td>1,509</td><td>0</td><td></td><td>18</td><td></td><td>670</td><td>0</td><td></td><td>58</td><td>0</td><td>3,412</td></t<>	W. Virginia Total	382	16	329	0	0	1,509	0		18		670	0		58	0	3,412
APC 731.8 95.7 380.9 106.6 0.0 2,856.1 0.0 4,171.0 17.5 976.3 708.5 0.0 5,873.4 154.6 0.0 6,02 1MP 611.3 0.0 1,611.5 0.0 0.0 1,614.9 0.0 3,837.7 0.0 672.5 0.0 0.0 4,510.2 577.2 0.0 5,08 1Transco - IMP 14.6 0.0 41.0 0.0 0.0 0.0 68.6 0.0 124.1 0.0 73.8 0.0 0.0 197.9 17.9 0.0 21 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Voltage Totals	2,123	111	5,733	140	360	16,241	39					- 0.70			- 10	
MP											,,,,,,,,			00,000	1,100	- 00	57,010
MP	APC	731.8	95.7	380.9	106.6	0.0	2,856.1	0.0	4,171.0	17.5	976.3	708.5	0.0	5,873,4	154.6	0.0	6,028.0
Transco - IMP 14.6 0.0 41.0 0.0 0.0 68.6 0.0 124.1 0.0 73.8 0.0 0.0 197.9 17.9 0.0 21 KGP 0.0 0.0 0.0 0.0 0.0 43.8 0.0 43.8 0.0 0.0 0.0 43.8 29.6 0.0 77 KPC 257.5 0.0 8.3 0.0 47.5 358.1 0.0 671.5 0.0 428.4 166.1 0.0 1,266.0 1.9 0.0 1,266.0 OPC 506.7 0.0 1,455.5 0.0 0.0 3235.3 0.0 5,197.5 0.0 218.6 0.0 391.7 49.2 7,870 Transco - OH 1.4 0.0 19.5 0.0 0.0 246.4 0.0 226.3 0.0 41.1 534.0 22.0 18.6 577 Transco - WV 0.0 0.0 1.4 0.0 226.0 0.0 84.8	IMP	611.3	0.0	1,611.5	0.0	0.0	1,614.9	0.0	3,837.7	0.0	672.5	0.0	0.0				5,087.4
KGP 0.0 0.0 0.0 0.0 0.0 0.0 43.8 0.0 43.8 0.0 0.0 0.0 0.0 0.0 0.0 43.8 29.6 0.0 77 KPC 257.5 0.0 8.3 0.0 47.5 358.1 0.0 671.5 0.0 428.4 166.1 0.0 1,266.0 1.9 0.0 1,266 OPC 506.7 0.0 1,455.5 0.0 0.0 3,235.3 0.0 5,197.5 0.0 2,185.6 0.0 52.9 7,436.0 391.7 49.2 7,877 Transco - OH 1.4 0.0 19.5 0.0 0.0 246.4 0.0 267.3 0.0 262.6 0.0 4.1 534.0 22.0 18.6 57 Transco - WV 0.0 0.0 1.3 0.0 0.0 141.0 0.0 142.3 0.0 26.0 0.0 154.5 0.5 0.5 0.0 155 WPC 0.0 15.7 15.7 0.0 0.0 194.6 0.0 226.0 0.0 84.8 0.0 0.0 310.8 0.0 0.0 31 Eastern AEP 2,123.2 111.4 3,533.7 106.6 47.5 8,758.6 0.0 14,681.1 17.5 4,686.1 884.8 57.1 20,326.6 1,195.3 67.9 21,588 AEP Texas 0 0 0 854 0 0 3,920 0 4,774 0 3,647 0 0 8,421 0 0 0 8,42 SEP 0 0 0 736 0 305 1,460 28 2,530 0 1,573 0 0 0 4,103 0 0 0 4,103 0 0 0 4,11 Transco - OK 0 0 0 2,199 34 313 7,483 39 10,067 0 6,159 0 0 16,226 0 0 0 16,226	Transco - IMP	14.6	0.0	41.0	0.0	0.0	68.6	0.0	124.1	0.0	73.8	0.0	0.0				215.8
KPC 257.5 0.0 8.3 0.0 47.5 358.1 0.0 671.5 0.0 428.4 166.1 0.0 1,266.0 1.9 0.0 1,266.0 OPC 506.7 0.0 1,455.5 0.0 0.0 3,235.3 0.0 5,197.5 0.0 2,185.6 0.0 52.9 7,436.0 391.7 49.2 7,870 Transco - OH 1.4 0.0 19.5 0.0 0.0 246.4 0.0 267.3 0.0 262.6 0.0 4.1 534.0 22.0 18.6 57 Transco - WV 0.0 0.0 1.3 0.0 0.0 142.3 0.0 2.0 10.2 0.0 154.5 0.5 0.0 155 WPC 0.0 15.7 15.7 0.0 0.0 144.0 0.0 226.0 0.0 84.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8<	KGP	0.0	0.0	0.0	0.0	0.0	43.8	0.0	43.8	0.0	0.0	0.0	0.0	43.8			73.4
OPC 506.7 0.0 1,455.5 0.0 0.0 3,235.3 0.0 5,197.5 0.0 2,185.6 0.0 52.9 7,436.0 391.7 49.2 7,876 Transco - OH 1.4 0.0 19.5 0.0 0.0 246.4 0.0 267.3 0.0 262.6 0.0 4.1 534.0 22.0 18.6 577 Transco - WV 0.0 0.0 1.3 0.0 0.0 141.0 0.0 142.3 0.0 2.0 10.2 0.0 154.5 0.5 0.0 155 WPC 0.0 15.7 15.7 0.0 0.0 194.6 0.0 226.0 0.0 84.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0	KPC	257.5	0.0	8.3	0.0	47.5	358.1	0.0	671.5	0.0	428.4	166.1					1,267.9
Transco - OH 1.4 0.0 19.5 0.0 0.0 246.4 0.0 267.3 0.0 262.6 0.0 4.1 534.0 22.0 18.6 577 Transco - WV 0.0 0.0 1.3 0.0 0.0 141.0 0.0 142.3 0.0 2.0 10.2 0.0 154.5 0.5 0.0 155 WPC 0.0 15.7 15.7 0.0 0.0 194.6 0.0 226.0 0.0 84.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0.0 310.8 0.0 0	OPC	506.7	0.0	1,455.5	0.0	0.0	3,235.3	0.0	5,197.5	0.0	2,185.6	0.0	52.9				7,876.9
Transco - WV 0.0 0.0 1.3 0.0 0.0 141.0 0.0 142.3 0.0 2.0 10.2 0.0 154.5 0.5 0.0 155 WPC 0.0 15.7 15.7 0.0 0.0 194.6 0.0 226.0 0.0 84.8 0.0 0.0 310.8 0.0 0.0 310.8 Eastern AEP 2,123.2 111.4 3,533.7 106.6 47.5 8,758.6 0.0 14,681.1 17.5 4,686.1 884.8 57.1 20,326.6 1,195.3 67.9 21,588 AEP Texas 0 0 854 0 0 3,920 0 4,774 0 3,647 0 0 8,421 0 0 8,4 PSO 0 0 608 34 8 1,906 10 2,567 0 635 0 0 3,202 0 0 3,202 0 0 3,202 0 0 3	Transco - OH		0.0	19.5	0.0	0.0	246.4	0.0	267.3	0.0	262.6	0.0					574.7
WPC 0.0 15.7 15.7 0.0 0.0 194.6 0.0 226.0 0.0 84.8 0.0 0.0 310.8 0.0 0.0 311.8 0.0 0.0 310.8 0.0 0.0 311.8 0.0 0.0 310.8 0.0 0.0 311.8 0.0 0.0 310.8 0.0 0.0 32.5 1.58 3.6	Transco - WV		0.0	1.3	0.0	0.0	141.0	0.0	142.3				100000		-		155.0
Eastern AEP 2,123.2 111.4 3,533.7 106.6 47.5 8,758.6 0.0 14,681.1 17.5 4,686.1 884.8 57.1 20,326.6 1,195.3 67.9 21,588 AEP Texas 0 0 854 0 0 3,920 0 4,774 0 3,647 0 0 8,421 0 0 0 8,4 8 1,906 10 2,567 0 635 0 0 3,202 0 0 3,2	WPC	0.0	15.7	15.7	0.0	0.0	194.6	0.0	226.0	0.0	84.8						310.8
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CELEBRATING OVER 80 YEARS

JOANNA A. WALDRON jaw@curtinheefner.com

June 27, 2018

VIA EMAIL (Akanagy@postschell.com)

Anthony Kanagy, Esquire Post & Schell 17 North Second Street, 12th Fl. Harrisburg, PA 17101

RE: Transource Answers to Stop Transource Franklin County Request for Production of Documents and First Set of Interrogatories

Dear Mr. Kanagy:

We are in receipt of your responses to Stop Transource Franklin County's discovery requests. We have not received verifications of any of the Answers to Interrogatories or the Requests for Productions of Documents as required under 52 Pa. Code §§ 1.36, 5.342(a)(6). Please provide verifications immediately. We discuss Stop Transource Franklin County's ("STFC's") objections to Transource's response and objections below and identify what information Transource should provide STFC to avoid motion practice.

As you know, the Public Utility Commission's ("Commission's") regulations regarding discovery requests provides a broad scope of discovery. *City of Pittsburgh v. Pennsylvania Public Utility Com'n*, 526 A.2d 1243, 1249 (Pa. Commw. Ct. 1987). Discovery is permitted of "any matter, not privileged, which is relevant to the subject matter involved in the pending action." 52 Pa. Code § 5.321(c). Transource is required to answer discovery requests fully and completely, in the absence of an objection, and to answer those parts or subparts of interrogatories to which it has no objection. 52 Pa. Code § 5.342(a)(4). Moreover, when a party fails or refuses to answer interrogatories, the Commission's procedural regulations provide for the imposition of sanctions. 52 Pa. Code §§ 5.371, 372 (a)(3) and (4)("catch-all" provision allowing for an order which is just).



Transource's Responses to STFC's Requests for Production of Documents are Insufficient

Unfortunately, Transource's Responses to Request 1, 2, 3, 4, 7, 9, 10-18, 19-23 fail to advise STFC where to find responsive documents that Transource claims it has already provided. Commission regulations require Transource to indicate where to find responsive documents that have allegedly already been provided in response to other discovery, not to simply state that responsive documents have been provided in the responses to other parties' discovery in this proceeding. See 52 Pa. Code. 5.361(a)(4)(c) ("answering party shall specify the location of information."). Please provide more specific information for each request on where additional responsive information has already been provided in discovery responses.

<u>Transource's Relevancy Objections to Requests for Attachments to Documents In Its</u> Application Violate the Regulations and Cannot Form the Basis of an Objection

Transource objects to Requests No. 22, 23 and 24 as irrelevant, even though these requests are merely asking for attachments to emails or letters *produced in the Application*. Request No. 22 seeks the Human Impacts Study conducted in the Susquehanna Roseland Application from email dated September 21, 2017, and Request No. 23 sought the Map referenced in the August 31, 2017 email from USDA/NCRS to Heather Brewster. Request No. 24 seeks attachments to a letter sent by Heather Brewster of Transource's consultant, AECOM. Rather than provide the attachments to the letter, which were specifically requested, including the Agricultural Easement Deeds, Transource provided the same letter again, and without attachments again.

Discovery may be obtained regarding any matter relevant to the subject matter. Relevant evidence is evidence that tends to make an act at issue more or less probable. Moreover, evidence is relevant if it advances the inquiry in some degree and, thus, has probative value. "[A]ny doubts are to be resolved in favor of relevancy and permitting discovery." *Pa. PUC v. Pennsylvania-American Water Co.*, Docket No. R-2011-2232243; 2011 Pa. PUC LEXIS 1523, at *18 (July 21, 2011). There can be no doubt that documents that were transmitted as attachments to emails and letters that Transource included as part of its Application are relevant to this proceeding. Please provide the requested attachments, as required by the Commission's regulations.

<u>Privilege Does Not Apply to the Meetings that Transource's Environmental Consultant Conducted with Public Officials</u>

Transource objects to STFC's Requests No. 19, 20, and 21, as requesting privileged information. The requests sought information related to meetings documented by Transource in its Application with the Department of Environmental Protection, Franklin County Planning Commission, and Department of Conservation and Natural Resources. Under 52 Pa. Code 5.361(a)(3), discovery is limited only where it "relates to a matter that is privileged." The burden rests with the party asserting the privilege to show that the information falls within the



ambit of that privilege. Transource offers no explanation as to what privilege Transource is claiming for a meeting between its consultants and various government officials. Please provide additional information on the privilege that is being asserted; otherwise, provide the requested information.

Information on Water Wells and Water Resources

For the Request for Production of Documents No. 25, STFC sought "All documents that refer or relate to water wells on properties within the proposed right-of-way." Transource objects that is unlikely to lead to the discovery of admissible evidence, and instead answers the limited question of whether water wells are within the proposed right-of-way" and not about water wells located anywhere on properties that are located in the right-of-way of the proposed route. Transource's objection is unfounded because information on water wells on properties located along the proposed route right-of-way is relevant. As you know, the Public Utility Commission is statutorily authorized to coordinate with the Pennsylvania Department of Environmental Protection to insure the purity of water supplied to the public and well water. For example, the Commission makes independent assessments of the safety and reasonableness of herbicide use near well water and streams even where the herbicide is EPA approved in those amounts. *See, Bernardi v. West Penn Power*, Docket No. C-2014-2453852, 2015 WL 7348585 (Pa. P.U.C. 2015) (limiting vegetation management in an area of "flowing or well water" and reviewing whether "Company can be trusted to perform the maintenance in an adequate, just and reasonable way within the meaning of the Public Utility Code.").

Transource alleges that "not all landowners have provided Transource access to their property at this time." While this may have been true at the time of the response, the Court granted access on May 8, 2018 and Transource should update its responses under 52 Pa. § 5.332. Six weeks have elapsed since Transource filed this incomplete answer.

Transource's Response on Request for Production No. 26, which seeks the location of all water wells "hydrologically connected to the proposed right of way" refers back to the response to Request No. 25, which states that there are no water wells in the ROW. This non-responsive answer essentially asserts that there are no wells hydrologically connected in any way. All updated information that Transource has should be provided.

Request No. 3 seeks "Investigation Materials pertaining to surface water, groundwater, air and/or soil quality at, around, in close proximity to, or affected by the IECWest Project." Transource's objection is that the request is overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. This objection is without merit. The IEC Project's potential impact to the groundwater is entirely relevant to the Commission's duties under Art I, § 27, of the Pennsylvania Constitution, the Environmental Rights Amendment. The Commission has a duty to protect Pennsylvania citizens' environmental rights, including the right to clean and pure water, and to act as a trustee of the public natural resources of the Commonwealth. Basic information on Transource's ongoing investigation of the proposed route and its impact is not



only relevant, but also forms the foundation. The Commission cannot meet its constitutional duties without information on the investigation materials relating to water, groundwater, air and/or soil quality related to the proposed IEC Project. Further, Transource's burden to show "minimal environmental impact," "considering the electric needs of the public,' under the PUC regulations. 52 Pa. § 57.76. The objection further makes no sense in the face of Transource's admission in the next paragraph that it is "in the process of completing survey for wetlands and surface waters for the Proposed Route" and for the "300-foot-wide corridor along the proposed transmission line route, 100 foot wide corridor for potential off-right-of-way construction access areas, and up to approximately 1000-foot buffer around certain structures where pulling or wire set-up site may be necessary."

<u>Transource Must Produce PHMC Information Under the Protective Order Entered in this Proceeding</u>

Transource objects to Request No. 5, for Pennsylvania Historic and Museum Commission ("PHMC") information and claims that the CRGIS system terms and conditions make the results of historic resources reviews "confidential." Further, Transource cites to and produced a copy of the Pennsylvania History Code, highlighting an irrelevant provision exempting information from disclosure under the Right to Know Law. The Right to Know Law has no application in this context; moreover, STFC has signed the Protective Order in this proceeding which allows for exchange of information that otherwise would be confidential. STFC is entitled to this information under 52 Pa. Code § 5.321.

<u>Transource Must Produce the Proprietary Version of the Project 9A Proposal And Other</u> Confidential Information Under the Protective Order

Transource objects to Request No. 6, which seeks, among other things, documents that relate to how the IEC West Project could affect surface water, groundwater, air, and/or soil quality, and/or health of humans, wildlife and/or aquatic life." Transource does not separately object to this request, but only provides a public version of its Proposal for Project 9A. Each response to Interrogatories Nos. 6, 7, 8 and 11 states that Transource's witnesses relied on "Transource's Proposal that was submitted to PJM." A party may obtain discovery of any matter relevant to the subject matter involved. Clearly, the Proposal for Project 9A is fundamental to Transource's application to construct Project 9A. 52. Pa. Code §§ 5.323(a); 324(a). STFC has signed the Protective Order, and is entitled to see the non-public version of the Proposal for Project 9A, on which Transource's witnesses base their testimony. Please provide the requested information.

Insufficient Responses

Transource's answer to Request No. 6 is insufficient in that it merely refers back to the documents in the Siting Study, and provides only one document related to Human Health that was produced in a Fact Sheet on Stray Voltage. Transource must provide a full and complete



answer. Due process requires that parties be permitted to discover the basis for an opposing party's case so that parties can adequately prepare for litigation. *See, e.g., Gaudenzia, Inc. v. Zoning Board of Adjustment of City of Philadelphia*, 287 A.2d 698 (Pa. Commw. Ct. 1972). Please provide a complete answer to Request No. 6.

Transource provides a summary chart already provided in its Application in response to Request No. 18, which sought "all documents that refer to or constitute in any way communications." A summary chart is not a substitute for a complete discovery response. Please provide all documents that refer to communications.

In addition, Transource should provide updates to its responses to Request Nos. 7 and No. 8, on the soil samples and wetlands delineations that have been completed to date, pursuant to 52 Pa. Code § 5.332, as the studies are being completed. Please update responses to Requests No. 7 and 8 as additional information becomes available. 52 Pa. Code § 5.332.

Interrogatories

Transource's answer to STFC's First Set of Interrogatories is likewise deficient. In Transource's response to Interrogatory No. 3, it is unclear whether the answer is complete, as Craig Lockwood is a person listed as assisting with preparation, but is not listed as a person with knowledge of facts for the preparation of Transource's Applications, in Attachment 1. Mr. Lockwood's role should be clarified and/or the Attachment should be updated.

Transource's answer to Interrogatory No. 5 does not provide an identification of what testimony Transource's witnesses relied on in formulating their written statements and opinions within those statements. Pursuant to 52 Pa. Code § 5.324(a), STFC is entitled to discover the facts and opinions to which the expert is expected to testify and basis for those opinions, consistent with Pa. R. C. P. 4003.5.

Many of Transource's answers to STFC's Interrogatories are troubling. First, in Interrogatory No. 25, STFC asks Transource to "identify the maximum width that the proposed right-of-way would occupy, reference by Ms. Simmons in her statement at p. 19, as 'approximately 130 feet, 65 feet either side." Transource equivocates even more in its answer. Rather than provide what the maximum width of the right-of-way would be, Transource stated that "the permanent right-of-way is planned to be *approximately* 130 feet." (emphasis added). This approximation is not responsive, and violates 52 Pa. Code § 5.342(a)(4).

Transource's objection to Interrogatory No. 26 is not a valid objection. STFC asks Transource to "identify all generators on the PJM grid who can 'participate in competitive wholesale market to supply electricity,' as referenced by Mr. Ali. at P. 4. First, Transource claims that the information is "in no way relevant to the project that is being proposed in the Siting Application." And Transource further alleges that "the information requested is not maintained as requested." The identity of generators who can use the transmission grid is



relevant to Transource's request to expand that grid, with a project that is allegedly designed to alleviate congestion on the transmission grid, and which Transource claims "has economic or wholesale market effects." The fact that information is not maintained as requested does not equal an "unreasonable investigation" pursuant to 52 Pa. Code §5.361. *Commonwealth of Pa. v. Blue Pilot Energy, LLC*, 2015 WL 1291555 Docket No. C-2014-2427655 (Pa.P.U.C. 2015).

Transource's Response to Interrogatory No. 31, refers back to No. 26. Interrogatory No. 31 asks Transource to "identify the origin of the lower-priced energy that is prevented from 'flowing freely' on the grid as referenced by Mr. Ali at P. 6." Mr. Ali's explanation forms the basis of Transource's demonstration of need for the project. According to Mr. Ali, congestion is caused when lower-priced energy is "prevented from flowing freely on the grid" and that the congestion is at the AP-South Interface. The Interrogatories ask that Mr. Ali explain how his testimony describing "congestion constraints" applies to the IEC Project. Instead of answering, Transource only points to its response to No. 26 and No. 32, and suggests that the Interrogatory mischaracterizes the testimony. Transource should explain where lower-priced energy on the grid arises from because Transource designed the IEC Project to increase the ability of that lower-price energy to flow. STFC Interrogatories No. 26, 31, and 32, are proper and relevant, and must be answered.

Reference to Material Already Included in its Application is Insufficient

Transource's response on Interrogatory No. 12 is deficient. The Interrogatory seeks communication by Transource or its consultants related to any of the permits identified in the Permit Matrix. Transource's response points to documents provided in the Siting Application, which was filed in December. STFC is entitled to discover the actual documents and communications related to the permits. Again, the Commission cannot fulfill its duties to protect Pennsylvanians' environmental rights without knowing what communications were made related to the permitting process.

Likewise, Transource's answer to Interrogatory No. 27, which requests "every instance in the last ten (10) years in which PJM has 'identified a need to relieve congestion'" is non-responsive. Transource does not object to Interrogatory No. 27, but Transource only provides an explanation that Mr. Ali's statement is a "general statement" and then references to PJM's website for more information. In the absence of an objection, Transource must answer the interrogatory. Here, Transource's failure to answer leaves STFC and the Commission without any context on market efficiency projects and the relationship to the IEC Project. 52 Pa. Code § 5.342(c)(2). Transource should provide an additional response.

Transource did not object to Interrogatory No. 16, and fails to answer it. STFC asks Transource to "describe and identify all of the efficiency projects that AEP and GPE "annual manage" and what is the dollar amount of those efficiency projects as referenced by Ms. Simmons on P. 9, line 19. Transource's answer is non-responsive, because it does not address



efficiency projects and the dollar amounts in any way, and repeats only information that was already stated in Ms. Simmons' statement regarding transmission lines generally.

Again, for Interrogatory No. 35, Transource refers only to information already provided in the Siting Study, for a discussion of the corridor analyzed, rather than identify each time that the proposed Route was unable to use parallel alignments along existing utility rights-of-way.

Transource's response on Interrogatory No. 28 is unclear, in that the provided Table of Approved Projects by PJM has a number of blanks under the "Project Status" Column, as well as a few listed as either "Under Construction" or "In Service." Additional explanation of the Status of the other projects (the vast majority of them), should be included.

Transource's answer to Interrogatory No. 33 does not provide documents that it identifies in its answer, on the basis that the information is Critical Energy/Electric Infrastructure Information ("CEII") that will be provided on request, and because it is "not relevant." Please provide the relevant information under the terms of the Protective Order.

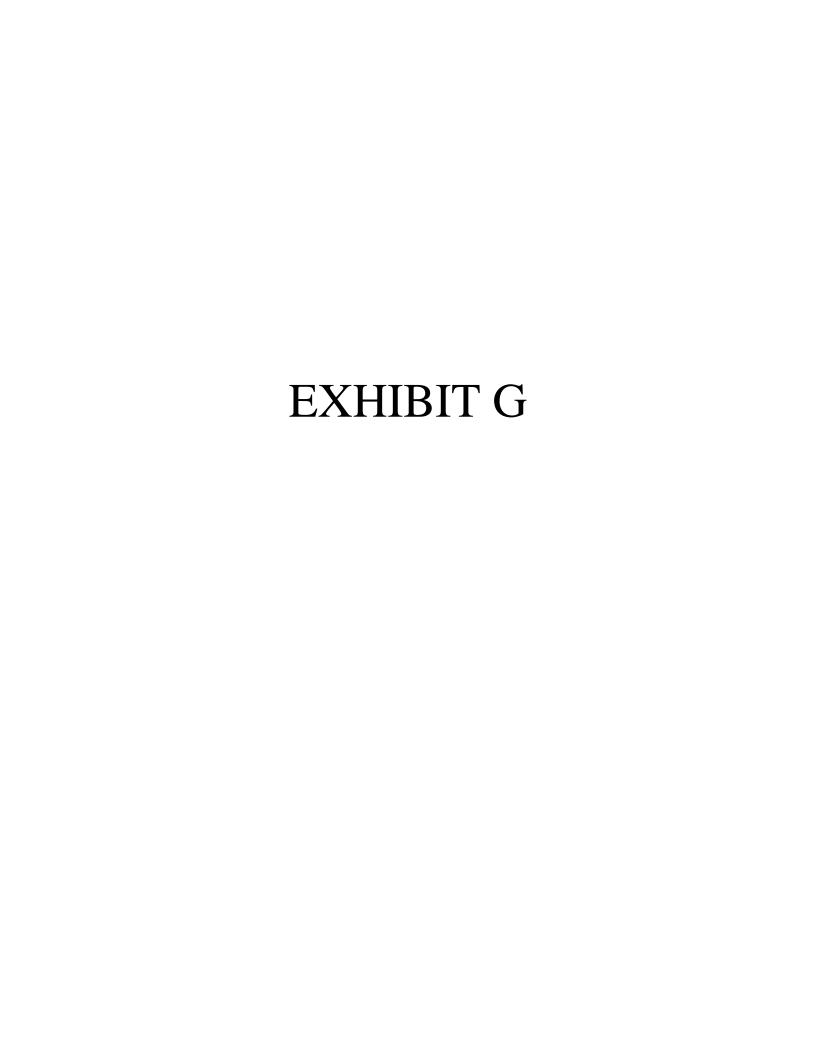
Conclusion

We look forward to receiving your updated and corrected responses on the Requests and Interrogatories identified on or before July 11, 2018. In the meantime, please do not hesitate to contact us to discuss the matter.

Very truly yours,

Joanna A. Waldron, Esquire

For CURTIN & HEEFNER LLP





17 North Second Street 12th Floor Harrisburg, PA 17101-1601 717-731-1970 Main 717-731-1985 Main Fax www.postschell.com

Lindsay A. Berkstresser

lberkstresser@postschell.com 717-612-6021 Direct 717-731-1977 Direct Fax File #: 166570

July 27, 2018

VIA E-MAIL & REGULAR MAIL

Jordan B. Yeager, Esquire Mark L. Freed, Esquire Joanna A. Waldron, Esquire Curtin & Heefner LLP 2005 S. Easton Road, Suite 100 Doylestown, PA 18901

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 Counsel:

Enclosed are Supplemental Responses of Transource Pennsylvania, LLC to the Request for Production of Documents of Stop Transource Franklin County – Set I, Nos. 1 - 7, 9 - 21, 24 and 25, in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Due to the voluminous nature of the attachments, CDs will be provided to counsel for Stop Transource Franklin County and the Office of Consumer Advocate. CDs will be provided to other parties upon request.

Jordan B. Yeager, Esquire July 27, 2018 Page 2

Sincerely,

Lindsay A. Berkstresser

LAB/jl Enclosures

cc: Certificate of Service

Rosemary Chiavatta, Secretary (Letter & Certificate of Service Only)

CERTIFICATE OF SERVICE Docket Nos. A-2017-2640195 & A-2017-2640200, et al.

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

Dianne E. Dusman, Esquire Darryl Lawrence, Esquire Phillip D. Demanchick, Esquire David T. Evrard, Esquire Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923

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Darwyn Benedict 410 N. Grant Street Waynesboro, PA 17268

Date: July 27, 2018

3

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-01:

All documents that refer or relate in any way to PJM's Market Efficiency Project 9A ("Project 9A.")

Response:

Transource has objected to Question No. 1 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Supplemental Response:

Please see the following interrogatories where the Company has addressed or discussed "Project 9A".

OCA I: Questions 2

OCA II: Ouestions 2, 4, 5, 11, 12, 14, 16

OCA IV: Questions 1, 3, 4, 5, 6, 7, 13, 20, 21, 44, 47, 52

OCA V: Question 1

OCA VI: Questions 1, 2, 3

OCA VII: Questions 2, 3, 4, 5

OCA VIII: Questions 1, 2, 3, 4

OCA IX: Questions 1, 10

OCA X: Questions 1, 2, 6

OCA XI: Questions 1, 2, 3, 4, 5, 10, 11, 12, 13

OCA XIII: Questions 1, 6, 4, 5, 8, 9, 10, 11, 14, 18,

OCA XVII: Ouestion 1

OCA XVIII: Questions 16, 17, 18, 19, 21, 22

OCA XX: Questions 1, 2, 3, 4, 5, 6, 7, 8, 9, 10

OCA XXI: Questions 1, 2, 3, 4

OCA XXII: Question 1

Witness: Kamran Ali

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-02:

All documents that refer to, relate to in any way, or constitute in any way the Siting Study.

Response:

Transource has objected to Question No. 2 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please refer to the references provided in the IEC West Siting Study (Section 6) for a list of citations for the references used during the development of the Siting Study. Also, please see Appendix A to the Siting Study for a list of GIS data sources that were used during the development of the Siting Study. Please see the attachments for additional information. Please see STFC-01-D-02 Attachments 1 through 6 for additional information and all of the Company's responses to STFC-01D.

Supplemental Response:

All non-privileged responsive documents that have been identified have been provided.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-03:

All documents that constitute Investigation Materials pertaining to surface water, groundwater, air, and/or soil quality at, around, in close proximity to, or affected by the IEC West Project.

Response:

Transource has objected to Question No. 3 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

The Company is in the process of completing surveys for wetlands and surface waters for the Proposed Route on the IEC West Project. The survey area encompasses a 300-foot-wide corridor along the proposed transmission line route, 100-foot-wide corridor for potential off-right-of-way (ROW) construction access areas, and up to an approximately 1,000-foot buffer around certain structures where pulling or wire-set-up sites may be necessary during construction of the Project. Although not all parcels are currently surveyed, the wetland delineation forms for the surveyed parcels are included as STFC 01D-3 Attachment 1. A formal wetland delineation report for the Proposed Route will be completed once all parcels have been surveyed. In addition, a Wetland Delineation Report was completed for the Rice Substation Site (please see STFC 01D-3 Attachment 2).

The Company has retained a geo-technical consultant to complete soil borings at certain locations along the Proposed Route. The surveys have not been completed; therefore, the results are still preliminary in nature and subject to editing during the final review. The preliminary soil borings logs are included as STFC 01D-03 Attachment 3.

The Company used a variety of GIS data resources during the development of the Siting Study. Appendix A of the Siting Study contains a list of the GIS data collected and the source of the information. Transource does not own this data and cannot distribute it to other parties per the terms of the agreement for downloading the information. However, it is readily available for download at the sources provided, subject to any requirements from those sources.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Supplemental Response:

The Company is providing additional survey forms for geo-technical work (STFC 01D-03 Attachment 4), wetland surveys (STFC 01D-03 Attachment 5), and the property boundary surveys (STFC 01D-03 Attachment 6) that have completed since the Company responded to the original request. Please note the property boundary information can only be viewed via AutoCad Software. All non-privileged responsive documents that have been identified have been provided.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-04:

All documents that refer or relate to waters of the Commonwealth, as defined in the Clean Streams Law, at, around, in close proximity to the Project Study Area, including location and inventory of such waters.

Response:

Transource has objected to Question No. 4 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding. These are being provided as STFC-01D-04 Attachments 1 through 10.

The Company used publicly available GIS data to identify water resources within the Project Study Area for the purposes of the Siting Study. The source of this data is referenced in Appendix A of the IEC West Siting Study (Attachment 3 to the Siting Application). In addition, Section 4.1 Natural Resources; Water Resources (beginning on pages 36 of the Siting Study) discusses specific streams and/or waterways with special designations per Pennsylvania Code Title 25, Water Quality Standards (Chapter 93). The citations referenced in this section of the Siting Study are included in Section 6: References, with hyperlinks to the corresponding information. Please see the Company's responses to STFC 01D-9, STFC 01D-10, and STFC 01D-12 for additional information related to Transource's agency coordination activities.

Supplemental Response: Please see the Company's supplemental response to STFC 01D-03 and associated attachments.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-05:

All documents that refer to, relate to, or constitute in any way Investigation Materials pertaining to the Project Study Area.

Response:

Transource has objected to Question No. 5 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the Company's response to STFC 01D-3 for information related to the wetland and surface water delineations.

The Company has also retained Burns and McDonnell to complete archaeological surveys. Cultural resources field surveys are being performed for designated high probability areas (for containing cultural resources) for the potential transmission line alignment in Franklin County, PA where land access is allowed, which includes an approximately 300-foot-wide corridor along the potential transmission line alignment, 100-foot-wide corridors for potential off-right-of-way (ROW) construction access areas, and up to an approximately 1,000-foot buffer area around certain structures where pulling or wire-set-up sites may be necessary during construction of the Project. A historic resources review is also being conducted for areas within a half mile of the preliminary project alignment. The results of these surveys are confidential and are not provided in this response. Please note the language protecting this information is included in the STFC-01D-05 Attachments 1-3 as applicable.

The Company completed several field reviews during the Study Segment phase of the project. Please see the Company's response to STFC 01D-2 for data collected during these field reviews.

Supplemental Response:

Please see the Company's supplemental response to STFC 01D-03 and the associated attachments. The following field work has been completed for the IEC West Project, however,

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

reports based on that field work are currently being drafted and will be supplied in a supplemental response at a later date:

- 1) Bald Eagle Nest Survey
- 2) Lance leaf buckthorn surveys
- 3) Northeastern bulrush surveys
- 4) Cultural resource surveys
- 5) Bat surveys
- 6) Eastern spadefoot toad habitat screening
- 7) Wetland delineation surveys (STFC 01D-03 Attachment 5)
- 8) Property boundary surveys (STFC 01D-03 Attachment 6)
- 9) Soil borings (STFC 01D-03 Attachment 4)

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-06:

All documents that refer or relate to how the Project 9A and/or the IEC-West Project can or could affect surface water, groundwater, air, and/or soil quality, and/or health of humans, wildlife, and/or aquatic life.

Response:

Please see the Company's response to STFC 01D-3 above. In addition, the IEC West Siting Study, Section 4: Alternative Route Comparison, discusses the potential impacts to the natural and human environment, specifically soil and water resources, wildlife habitat and sensitive species, agricultural and forestry resources, recreation and conservation lands, developed land use, historic and archeological resources, and scenic resources. The referenced information in these sections is provided in Section 6 (References) and Appendix A (GIS Data Sources). Please see the Company's response to STFC 01D-2, specifically Attachments 5 and 6 for a comparative table of factors considered during the siting process.

A factsheet on Stray Voltage is provided on the Company's website (listed above) and is included as STFC 01D-6 Attachment 1.

The public version of the Project 9A proposal is available at: [http://www.pjm.com/-/media/planning/rtep-dev/expan-plan-process/ferc-order-1000/rtep-proposal-windows/redacted-public-proposals/201415-1-9a-dominion-high-voltage-transource-public-redacted-version-southern-pa.ashx?la=en].

Supplemental Response:

All non-privileged responsive documents that have been readily identified have been provided. StopTransource Franklin County has not completed the CEII process to date. Therefore, the "Proprietary version" of Project 9A's proposal cannot be provided. Once the CEII process has been completed, Transource will update this response with the requested information.

The Company is still evaluating whether a revised confidential version can be provided that excludes CEII.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-07:

All documents that refer or relate to groundwater in the Project Study Area, including but not limited to flow and infiltration paths and patterns, the water table, the aquifer system(s), and soil and/or geologic characteristics.

Response:

Please see the Company's response to STFC 01D-3.

Supplemental Response:

All non-privileged responsive documents that have been identified have been provided.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-09:

All documents that refer to or constitute in any way communications between you and the Pennsylvania Department of Environmental Protection about permits, applications, and/or review related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 9 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the STFC-01D-09 Attachments 1 through 11 in response to this request. Some of the documents were originally marked confidential because they were confidential at the time they were used. The original marking has not been removed; however, those documents are no longer considered confidential. Please note that the production headers do not indicate a confidential designation.

Supplemental Response:

All non-privileged responsive documents that have been identified have been provided.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-10:

All documents that refer to or constitute in any way communications between you and the U.S. Army Corps of Engineers, about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 10 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see STFC-01D-10 Attachments 1 through 7 in response to this request.

Supplemental Response:

All non-privileged responsive documents that have been identified have been provided.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-11:

All documents that refer to or constitute in any way communications between you and the U.S. Fish and Wildlife Service about permits, applications, or reviews related to the IECWest Project or the Siting Study.

Response:

Transource has objected to Question No. 11 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the STFC-01D-11 Attachments 1 through 6 in response to this request.

Supplemental Response:

The Company is providing email communications that have occurred since the original response. Please see STFC 01D-11 Attachments 7-10. All non-privileged responsive documents that have been identified have been provided.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-12:

All documents that refer to or constitute in any way communications between you and the Pennsylvania Fish and Boat Commission, about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 12 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the STFC-01D-12 Attachments 1 through 8 in response to this request.

Supplemental Response:

All non-privileged responsive documents that have been identified have been provided.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-13:

All documents that refer to or constitute in any way communications between you and the Pennsylvania Game Commission about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 13 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see STFC-01D-13 Attachment 1 in response to this request.

Supplemental Response:

The Company is providing an additional communication that has occurred since the original response. Please see STFC 01D-13 Attachment 2. All non-privileged responsive documents that have been identified have been provided.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-14:

All documents that refer to or constitute in any way communications between you and the Pennsylvania Department of Conservation and Natural Resources about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 14 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see STFC-01D-14 Attachments 1 through 6 in response to this request. The list of attendees for the July meeting included the following individuals:

Edward Muzic
Nathan Crawford
Scott Williamson
Bob Conrad
Nathan Phillips
John Chripzuk
Barry Baker
Laurie Spears (participated by phone)
Rob Everard (participated by phone)

Supplemental Response:

All non-privileged responsive documents that have been identified have been provided.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-15:

All documents that refer to or constitute in any way communications between you and the Pennsylvania Historical and Museum Commission about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 15 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see STFC-01D-15 Attachments 1 through 15 in response to this request. Maps with the locations of sensitive archaeological resources has been redacted due to the sensitive nature of this information. Please refer also to the Company's response to STFC-01D -05.

Supplemental Response:

All non-privileged responsive documents that have been identified have been provided with the exception of those previously redacted.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-16:

All documents that refer to or constitute in any way communications between you and the Pennsylvania Department of Agriculture about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 16 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see STFC-01D-16 Attachments 1 through 5 in response to this request.

Supplemental Response:

All non-privileged responsive documents that have been identified have been provided.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-17:

All documents that refer to or constitute in any way communications between you and the Franklin County Conservation District about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 17 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the Company's response to STFC-01D-9 for responsive documents. The Company notes that the November 21, 2017 meeting reflected in those documents included representatives from the Franklin County Conservation District.

Supplemental Response:

All non-privileged responsive documents that have been identified have been provided.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-18:

All documents that refer to or constitute in any way communications between you and any other state, federal, or local agency about permits, applications, or reviews related to the IEC-West Project or the Siting Study.

Response:

Transource has objected to Question No. 18 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please refer to the Company's Siting Application and all previous requests under STFC 01D. These documents reflect the communications between the Company and the Commonwealth of Pennsylvania, and federal or local agencies for the IEC West Project.

Supplemental Response:

The Company is providing additional communications with agencies (not already specifically addressed in a data request above) that have occurred since the original response. Please see STFC 01D-18 Attachments 1-4. All non-privileged responsive documents that have been identified have been provided.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-19:

All documents relating to the April 10, 2017 meeting at the office of the Pennsylvania Department of Agriculture involving Laurie Spears, Doug Wolfgang, Barry Baker and Dave Yenzuita.

Response:

Transource has objected to Question No. 19 as requesting privileged information. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please refer to the Company's response to STFC 01D-16 in particular STFC 01D-16 Attachments 4 and 5 which include the maps discussed with Doug Wolfgang as it pertains to the IEC West Project.

Supplemental Response:

Privileged information relates to internal communications with attorneys.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-20:

All documents relating to the March 8, 2017 meeting at the office of Franklin County Planning Commission involving Laurie Spears, Barry Baker, Dave Yezuita, Phil Tarquino, Rochelle Barvincheck and Elizabeth Grant.

Response:

Transource has objected to Question No. 20 as requesting privileged information. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

A meeting summary was prepared by AECOM for the March 8, 2017 meeting and is included with this response as STFC-01D-20 Attachment 1. This summary was not reviewed by Franklin County and only served as internal notes for AECOM and the Company.

Supplemental Response:

Privileged information relates to internal communications with attorneys.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-21:

All documents relating the September 20, 2017 meeting at Pennsylvania Department of Conservation and Natural Resources Bureau of Forestry, with Laurie Speers, Barry Baker, Heather Spears, Chris Plank, Dave Mong, Roy Brubaker and Rebecca Bowen.

Response:

Transource has objected to Question No. 21 as requesting privileged information. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see the Company's response to STFC 01D-14, specifically Attachments 2 and 3.

Supplemental Response:

Privileged information relates to internal communications with attorneys.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-24:

All attachments referenced in the November 8, 2017 letter of Heather Brewster to Hathaway Jones, of the USDA/NRCS regarding Natural Resources Conservation Service Agricultural Easements, including the Proposed Route Aerial Maps, Shapefile of Proposed Routes w/Parcel Data, List of Notified Landowners with Parcel Data, and Agricultural Easement Deeds.

Response:

Transource has objected to Question No. 24 as irrelevant to the pending Siting Application. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

Please see STFC-01D-24 Attachments 1 through 4. Please note that certain information has been redacted from the shapefiles to protect landowner privacy.

Supplemental Response:

Please see STFC 01D-24 Attachments 5- 12 for the mailing list and agricultural easement deeds. All other information was provided in the original request.

Production of Documents for Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01D-25:

All documents that refer or relate to the water wells on properties within the proposed right-ofway.

Response:

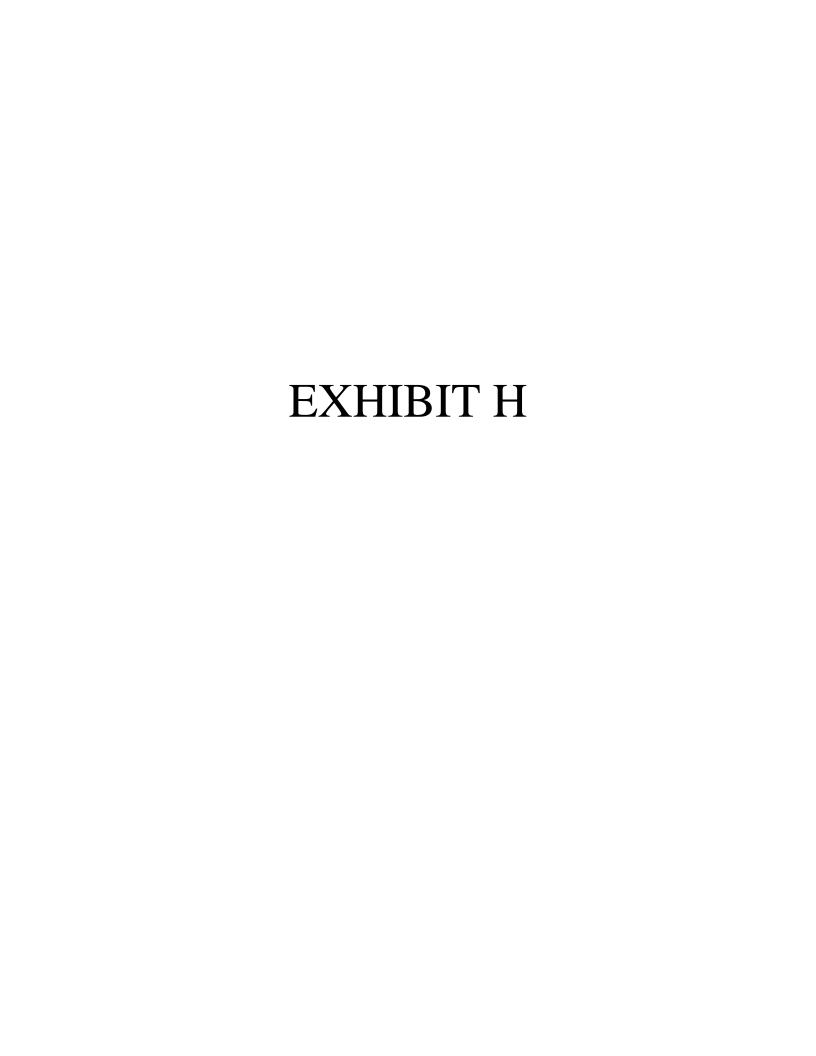
Transource has objected to Question No. 25 as overly broad, irrelevant and unlikely to lead to the discovery of admissible evidence. In the Objection, Transource explained that it would provide responsive information that was readily available and would not require an unreasonable search. Notwithstanding or waiving this Objection, Transource notes that responsive documents are being provided with the responses to Stop Transource Requests for Production of Documents and Interrogatories and in the responses Transource has provided to other parties' discovery in this proceeding.

To the Company's knowledge, there are no water wells within the proposed right-of-way. The Company notes that not all landowners have provided Transource access to their property at this time.

Supplemental Response:

To the Company's knowledge, no water wells are within the proposed right-of-way.

Witness: Thomas O. Schaffer





17 North Second Street 12th Floor Harrisburg, PA 17101-1601 717-731-1970 Main 717-731-1985 Main Fax www.postschell.com

Lindsay A. Berkstresser

lberkstresser@postschell.com 717-612-6021 Direct 717-731-1977 Direct Fax File #: 166570

July 27, 2018

VIA E-MAIL & REGULAR MAIL

Jordan B. Yeager, Esquire Mark L. Freed, Esquire Joanna A. Waldron, Esquire Curtin & Heefner LLP 2005 S. Easton Road, Suite 100 Doylestown, PA 18901

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 Counsel:

Enclosed are the Supplemental Responses of Transource Pennsylvania, LLC to the Interrogatories of Stop Transource Franklin County – Set I, Nos. 3, 12, 16, 25, 28, 31, 33 and 35, in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Singerely,

Lindsay A. Berkstresser

LAB/il

Jordan B. Yeager, Esquire July 27, 2018 Page 2

Enclosures

cc: Certificate of Service

Rosemary Chiavatta, Secretary (Letter & Certificate of Service Only)

CERTIFICATE OF SERVICE Docket Nos. A-2017-2640195 & A-2017-2640200, et al.

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

Dianne E. Dusman, Esquire Darryl Lawrence, Esquire Phillip D. Demanchick, Esquire David T. Evrard, Esquire Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923

Sharon E. Webb, Esquire Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, PA 17101

Romulo L. Diaz, Jr., Esquire Jack R. Garfinkle, Esquire Jennedy S. Johnson, Esquire PECO Energy Company 2301 Market Street Philadelphia, PA 19103 PECO

Jordan B. Yeager, Esquire Mark L. Freed, Esquire Joanna A. Waldron, Esquire Curtin & Heefner LLP 2005 S. Easton Road, Suite 100 Doylestown, PA 18901 Stop Transource Franklin County

Teresa K. Harrold, Esquire FirstEnergy Service Company 2800 Pottsville, Pike, PO Box 16001 Reading, PA 19612-6001 MAIT Kimberly A. Klock, Esquire Amy E. Hirakis, Esquire PPL Services Corporation Two North Ninth Street Allentown, PA 18101 PPL Electric Utilities Corporation

Karen O. Moury, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
Maple Lawn Farms, Inc., Rose Tree-Blue
Mountain Hunt Club, Inc. &
Citizens to STOP Transource

Thomas J. Sniscak, Esquire Whitney E. Snyder, Esquire 100 North Tenth Street Harrisburg, PA 17101 York County Planning Commission

Linus E. Fenicle, Esquire Reager & Adler, PC 2331 Market Street Camp Hill, PA 17011 Quincy Township

Barron Shaw Jana Shaw 445 Salt Lake Rd Fawn Grove, PA 17321

John L. Munsch, Esquire 800 Cabin Hill Drive Greensburg, PA 15601 MAIT & West Penn Power

VIA FIRST CLASS MAIL

Byron Jess Boyd 831 New Park Road New Park, PA 17352

Hugh McPherson 2885 New Park Road New Park, PA 17352

J Ross McGinnis, Esquire 41 West Main Street Fawn Grove, PA 17321

Fred Byers 1863 Coldsmith Rd Shippensburg, PA 17257

Michael Cordell 4219 Altenwald Rd Waynesboro, PA 17268

Roy Cordell Emma Cordell 4690 Fetterhoff Chapel Road Chambersburg, PA 17202

Aaron Kauffman Melinda Kauffman 4220 Old Scotland Rd Chambersburg, PA 17202

Colt Martin Kristyn Martin 8020 Hidden Valley Rd Waynesboro, PA 17268

Leonard Kauffman Mary Kauffman 4297 Olde Scotland Rd Chambersburg, PA 17202 Allen Rice Lori Rice 1430 Henry Lane Chambersburg, PA 17202

Lois White 1406 Walker Road Chambersburg, PA 17202

Willa Weller Kaal 67 Summer Breeze Lane Chambersburg, PA 17202

Allan Stine Heather Stine 867 Cider Press Road Chambersburg, PA 17202

Karen Benedict Rodney Myer 5413 Manheim Rd Waynesboro, PA 17268

Lantz Sourbier Laura Sourbier 64 Edgewood Cir Chambersburg, PA 17202

Ashley Hospelhorn 8010 Hidden Valley Ln Waynesboro, PA 17268

Ashley Hospelhorn 116 West 3rd Street Waynesboro, PA 17268

Danielle Bernecker 1827 Wood Duck Dr E Chambersburg, PA 17202

Courtney & Derek Dettinger 24 Chanceford Rd Brogue Pa 17309 James McGinnis, Jr. 290 Woolen Mill Road New Park, PA 17352

Darwyn Benedict 410 N. Grant Street Waynesboro, PA 17268

Date: July 27, 2018

3

Interrogatories of Stop Transource in Franklin County (Supplemental Responses dated 7/27/2018)

Data Request STFC-01-03:

Identify all persons other than counsel of record for Transource, who directly participated in the preparation of the answers to these interrogatories.

Response:

The following persons directly participated in the preparation of the answers to these interrogatories. Additional personnel who may have performed incidental tasks but did not contribute to the content reflected in the of the answers to these interrogatories are not included.

Similarly, support personnel assisting counsel of record, PJM's Counsel, and the Company's counsel are also not included. Barry Baker Heather Brewster

Rob Everard

Craig Lockwood

Nicole Burfeind

Paul McGlynn

Peggy Simmons

Laurie M. Spears

Stephen P Stein

Refer to the Company's response to STFC 01-1 for additional details concerning each person.

Supplemental Response:

To further clarify, interrogatory 1 asked for individuals that assisted with the Siting Study. This interrogatory asks for individuals who participated in the response to the interrogatories. The lists provided to each interrogatory are complete and responsive. Craig Lockwood is a Principal Engineer in Transmission Planning at AEP.

Witness: Counsel

Interrogatories of Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01-12:

Please identify each and every communication that you or any of your consultants, including, but not limited to AECOM, have had related to each and every permit listed in the Preliminary Permit Matrix, Attachment 6 of the Siting Application and produce any documents that in any way reference those communications.

Response:

Please refer to the documents provided in the Siting Application, Attachment 12 and responsive documents provided by the Company under STFC 01 D.

Supplemental Information:

All non-privileged responsive documents that have been readily identified have been provided in the original response to STFC 01 D, the application, or the supplemental information to STFC 01D.

Interrogatories of Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01-16:

Describe and identify all of the efficiency projects that AEP and GPE "annually manage" and what is the dollar amount of those efficiency projects as referenced by Ms. Simmons on P. 9, line 19.

Response:

Please refer to Ms. Simmons' testimony at page 9, line 19. The statement indicating that AEP and GPE annually manage more than \$2 billion in projects and have extensive experience in projects of a magnitude comparable to the Independence Energy Connection Project refers to transmission projects in general, and is not limited to market efficiency projects. General information about these projects, which varies over time, is available publicly, for example, at [http://aeptransmission.com/].

Witness: Peggy I. Simmons

Interrogatories of Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01-25:

Please identify the maximum width that the proposed right-of-way would occupy, referenced by Ms. Simmons in her statement at p. 19 as "approximately 130 feet, 65 feet either side."

Response:

Based on the current design for the Project, the permanent right-of-way is planned to be approximately 130 feet.

Supplemental Response:

As indicated in the previous response, the transmission line is still in the design phase. Based on the current design, the right-of-way does not currently exceed the 130 foot width indicated in the application. If the design results in a right-of-way greater than 130 feet at a specific location, this response will be updated to reflect the change.

Witness: Peggy I. Simmons

Interrogatories of Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01-28:

Identify all of the "Market Efficiency Projects" for which PJM has opened a Long Term Proposal Window, and describe which have been built and where those Market Efficiency Projects have been built in the last 10 years.

Response:

There is no such thing as "all of the "Market Efficiency Projects" for which PJM has opened a Long Term Proposal Window." PJM opens a Long-Term Proposal Window to solicit market efficiency projects to address identified congestion issues; not the other way around.

Please refer to STFC 1-28 Attachment 1 for a list of PJM Board-approved market efficiency projects arising out of competitive windows since 2013. The 2013 Market Efficiency Proposal Window was the first of such proposal window opened by PJM. The 2014/2015 Long Term Proposal Window, in which Project 9A was submitted, was the first of such proposal window opened by PJM subsequent to FERC's Order 1000.

Witness: Paul F. McGlynn

Approved Project	PJM Baseline ID Number(s)	1 ² .3M Market Efficiency Windows	1 ² .3M Board Approval Date	Project Status
Install 2nd Hunterstown 230/115 kV transformer, Reconductor Hunterstown - Oxford 115 kV line, Replace the Hunterstown 115 kV breaker '96192' with 40 kA rated breaker	b2452, b2452.1, b2552.3	2013 Market Efficiency Proposal Window (Conducted prior to the implementation of Order No. 1000)	2/11/2014	In Service
Reconductor two spans of the Graceton - Safe Harbor 230 kV transmission line including termination point upgrades.	b2690	2014/15 RTEP Long Term Proposal Window	10/15/2015	
Reconductor three spans limiting Brunner Island - Yorkana 230 kV line; add one breaker to Brunner Island switchyard; upgrade associated terminal equipment.	b2691	2014/15 RTEP Long Term Proposal Window	10/15/2015	In Service
Replace terminal equipment at AEP's Danville and East Danville substations to improve thermal capacity of Danville - East Danville 138 kV circuit	b2697.1, b2697.2	2014/15 RTEP Long Term Proposal Window	10/15/2015	
Replace relays at AEP's Cloverdale and Jackson's Ferry substations to improve the thermal capacity of Cloverdale - Jackson's Ferry 765 kV line	b2698	2014/15 RTEP Long Term Proposal Window	10/15/2015	
Tap the Conemaugh - Hunterstown 500 kV line and build new 230 kV double circuit line between Rice and Ringgold. Build new 230 kV double circuit line between Furnace Run and Conastone. Rebuild of the Conastone - Northwest 230 kV line. Replace the Ringgold #3 and #4 transformers with 230/138 kV autotransformers Ringgold bus reconfiguration. Reconductor of Ringgold-Catoctin 138 kV. [Transource 9A project.]	b2743, b2752	2014/15 RTEP Long Term Proposal Window	8/2/2016	·
Replace L7915 B phase line trap at Wayne substation		2014/15 RTEP Long Term Proposal Window	10/1 ⁵ /₂015	
Mitigate sag limitations on Loretto - Wilton Center 345 kV Line and replace station conductor at Wilton Center	i i	2014/15 RTEP Long Term Proposal Window	2/15/2016	In Service
Replace station equipment at Nelson, ESS H- 471 and Quad Cities; upgrade conductor ratings of Cordova - Nelson, Quad Cities - ESS H471 and ESS H-471 - Nelson 345 kV lines and mitigatw sag limitations	· · · · · · · · · · · · · · · · · · ·	2014/15 RTEP Long Term Proposal Window	10/15/2015	
Increase ratings of Peach Bottom 500/230 kV transformer to 1479 MVA normal/1839 MVA emergency		2014/15 RTEP Long Term Proposal Window	10/15/2015	

Approved Project	RIM Baseline ID Number(s)	PIM Market Efficiency Windows	PJM Board Approval Date	Project Status
Reconductor approximately 7 miles of the Woodville - Peters (Z-117) 138 kV circuit; reconfigure West Mifflin-USS Clairton(Z-15) 138 kV circuit to establish Dravosburg-USS Clairton(Z-14) 138 kV circuit and West Mifflin-Wilson(Z-15) 138 kV circuit; upgrade terminal equipment on Woodsville — Peters 138kV circuit (Structure 27A).	b2689.1, b2689.2, b2689.3	2014/15 RTEP Long Term Proposal Window	10/15/2015	Under Construction/I n Service
Rebuild Worcester - Ocean Pine 69 kV circuit No. 1 to 1400 Amp capability summer emergency rating	b2695	2014/15 RTEP Long Term Proposal Window	10/15/2015	In Service
Lincoln Substation: Upgrade the bus conductor and replace CTs.Germantown Substation: Replace 138/115 kV transformer with a 135/180/224 MVA bank. Replace Lincoln 115 kV breaker, install new 138 kV breaker, upgrade bus conductor and adjust/replace CTs. Carroll Substation: Replace the Germantown 138 kV wave trap, upgrade the bus conductor and adjust CT ratios.	b2688.1, b2688.2, b2688.3	2014/15 RTEP Long Term Proposal Window	10/15/2015	
Upgrade 138 kV substation equipment at Butler, Shanor Manor and Krendale substations. New rating of line will be 353 MVA summer normal/422 MVA emergency	b2696	2014/15 RTEP Long Term Proposal Window	10/15/2015	
Optimal Capacitors Configuration: New 175 MVAR 230 kV capacitor bank at Brambleton substation; new 175 MVAR 230 kV capacitor bank at Ashburn substation; new 300 MVAR 230 kV capacitor bank at Shelhorn substation; new 150 MVAR 230 kV capacitor bank at Liber	b2729	2014/15 RTEP Long Term Proposal Window	2/15/2016	
Upgrade capacity on E. Frankfort-University Park 345kV		2016/17 RTEP Long Term Proposal Window	10/18/2017	
Upgrade equipment at Pontiac Midpoint substation to increase capacity on Pontiac-Brokaw 345 kV line.		2016/17 RTEP Long Term Proposal Window	10/18/2017	
Reconductor the Conastone to Graceton 230 kV 2323 & 2324 circuits; Replace sevren disconnect switches at Conastone Substation; Add bundled conductor on the Graceton-Bagley-Raphael Road 2305 & 2313 230kV circuits; Replace short segment of conductor on the Windy Edge to Glenarm No, 110512 115kV circuit; Reconductor the Raphael Road - Northeast 2315 & 2337 230kV circuits		2016/17 RTEP Long Term Proposal Window	4/10/2018 ·	

Approved Project	PJM Baseline ID Number(s)	PJM Market Efficiency Windows	PJM Board Approval Date	Project Status
Upgrade terminal equipment at Tanners Creek 345kV station. Upgrade 345kV Bus and Risers at Tanners Creek for the Dearborn circuit.	b2976	2016/17 RTEP Long Term Proposal Window Addendum A	12/5/2017	

Supplemental Response: Please see the updated information in the table below.

Approved Project	PJM Baseline ID Number(s)	PJM Market Efficiency Windows	PJM Board Approval Date	Project Status
Install 2nd Hunterstown 230/115 kV transformer, Reconductor Hunterstown - Oxford 115 kV line, Replace the Hunterstown 115 kV breaker '96192' with 40 kA rated breaker	b2452, b2452.1, b2552.3	2013 Market Efficiency Proposal Window (Conducted prior to the implementation of Order No. 1000)	2/11/2014	In Service
Reconductor two spans of the Graceton - Safe Harbor 230 kV transmission line including termination point upgrades.	b2690	2014/15 RTEP Long Term Proposal Window	10/15/2015	Under construction; 10/2/2018 projected inservice date
Reconductor three spans limiting Brunner Island - Yorkana 230 kV line; add one breaker to Brunner Island switchyard; upgrade associated terminal equipment.	b2691	2014/15 RTEP Long Term Proposal Window	10/15/2015	In Service
Replace terminal equipment at AEP's Danville and East Danville substations to improve thermal capacity of Danville - East Danville 138 kV circuit	b2697.1, b2697.2	2014/15 RTEP Long Term Proposal Window	10/15/2015	Engineering phase; 6/1/2019 projected inservice date
Replace relays at AEP's Cloverdale and Jackson's Ferry substations to improve the thermal capacity of Cloverdale - Jackson's Ferry 765 kV line	b2698	2014/15 RTEP Long Term Proposal Window	10/15/2015	Engineering phase; 6/1/2019 projected inservice date

Approved Project	PJM Baseline ID Number(s)	PJM Market Efficiency Windows	PJM Board Approval Date	Project Status
Tap the Conemaugh - Hunterstown 500 kV line and build new 230 kV double circuit line between Rice and Ringgold. Build new 230 kV double circuit line between Furnace Run and Conastone. Rebuild of the Conastone - Northwest 230 kV line. Replace the Ringgold #3 and #4 transformers with 230/138 kV autotransformers Ringgold bus reconfiguration. Reconductor of Ringgold- Catoctin 138 kV. [Transource 9A project.]	b2743, b2752	2014/15 RTEP Long Term Proposal Window	8/2/2016	Engineering phase; 6/2/2020 projected inservice date
Replace L7915 B phase line trap at Wayne substation	b2693	2014/15 RTEP Long Term Proposal Window	10/15/2015	Engineering phase; 6/1/2019 projected inservice date
Mitigate sag limitations on Loretto - Wilton Center 345 kV Line and replace station conductor at Wilton Center	b2728	2014/15 RTEP Long Term Proposal Window	2/15/2016	In Service
Replace station equipment at Nelson, ESS H-471 and Quad Cities; upgrade conductor ratings of Cordova - Nelson, Quad Cities - ESS H-471 and ESS H-471 - Nelson 345 kV lines and mitigatw sag limitations	b2692.1, b2692.2	2014/15 RTEP Long Term Proposal Window	10/15/2015	Engineering phase; 6/1/2019 projected in- service date
Increase ratings of Peach Bottom 500/230 kV transformer to 1479 MVA normal/1839 MVA emergency	b2694	2014/15 RTEP Long Term Proposal Window	10/15/2015	Engineering phase; 6/1/2019 projected in- service date

Approved Project	PJM Baseline ID Number(s)	PJM Market Efficiency Windows	PJM Board Approval Date	Project Status
Reconductor approximately 7 miles of the Woodville - Peters (Z-117) 138 kV circuit; reconfigure West Mifflin-USS Clairton(Z-15) 138 kV circuit to establish Dravosburg-USS Clairton(Z-14) 138 kV circuit and West Mifflin-Wilson(Z-15) 138 kV circuit; upgrade terminal equipment on Woodsville — Peters 138kV circuit (Structure 27A).	b2689.1, b2689.2, b2689.3	2014/15 RTEP Long Term Proposal Window	10/15/2015	Under Construction; 11/30/2018 projected in- service date
Rebuild Worcester - Ocean Pine 69 kV circuit No. 1 to 1400 Amp capability summer emergency rating	b2695	2014/15 RTEP Long Term Proposal Window	10/15/2015	In Service
Lincoln Substation: Upgrade the bus conductor and replace CTs.Germantown Substation: Replace 138/115 kV transformer with a 135/180/224 MVA bank. Replace Lincoln 115 kV breaker, install new 138 kV breaker, upgrade bus conductor and adjust/replace CTs. Carroll Substation: Replace the Germantown 138 kV wave trap, upgrade the bus conductor and adjust CT ratios.	b2688.1, b2688.2, b2688.3	2014/15 RTEP Long Term Proposal Window	10/15/2015	Under Construction; 11/30/2018 projected in- service date
Upgrade 138 kV substation equipment at Butler, Shanor Manor and Krendale substations. New rating of line will be 353 MVA summer normal/422 MVA emergency	b2696	2014/15 RTEP Long Term Proposal Window	10/15/2015	Under construction; 6/24/2018 projected in- service date
Optimal Capacitors Configuration: New 175 MVAR 230 kV capacitor bank at Brambleton substation; new 175 MVAR 230 kV capacitor bank at Ashburn substation; new 300 MVAR 230 kV capacitor bank at Shelhorn substation; new 150 MVAR 230 kV capacitor bank at Liber	b2729	2014/15 RTEP Long Term Proposal Window	2/15/2016	Engineering phase; 12/1/2019 projected inservice date

Approved Project	PJM Baseline ID Number(s)	PJM Market Efficiency Windows	PJM Board Approval Date	Project Status
Upgrade capacity on E. Frankford-University Park 345kV	b2930	2016/17 RTEP Long Term Proposal Window	10/18/2017	On hold pending a RTEP network upgrade project.
Upgrade equipment at Pontiac Midpoint substation to increase capacity on Pontiac-Brokaw 345 kV line.	b2931	2016/17 RTEP Long Term Proposal Window	10/18/2017	Engineering phase; 6/1/2021 projected inservice date
Reconductor the Conastone to Graceton 230 kV 2323 & 2324 circuits; Replace sevren disconnect switches at Conastone Substation; Add bundled conductor on the Graceton-Bagley-Raphael Road 2305 & 2313 230kV circuits; Replace short segment of conductor on the Windy Edge to Glenarm No. 110512 115kV circuit; Reconductor the Raphael Road - Northeast 2315 & 2337 230kV circuits	b2992.1, b2992.2, b2992.3, b2992.4	2016/17 RTEP Long Term Proposal Window	4/10/2018	Engineering phase; 6/1/2021 projected inservice date
Upgrade terminal equipment at Tanners Creek 345kV station. Upgrade 345kV Bus and Risers at Tanners Creek for the Dearborn circuit.	b2976	2016/17 RTEP Long Term Proposal Window Addendum A	12/5/2017	Engineering phase; 6/1/2021 projected inservice date

Interrogatories of Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01-31:

Identify the origin of the lower-priced energy that is prevented from "flowing freely" on the grid, as referenced by Mr. Ali at P. 6.

Response:

Please refer to the Company's response to STFC 1-32. Please also refer to the Company's response to STFC 1-26.

Supplemental Response:

Please see the Company's response to OCA XVIII question 21 and OCA XXI question 1.

Witness: Paul F. McGlynn

Interrogatories of Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01-33:

Identify each and every "congested facility" that the proposals 2014/15 RTEP Long Term Proposal Window addressed, as referenced in Mr. Ali's Statement, p. 7, lines 7-8.

Response:

The Company notes that the information requested, other than the information related to PJM's market efficiency analysis that determined that Project 9A is needed as a market efficiency project in PJM's RTEP, bears no relationship with Project 9A. The Company further notes that the information requested contains Critical Energy Infrastructure Information ("CEII") that is Confidential and Highly Sensitive. Upon further request, the information will be made available for review, subject to and consistent with the protective order in this case and applicable licensing requirements; the Company notes, however, that the information requested is not relevant to the Company's application.

Please refer also to the publicly-available information in the November 2014 TEAC slides, available at the following link: [http://pjm.com/-/media/committees-groups/committees/teac/20141111/20141111-market-efficiency-update.ashx], referring to transmission system congestion constraints in the PJM system for which PJM sought market efficiency project proposals consistent with FERC Order 1000. Please refer to Slide 9 for information specific to the AP South Reactive Interface that Project 9A addresses.

Supplemental Information:

The slides referenced in the original response are responsive to this request.

Witness: Paul F. McGlynn and Kamran Ali

Interrogatories of Stop Transource in Franklin County Set 1 (Supplemental Responses dated 7/27/2018)

Data Request STFC-01-35:

Identify each and every time that the proposed Route was unable to use parallel alignments along existing utility rights —of—way or other infrastructure, such as roadways and railroads, as discussed by Mr. Baker on P. 9.

Response:

Please refer to the IEC West Siting Study for a discussion of the existing corridors that were analyzed during the siting process.

Supplemental Response:

A primary siting guideline used to evaluate potential transmission line development opportunities is to assess options to parallel existing linear utility (e.g., electric or gas) and transportation (e.g., highway or railroad) rights of way. This guideline for the Rice-Ringgold 230 kV Transmission Line Project was noted in **Section 2.4** (Siting Guidelines; p.8) of the IEC (WEST) Siting Study, which specifically states "Consider parallel alignments along existing utility ROWs or other infrastructure, such as roadways and railroads." The use of roadways as linear features that could potentially be paralleled focused on major interstates and highways, which exhibit relatively direct alignments across the landscape. Although smaller local, county, and state roadways may potentially represent a linear opportunity they are often not practicable due to their generally convoluted alignments, the density of residential or commercial development that borders these roadways, the extent of existing local utility networks bordering the roadways, and potential permitting issues related to safety zone set-backs along state roadways.

Paralleling existing linear features may be advantageous in providing opportunities to minimize potential social and environmental impacts. However, there are often constraints associated with the surrounding land use that may limit the extent to which the potential alignment can follow these features. In many instances these constraints may ultimately make paralleling these features more impactful. This limitation is discussed in **Section 3.3** (Constraints and Opportunities; p. 15) of the Siting Study, which states "However, the benefits of these opportunity features have to be considered with respect to area land use and other associated effects. For example, if a parallel alignment requires frequent crossing of the existing line to avoid adjacent constraints, then additional aesthetic impacts from many tall crossing structures would need to be considered, as well as the potential for operational and construction impacts associated with outage planning, construction, and maintenance activities. Similarly, while paralleling roads may reduce fragmentation impacts in a heavily forested area, it may also place the line in closer proximity to houses along the road."

As part of the transmission line siting review process in Franklin County, Pennsylvania, the IEC Siting Team initially identified several Conceptual Routes between the Rice and Ringgold Substations that avoided large area constraints (e.g., high density residential development, military facilities, and airports) and incorporated notable opportunity features. This process is discussed in Section 3.4 (Conceptual Route Development; p15-16) of the Siting Study, which noted "Specific Conceptual Routes identified in the Project Study Area included paralleling Interstate-81 (I-81), regional railroad alignments (e.g., CSX Lurgan Subdivision), local utility corridors such as the Fayetteville-West Waynesboro 138 kV line, as well as traversing the forested slopes of South Mountain." The use of these Conceptual Routes in the potential identification of Study Segments is further discussed in Section 3.5.3 (Study Segment Development; p. 17) of the Siting Study, which notes that "Opportunity corridors identified in the Project Study Area included roads (e.g., I-81 and U.S. Route 11), railroads, (such as the Norfolk Southern railroad line that parallels I-81 and several other local rail lines), as well as a number of transmission line corridors (most of which have a generally north-south alignment). Opportunities to use the undeveloped lands along South Mountain were also evaluated. Development of the Study Segments initially focused on any potential conceptual alignments that could parallel these existing infrastructure features or use areas of undeveloped land."

The opportunities and constraints of the specific Conceptual Routes that parallel existing linear features are discussed in detail in **Section 3.5.3** (Study Segment Development; p. 18) of the Siting Study, which notes "Study Segments were developed parallel to I-81 north of Chambersburg where agricultural lands were located adjacent to the highway, however, concentrated development near Scotland and Chambersburg resulted in several alignment shifts away from the highway edge. Opportunities to parallel I-81 south of Chambersburg were also limited due to adjacent development and because the highway continues to travel further to the southwest and away from the Ringgold Substation area. Assessment of U.S. Route 11 noted no paralleling opportunity due to the variable residential and commercial development along this roadway.

Similar to I-81, the Norfolk Southern railroad offered a few opportunities north of Chambersburg where short Study Segments could be developed, however, the dense development adjacent to the rail corridor limited the length of these alignments. A few local railroad lines south of Chambersburg, specifically the CSX Lurgan Subdivision line, provided more opportunities for parallel alignments. However, many of these railroad alignments were also bordered in certain areas by concentrated residential and commercial structures, especially at road crossings. This resulted in several diversions from parallel alignments to avoid these areas.

The existing transmission line network within the Project Study Area provided several opportunities for paralleling, but most opportunities were limited in length due to the general orientation of the transmission line and the extent of development in the area. North of Chambersburg and west of I-81, residential and commercial development has been built up to the edge of the existing transmission lines and approved planned development in the surrounding open fields limited options to divert from paralleling the existing transmission line alignment in many of these areas. As with the railroads, opportunities were identified south of Chambersburg to parallel longer sections of the transmission line system, specifically the FE Ringgold-West Waynesboro and FE Fayetteville-West Waynesboro transmission lines. Similarly, alignment shifts to bypass developed areas were necessary in several locations."

As noted in these discussions, the options to parallel any specific linear feature in entirety from the Rice Substation to the Ringgold Substation was found to be impracticable due to either the overall direction of the feature alignment or the extent of social development adjacent to the feature. In many cases, avoiding the developed areas adjacent to these linear features may have resulted in even more social and environmental impacts due to the longer alignment that would have been required. Although specific transmission line alignments evaluated during the Siting Study (e.g., FE Ringgold-West Waynesboro and FE Fayetteville-West Waynesboro) were prominent in the identification of the Proposed Route alignment, they only provided a portion of the alignment as they did not offer direct linkage between the two required endpoints.

For these reasons, the IEC Siting Team identified Study Segments that extended across the landscape of the study area with the prospect of providing direct connectivity between sections of the linear features that could be paralleled. To evaluate all possible alignments within the study area, other cross-country Study Segments were identified that used opportunities of crossing open lands to the west of Chambersburg and the forested lands of Michaux State Forest on the eastern side of the study area. Several of the linear and cross-country alignments were eliminated during the open house review and IEC Siting Team analysis process that narrowed the numerous Study Segments (see **Figure 5**; p.21) down to the three Alternative Routes that were further evaluated (see **Figure 6**; p.29) in the Siting Study.

Through the process described in **Section 4.0** (Alternative Route Comparison; p. 30), the IEC Siting Team provided the rationale for the identification of Alternative Route C as the Proposed Route for the project. Details of the 28.8 mile alignment of the Proposed Route are provided in **Section 3.6.3** (Alternative Route C (28.8 miles); p. 26), which describes the sections paralleling existing linear features that include:

- Interstate-81.
- FE Letterkenny-Grand Point 138 kV Transmission Line which becomes the FE Grand Point-Allegheny Energy 138 kV Transmission Line,
- FE Fayetteville-West Waynesboro 138 kV Transmission Line,
- FE Antrim-West Waynesboro 69 kV Transmission Line,
- FE Ringgold-West Waynesboro 138 kV Transmission Line, and
- FE Reid-Ringgold 138 kV Transmission Line.

At the request of Stop Transource Franklin County (STFC), the following provides a further summary of the specific sections where the Proposed Route was unable to use parallel alignments along existing utility and transportation rights of way. Using Alternative Route C (Proposed Route) description provided in **Section 3.6.3** (p. 26-28) as a guide, these specific sections are noted and discussed as bolded subheadings. Please see STFC 01-35 Attachment 1 for a map of the areas referenced.

- The Proposed Route exits the Rice Substation from the southwest corner and heads south, paralleling the east side of I-81 and spanning along the edge of agricultural fields for approximately 2.2 miles; along this stretch the Proposed Route crosses a stream, Mountain Run.
- The Proposed Route turns sharply east to cross SR 696 perpendicularly and travels approximately 0.6 mile to the east-southeast through an agricultural field before turning sharply to the southwest.
 - O Paralleling the east side of Interstate-81 was not feasible from this point south due to the presence of commercial structures at the Interstate-81 and Route 997 intersection that includes a gas station, a hotel, a restaurant, and two large stores. These commercial areas are further bordered to the east by

a residential neighborhood. Options to the west side of Interstate-81 are constrained by more residential development (see Box 1 on STFC 01-35 Attachment 1).

- Travelling southwest for 0.7 mile, the Proposed Route crosses a stream, Phillaman Run, and then crosses Black Gap Road (SR 997) in a perpendicular fashion. The Proposed Route traverses for 0.6 mile around the perimeter of the Chambersburg Mall, generally following the outer edge of the parking lot on the northern and eastern sides of the mall, and then heading west to parallel with I-81 again.
- After reaching the eastern side of I-81, the Proposed Route turns sharply south, and parallels the interstate for approximately 1.4 miles and at this location I-81 and the route generally travel in a western direction. Along this section, the Proposed Route traverses the edge of agricultural fields and crosses a stream and the Conococheague Creek.
- The Proposed Route turns sharply to the southwest and travels 0.4 until it reaches the existing FE Letterkenny-Grand Point 138 kV transmission line. The route stays to the east of this system and parallels it south for approximately 1.6 miles toward U.S. Route 30, spanning along agricultural fields, around the Grand Point Substation, and over Walker Road. The Lost Acres Airport is located approximately 0.6 mile west of the route.
 - The alignment of the Proposed Route deviates away from the existing FE Letterkenny-Grand Point 138 kV Transmission Line to bypass around the Grand Point Substation, which cannot be spanned (Box 2 on STFC 01-35 Attachment 1).
- Prior to crossing commercially lined U.S. Route 30, the Proposed Route first crosses over to the west side of the transmission line, which is now the FE Grand Point-Allegheny Energy 138 kV line, and then spans the highway. The route turns sharply west and then south for 0.5 miles spanning across a parking lot and bypassing around a commercial building. After going around the building, the route again parallels the FE Grand Point-Allegheny Energy 138 kV line for 0.5 mile.
 - O The alignment of the Proposed Route deviates from the existing FE Grand Point-Allegheny Energy 138 kV Transmission Line on the south side of U.S. Route 30 due to the limited spacing between two large commercial buildings that were built on either side of the existing transmission line (Box 3 on STFC 01-35 Attachment 1).
- The Proposed Route deviates from the transmission line corridor for 1.1 mile to bypass around homes along the line. Along this section, the route extends to the southwest and spans a stream, Falling Spring Branch, crosses Falling Spring Road, and traverses through a forested area where homes are present to the east. Within the forest, the route turns south, travels across an agricultural field and spans the FE Grand Point-Allegheny Energy 138 kV line near Henry Lane.
- After crossing this road, the Proposed Route extends to the southeast for approximately 4.6 miles over agricultural fields to Yohe Road, where it intersects with the FE

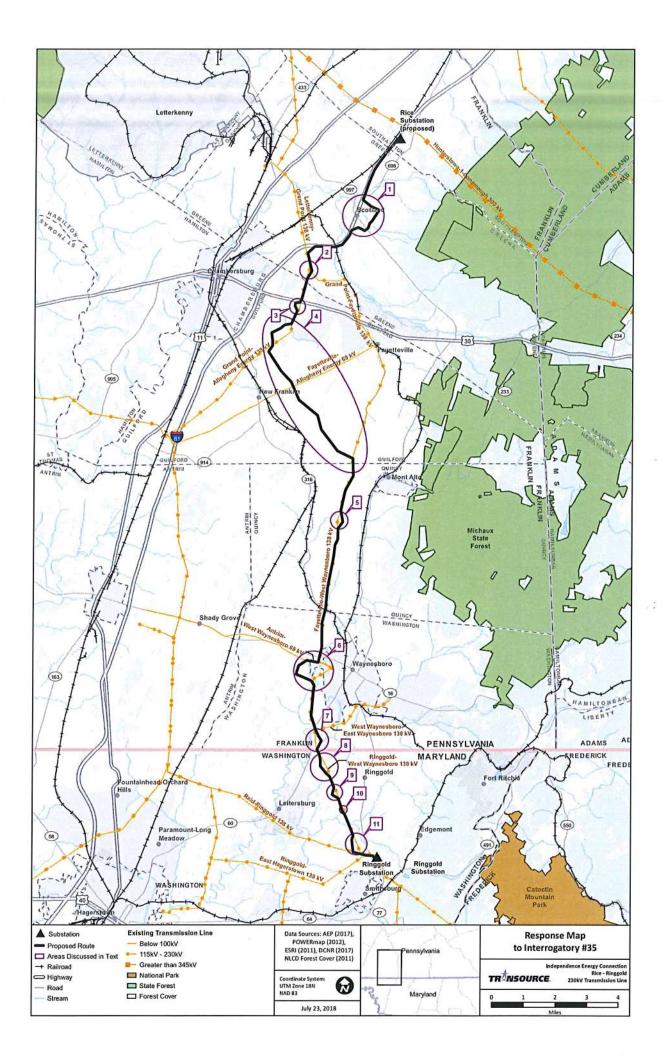
Fayetteville-West Waynesboro 138 kV transmission line. This section involves crossing three streams, several local roadways, and the FE Fayetteville-Allegheny 69 kV line.

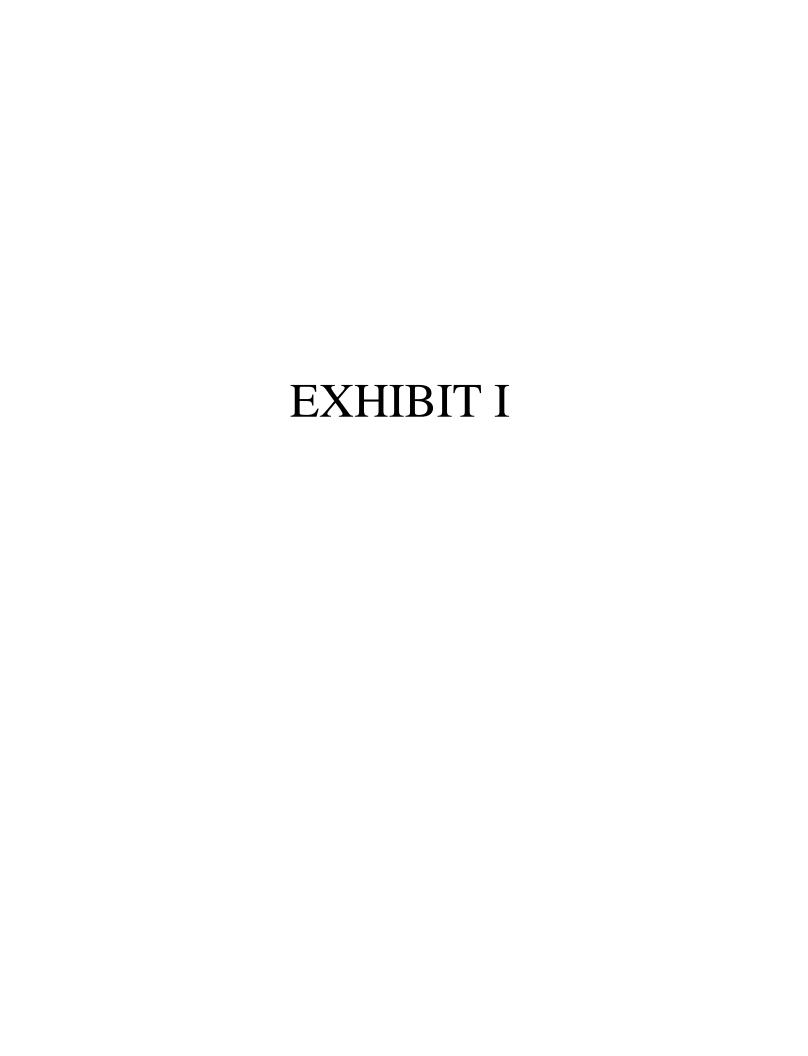
- The alignment of the Proposed Route deviates from the existing FE Grand Point-Allegheny Energy 138 kV Transmission Line north of Falling Springs Road due to the presence of a residential structure. Further opportunities to parallel this linear feature are not practicable due to additional residential constraints south of Falling Springs Road and due the southwesterly alignment of this existing transmission line that directs it away from the southeasterly alignment toward the Ringgold Substation. At this point, the Proposed Route extends for 4.6 mile across the open landscape to Yoho Road where it intersects with the existing FE Fayetteville-West Waynesboro 138 kV Transmission Line, which the Proposed Route follows to the south. Opportunities to parallel the FE Fayetteville-West Waynesboro 138 kV Transmission Line to the north toward the Rice Substation were reviewed, but removed from further assessment due the presence of a large township park (Norlo Park) that would be bisected by the Proposed Route and the high density residential development around U.S. Route 30 that did not allow for developing any alignment through this area. The Proposed Route does span over the existing FE Fayetteville-Allegheny 69 kV Transmission Line near Newcomer Road, but paralleling this utility right of way is impracticable as it extends in a northeast to southwest direction and not toward the Ringgold Substation (Box 4 on STFC 01-35 Attachment 1).
- As the Proposed Route crosses Yohe Road, it also spans to the east side of the FE Fayetteville-West Waynesboro 138 kV transmission line and then turns sharply to the south to parallel this existing line for approximately 1.7 mile; a stream is crossed in this section, as is Stamey Hill Road.
- A 0.6 mile deviation from the colocation is required in the vicinity of the Manheim Road crossing due residential development that has built up adjacent to the transmission line and the route then parallels the existing line for 0.5 miles on the eastern side.
 - O Paralleling the FE Fayetteville-West Waynesboro 138 kV Transmission Line was not feasible at the Manheim Road intersection due to residential development on the east and west sides of the line and the presence of a distribution substation on the south side of Manheim Road. Other minor deviations away from the line were incorporated to avoid farm structures (Box 5 on STFC 01-35 Attachment 1).
- At Hess Benedict Road, the Proposed Route crosses over to the west side of the FE Fayetteville-West Waynesboro 138 kV transmission line to avoid agricultural and residential structures. The route parallels the line for another 3.7 miles, traversing agricultural fields, crossing Orphanage Road, Wayne Highway (SR 316), and Buchanan Trail East (SR 16), as well as a stream.

- After crossing SR 16 and spanning the FE Antrim-West Waynesboro 69 kV lines, the Proposed Route turns sharply to the west and parallels this line for approximately 0.4 mile. This stretch includes a crossing of Cold Springs Road and a stream.
 - The alignment of the Proposed Route deviates from paralleling linear transmission line features at this point as these features extend in an east-to-west fashion on the south side of SR 16. Alternatives to reach another transmission line alignment to the south (FE Ringgold-West Waynesboro 138 kV Transmission Line) were constrained by an approved development plan for a large retirement community in this section of West Waynesboro and existing residential development along Cold Springs Road. Alternatives to the east were impractical as they would extend into more densely developed sections of Waynesboro. A 1.2 mile alignment to the west using open lands was identified as the least impactful option (Box 6 on STFC 01-35 Attachment 1).
- Turning to the south and then east, the Proposed Route extends for 1.2 miles to Marsh Road. The route traverses an agricultural field to avoid agricultural and residential structures, and crosses a stream, the FE Reid-West Waynesboro 69 kV line, and the FE Ringgold-West Waynesboro 138 kV line.
- After crossing Marsh Road and a stream, the Proposed Route turns sharply south to parallel the east side of the FE Ringgold-West Waynesboro 138 kV line for 2.1 miles. The Proposed Route crosses agricultural fields, Hagerstown Road (SR 316), the FE West Waynesboro-East Waynesboro 138 kV line, and the West Branch Antietam Creek along this stretch. The route extends away from the transmission line corridor to avoid residential structures near the southern end of this section prior to crossing Lyons Road.
 - o Paralleling the FE Ringgold-West Waynesboro 138 kV Transmission Line was not feasible at the Lyons Road intersection due to residential development on the east and west sides of the line (Box 7 on STFC 01-35 Attachment 1).
- Spanning to the west side of the FE Ringgold-West Waynesboro 138 kV line, the Proposed Route turns south and crosses the Pennsylvania/Maryland state line. The route generally parallels the transmission line for approximately 2.6 miles until it intersects with Gardenhour Road. Some deviations are required along this stretch to avoid agricultural operations and structures. The route in this section crosses Rocky Forge Road, Ringgold Pike (SR 418), Poplar Grove Road, and Newcomer Road, as well as numerous crossings of various tributaries to Little Antietam Creek.
 - A deviation away from the FE Ringgold-West Waynesboro 138 kV Transmission Line near Rocky Forge Road was incorporated at the request of the landowner to minimize impacts on farming operations (Box 8 on STFC 01-35 Attachment 1).
 - A deviation away from the FE Ringgold-West Waynesboro 138 kV
 Transmission Line north of Poplar Grove Road was incorporated to avoid

- residential and farm structures located adjacent to the existing line (Box 9 on STFC 01-35 Attachment 1).
- A deviation away from the FE Ringgold-West Waynesboro 138 kV Transmission Line south of Poplar Grove Road was incorporated to avoid a farm structure located adjacent to the existing line (Box 10 on STFC 01-35 Attachment 1).
- The Proposed Route crosses Gardenhour Road paralleling the existing transmission line for 0.4 miles and traverses through an orchard.
- The Proposed Route extends out for 0.6 mile to the southwest from the transmission line to bypasses around residential structures along Rowe Road and traverses agricultural lands before spanning over to the south side of the FE Reid-Ringgold 138 kV transmission line.
 - O A deviation away from the FE Ringgold-West Waynesboro 138 kV Transmission Line at the Rowe Road crossing was incorporated to avoid residential and farm structures located adjacent to the existing line (Box 11 on STFC 01-35 Attachment 1).
- The Proposed Route turns east for 0.8 mile and extends into the southeastern corner of the Ringgold Substation, spanning the FE Ringgold-East Hagerstown 138 kV transmission line and Smithsburg Pike (MD 64) along the alignment.

Of the three alternative routes identified and assessed for the Siting Study, the Proposed Route parallels the longest combination of linear features as illustrated in **Table 10** (Constructability Evaluation Criteria; p. 95). This summary notes that of the 28.8 mile length of the Proposed Route, 12.1 miles (42%) of the alignment is located along existing highways or transmission line right of ways.





From: Everard, Robert
To: Laurie M Spears

Subject: [EXTERNAL] Fwd: RE: PHMC CRGIS disclaimer Date: Thursday, May 03, 2018 1:47:51 PM

Attachments: image001.png

This is an EXTERNAL email. STOP. THINK before you CLICK links or OPEN attachments. If suspicious please forward to incidents@aep.com for review.

Here some more....

Sent from my iPhone

Begin forwarded message:

From: "Gottsfield, Andrew" < agottsfield@burnsmcd.com >

Date: May 3, 2018 at 1:14:36 PM EDT

To: "Fulmer, John" < ifulmer@burnsmcd.com >, "Everard, Robert"

<reverard@burnsmcd.com>

Cc: "Harris, Brandy M" < bmharris@burnsmcd.com>

Subject: RE:

This is the terms and conditions for CRGIS

See 2 a in red below....

"User agrees that it will not post or distribute the COMMONWEALTH PROPERTY online in a data warehouse or post the COMMONWEALTH PROPERTY anywhere without the express written permission of the Commonwealth."

TERMS AND CONDITIONS

 System Description. Cultural Resource Geographic Information System (CRGIS) is an electronic map-based inventory of Pennsylvania's historic and archaeological sites and surveys maintained by the Pennsylvania Historical and Museum Commission (PHMC). The CRGIS contains information on approximately 20,000 archaeological sites and 113,000 historic properties ("System"). Access to archaeological site information is confidential and only available to cultural resource professionals who meet the <u>Secretary of the</u> <u>Interior's Professional Qualification Standards</u> with a specialty in prehistoric, historic and/or under water archaeology or geomorphology. 2. License. You ("User") acknowledge that the information contained within this site shall remain the exclusive intellectual property of the Commonwealth of Pennsylvania, acting through the Pennsylvania Department of Transportation (PennDOT) and the Pennsylvania Historical and Museum Commission (PHMC) (collectively the "COMMONWEALTH"). The Commonwealth grants to User a non-exclusive and non-transferable limited license to access the historic properties and survey information ("COMMONWEALTH PROPERTY") contained within the site. Please be advised that the Commonwealth reserves the right to charge a fee for access to Commonwealth Property contained in this System. However, Users will be notified in advance of any such change.

The right to electronically access and display COMMONWEALTH PROPERTY retrieved from the System is subject to the following terms and conditions:

a. Restrictions. The COMMONWEALTH PROPERTY contains copyrighted material, trade secrets, and other proprietary material owned by the Commonwealth. To protect the Commonwealth, User acknowledges and agrees that the COMMONWEALTH PROPERTY is proprietary and may not be modified, sold, sublicensed, or distributed in any way, and may not be used to create derivative works based upon the COMMONWEALTH PROPERTY. User also agrees that he or she will not decompile, reverse engineer or decode the System, in whole or in part.

User agrees that it will not post or distribute the COMMONWEALTH PROPERTY online in a data warehouse or post the COMMONWEALTH PROPERTY anywhere without the express written permission of the Commonwealth.

User further agrees to guard the COMMONWEALTH PROPERTY with the same diligence with which it guards its own proprietary information.

Except as provided herein, User may not use the COMMONWEALTH PROPERTY or retrieve COMMONWEALTH PROPERTY from the System in any fashion that infringes the copyrights or other interests therein. In addition, USER may not use or intermix COMMONWEALTH PROPERTY with any third party's intellectual property.

User may not remove or obscure the copyright notice or other notices contained in or retrieved from the System.

User shall cite to the Pennsylvania Historical and Museum Commission's Cultural Resource Geographic Information System (CRGIS) as a source of site information when using data from CRGIS in any publication, report or presentation.

As stated in the Data Quality Statement below, sites viewed in the System may not include precise boundaries because of various sources

- of mapped data. Therefore, User agrees not to use site boundary information for engineering purposes without field verification.
- Access to the System. COMMONWEALTH PROPERTY and features may be added or withdrawn from the System or otherwise changed without notice.
- c. Indemnification. User shall indemnify, hold harmless, and defend (if requested) the Commonwealth, PennDOT and the PHMC and all of their officers, agents, employees, from and against any and all claims, demands, suits, losses, damages, actions or fees (including attorneys' fees) of any kind whatever, character, name or description caused by, in connection with, resulting from or arising out of User's access to and use of the System.
- d. No Warranties. The Commonwealth makes no warranties that User's access to use of the COMMONWEALTH PROPERTY will be error free or successful. The Commonwealth makes and User receives no warranty, express or implied, and there are expressly excluded all warranties of merchantability and fitness for a particular purpose.
- e. Choice of Laws. This license shall be governed by and construed in accordance with the laws of the Commonwealth of Pennsylvania and with the intellectual property laws of the United States of America.
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- g. Miscellaneous. These terms and conditions may be changed from time to time by the COMMONWEALTH and shall become effective immediately upon written or electronic notice to User. User's access may be terminated immediately upon notice to the COMMONWEALTH that the User does not accept the changes. The COMMONWEALTH may also terminate User's access to the System for breach of this Agreement or suspend or discontinue providing access to the System to User without notice and pursue any other remedy legally available to enforce compliance with any of User's obligations hereunder.

Except as otherwise provided herein, all notices and other communications are deemed to have been properly given to User if provided electronically or in writing deposited in the U.S. mail.

The failure of the COMMONWEALTH to enforce any provision hereof shall not constitute or be construed as a waiver of the COMMONWEALTH'S right to enforce it at a later time.

The User may not assign his or her rights or delegate use of his or her

User ID and password to the System without the prior written consent of the COMMONWEALTH.

TABLE OF CONTENTS

TITLE 37 HISTORICAL AND MUSEUMS

Chapter 1. General Provisions

- § 101. Short title of title.
- § 102. Declaration of policy.
- § 103. Definitions.
- § 104. Pennsylvania Historical and Museum Commission.

Chapter 3. Powers and Duties of Pennsylvania Historical and Museum Commission

- § 301. General powers and duties.
- § 302. Specific powers and duties.
- § 303. Sites.
- § 304. Personal property.
- § 305. Documents.
- § 306. Publications and reproductions.
- § 307. Qualified historical and archaeological societies.

Chapter 5. Historic Preservation

- § 501. Short title of chapter.
- § 502. Powers and duties of commission.
- § 503. Inclusion of property on register.
- § 504. Historic Preservation Board.
- § 505. Powers and duties of board.
- § 506. Archaeological field investigations on Commonwealth land.
- § 507. Cooperation by public officials with the commission.
- § 508. Interagency cooperation.
- § 509. Transfer of Commonwealth land involving historic resources.
- § 510. Approval of construction affecting historic resources.
- § 511. Criminal penalties.
- § 512. Enforcement of historic preservation laws and policies.

Chapter 7. Historic Properties

- § 701. Title to historic property.
- § 702. Powers over certain historic property.
- § 703. Brandywine Battlefield (Repealed).
- § 704. Washington Crossing (Repealed).
- § 705. United States Brig Niagara.

Chapter 9. Concurrent Jurisdiction

- § 901. Cession of concurrent jurisdiction.
- § 902. Sites affected.
- § 903. Transfer of personal property.
- § 904. Acceptance by United States.
- § 905. Acceptance by Governor.
- § 906. Police service agreements.

TITLE 37 HISTORICAL AND MUSEUMS

Chapter

- 1. General Provisions
- 3. Powers and Duties of Pennsylvania Historical and Museum

Commission

- 5. Historic Preservation
- 7. Historic Properties
- 9. Concurrent Jurisdiction

<u>Enactment.</u> Unless otherwise noted, the provisions of Title 37 were added May 26, 1988, P.L.414, No.72, effective immediately.

CHAPTER 1 GENERAL PROVISIONS

Sec.

- 101. Short title of title.
- 102. Declaration of policy.
- 103. Definitions.
- 104. Pennsylvania Historical and Museum Commission.

Enactment. Chapter 1 was added May 26, 1988, P.L.414, No.72, effective immediately.

§ 101. Short title of title.

This title shall be known and may be cited as the History Code.

§ 102. Declaration of policy.

It is hereby determined and declared as a matter of legislative finding and policy that:

- (1) Section 27 of Article I of the Constitution of Pennsylvania makes the Commonwealth trustee for the preservation of the historic values of the environment.
- (2) The conservation of Pennsylvania's historic and natural heritage and the preservation of public records, historic documents and objects of historic interest, and the identification, restoration and preservation of architecturally and historically significant sites and structures are duties vested primarily in the Pennsylvania Historical and Museum Commission.
- (3) The irreplaceable historical, architectural, archaeological and cultural heritage of this Commonwealth should be preserved and protected for the benefit of all the people, including future generations.
- (4) The preservation and protection of historic resources in this Commonwealth promotes the public health, prosperity and general welfare.
- (5) The rapid social and economic development of our contemporary society threatens to destroy the remaining vestiges of our historic heritage.
- (6) It is in the public interest for the Commonwealth, its citizens and its political subdivisions to engage in comprehensive programs of historic preservation for the enjoyment, education and inspiration of all the people, including future generations.

§ 103. Definitions.

Subject to additional definitions contained in subsequent provisions of this title which are applicable to specific provisions of this title, the following words and phrases when used in this title shall have the meanings given to them in this section unless the context clearly indicates otherwise:

"Archaeological field investigation." Extensive controlled excavation of an archaeological site to study the cultural history using professionally accepted means of sampling, removing and excavating archaeological specimens, also known as phase three archaeological research or data recovery.

"Archaeological specimens." All artifacts, remains, objects or any other evidence of historic, prehistoric or anthropological value, whether found above or below the surface of the earth.

"Archaeological survey." A visual inspection and limited sampling and excavation of an archaeological site to determine the characteristics and physical extent of a site, also known as phase one or phase two archaeological research.

"Commission." The Pennsylvania Historical and Museum Commission of the Commonwealth.

"Executive director." The executive director of the commission.

"Historic preservation." The research, restoration, rehabilitation and other activities furthering the protection, enhancement, preservation or enjoyment of historic resources.

"Historic property." Any historical building, ground, monument or cultural remain committed by statute to the custody of the commission.

"Historic resource." A building, structure, object, district, place, site or area significant in the history, architecture, maritime heritage, archaeology or culture of this Commonwealth, its communities or the nation.

"Pennsylvania Register of Historic Places." A selected inventory of historic resources determined by the commission to be significant in the history, architecture, archaeology or culture of this Commonwealth, its communities or the nation.

"Private historical organization." An organization constituted to engage in professional or nonprofessional activities within the disciplines of history, archaeology, museum management, natural history, the arts or historic preservation on an academic, scholarly or popular basis.

"Public officials." Officers, agents and employees of the Federal Government, Commonwealth of Pennsylvania, or any of its political subdivisions.

"Qualified historical or archaeological society." A private historical or archaeological organization or other historical society which satisfies the requirements provided in section 307 (relating to qualified historical and archaeological societies).

"Significant archaeological site." An area of land which contains extensive evidence of previous prehistoric or historic human habitation or stratified deposits of animal or plant remains or manmade artifacts or human burials.

(Nov. 28, 1995, P.L.647, No.70, eff. 60 days)

1995 Amendment. Act 70 amended the def. of "archaeological field investigation" and added the defs. of "archaeological survey" and "significant archaeological site."

§ 104. Pennsylvania Historical and Museum Commission.

- (a) Membership.--The Pennsylvania Historical and Museum Commission shall consist of the Secretary of Education, or his designee; nine residents of this Commonwealth appointed by the Governor with the advice and consent of a majority of the members elected to the Senate; and four members of the General Assembly, or their designees, two from the Senate, one of whom shall be appointed by the President pro tempore and one by the Minority Leader, and two from the House of Representatives, one of whom shall be appointed by the Speaker and one by the Minority Leader.
- (b) Term of office.--A member appointed from the General Assembly shall serve for a term to expire with his concurrent term as a legislator and shall serve until a successor is appointed and qualified, unless he is not elected for the next succeeding term as a member of the General Assembly, in which case a vacancy shall occur. Members other than the members of the General Assembly shall serve for a term of four years and shall serve until a successor is appointed and qualified.
- (c) Chairman.--One of the members shall be designated by the Governor to serve as chairman of the commission.
 - (d) Quorum.--Eight members shall constitute a quorum.
- (e) Attendance at meetings.--A member who fails to attend three consecutive meetings shall forfeit his seat unless the chairman of the commission, upon written request from the member, finds that the member should be excused from a meeting because of illness or the death of an immediate family member.
- (f) Public hearings.--The commission shall hold public hearings in various locations throughout this Commonwealth at such places and times as it may deem appropriate.
- (g) Executive director.--The commission shall appoint an executive director who shall attend to the administrative work of the commission. The executive director shall serve at the pleasure of the commission, which shall fix his compensation, subject to the approval of the Governor. No member of the commission or person who has served as a member of the commission within one year shall be eligible for appointment as executive director.
- (h) Historical Preservation Fund.--The money collected by the commission from all fees, sales and other activities shall be paid into the State Treasury through the Department of Revenue and credited to the Historical Preservation Fund. Collections shall include the proceeds from the sale of historic properties. The money in the fund may be used by the commission and is hereby appropriated to it in exercising its powers and performing its duties as set forth in this title.

(Nov. 28, 1995, P.L.647, No.70, eff. imd.; Dec. 9, 2002, P.L.1395, No.173, eff. imd.)

2002 Amendment. Act 173 amended subsec. (h).

1995 Amendment. Act 70 amended subsec. (a).

<u>Termination of Commission.</u> The Pennsylvania Historical and Museum Commission is subject to periodic review under the act of December 22, 1981 (P.L.508, No.142), known as the Sunset Act, and will terminate on the date specified in that act unless reestablished or continued by the General Assembly. The Pennsylvania Historical and Museum Commission was reestablished by the act of May 26, 1988 (P.L.414, No.72), until December 31, 1997. The termination date of December 31, 1997, is probably not effective since the Sunset Act expired December 22, 1991.

CHAPTER 3 POWERS AND DUTIES OF PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

Sec.

- 301. General powers and duties.
- 302. Specific powers and duties.
- 303. Sites.
- 304. Personal property.
- 305. Documents.
- 306. Publications and reproductions.
- 307. Qualified historical and archaeological societies.

Enactment. Chapter 3 was added May 26, 1988, P.L.414, No.72, effective immediately.

Cross References. Chapter 3 is referred to in section 502 of this title.

§ 301. General powers and duties.

The commission shall have the power and duty to:

- (1) Serve as the official agency of the Commonwealth for the conservation of Pennsylvania's cultural heritage.
- (2) Preserve public records, historical documents and objects of historical interest, possession and control of which have been transferred to the commission.
- (3) Initiate, encourage, support and coordinate and carry out historic preservation efforts in this Commonwealth.
 - (4) Provide for historical research and interpretation and public access to this heritage.
- (5) Sell to the public any publications that are published by any department, board, commission or officer of the Commonwealth.

(Dec. 9, 2002, P.L.1395, No.173, eff. imd.)

§ 302. Specific powers and duties.

The commission shall have the power and duty to:

- (1) Pecuniary gifts.--Accept, on behalf of the Commonwealth, gifts and bequests, including securities, for the endowment of its work in accordance with the instructions of the donors and in conjunction with the Governor and State Treasurer, who shall, together with the members of the commission, constitute a body of trustees for the care of these funds. These trustees shall invest the funds in bonds of the Commonwealth or any of its political subdivisions and employ the interest and income from these investments for the purposes of the commission or apply these funds to the uses specified by the respective donors of the funds. Any donor of money or other property may specify that the donation shall be held in the form acquired, or shall be invested in or converted into some other specific property or class of investment, in which case the trustees shall be relieved of all liability which may result from the imprudent investment of the money so long as they comply with the instructions of the donor.
- (2) Independent and cooperative services or programs.--Upon its own initiative or in cooperation with historical societies or organizations, conduct investigations upon historical or archaeological matters relative to this Commonwealth and report the findings for public information; with the approval of the Governor, enter into agreements with responsible historical associations, foundations and similar private organizations or with Federal agencies or public agencies of other states in order to carry on services or programs.
- (3) Archaeological and anthropological investigations.--Examine, or cause to be examined, research or excavate the occupation or activity sites or areas and the cultural material remains of Native

American, Colonial American and more recent American cultures in this Commonwealth, under the professional direction of the commission through the techniques of archaeology, anthropology and history; acquire, by purchase, gift or fieldwork, archaeological or anthropological collections of objects and data relative to the cultural history of this Commonwealth; conduct, or cause to be conducted, archaeological site surveys to locate, catalog, assess and permanently record these historic resources throughout this Commonwealth; maintain a central repository for map locations and written descriptions of such sites and historic resources; conduct, or cause to be conducted, research upon the cultural objects and data related to the cultural history of this Commonwealth and interpret the results of the research in scientific and popular publications, exhibits and special educational programs for the public; and undertake appropriate conservation, research, restoration and storage of all material items and data relative to the cultural heritage of this Commonwealth, which accrue to the archaeological and anthropological collections of the commission.

- (4) Cooperation with qualified historical or archaeological societies.—Cooperate with any qualified historical or archaeological society in investigations of historical or archaeological matters relating to this Commonwealth and in arranging, cataloging, displaying and microfilming collections of historical papers and documents, and objects or materials relative to the natural or cultural history of this Commonwealth, and otherwise encourage their activities.
- (5) Historical commemorations.--Develop, coordinate and carry out plans for celebrations commemorating important historical events, which shall be selected by the commission or the General Assembly upon passage of a concurrent resolution, in cooperation with qualified historical or archaeological societies and other responsible organizations.
- (6) Geographic names.--Determine all unsettled questions concerning geographic names which arise in any department and determine the names of mountains, rivers, creeks and other topographic features in this Commonwealth. In the exercise of its powers and the performance of its duties under this paragraph, the commission shall cooperate with the United States Board on Geographic Names.
- (7) Procurement of expert advice.—Consult with or procure the advice of experts in archaeology, anthropology, history, historical restoration, archival management, museum work or other fields related to its activities, compensate them for their services and establish committees of experts as needed to procure the advice.
- (8) Museum assistance and local history grant program.—Establish and administer the museum assistance and local history grant program. The commission shall be required to approve all individual grants. All such grants shall be subject to audit review by the commission.
- (9) Advisory boards.--Create such advisory boards as the commission may deem appropriate to perform duties designated by the commission. The names of proposed members of such advisory boards shall be submitted to the Governor for approval.
- (10) Police powers.--Exercise the police powers necessary to enforce the law, including the rules and regulations of the commission. Authorized employees shall have full power to make arrests, with or without warrant, for all violations of law which they may witness upon the premises of any historic property to which they are assigned and may serve and execute warrants issued by proper authorities for any violation of law committed thereon.
- (11) Rules and regulations.--Promulgate rules and regulations necessary for the implementation of its powers and duties.
- (12) Annual reports.--Annually transmit to the State Government Committees of the House of Representatives and the Senate a report which includes the following:
 - (i) A summary of the overall condition of museums and historic sites and holdings, including staffing levels and site visits by senior management personnel.
 - (ii) A report on the operation of the Conservation Center.
 - (iii) A summary of all publications completed by the commission during the

prior year.

- (iv) A summary of collection deaccessioning activities.
- (v) A summary of the progress in computerization of collections and

inventories.

- (13) Hold harmless authority.--Hold the Federal Government harmless from damages due to construction, operation and maintenance of the Erie Harbor East Canal Basin dredging project under the Water Resources Development Act of 1986 (Public Law 99-662, 33 U.S.C. § 2213(j)), except for damages due to the fault or negligence of the Federal Government or its contractors.
- (14) Publications.--To sell to the public, at a store or by other methods, any publications selected by the commission for sale and published by any department, board, commission or officer of the

Commonwealth, except documents published for the Governor and the General Assembly which shall be distributed by the Governor and the General Assembly without charge. To administer this paragraph, the commission may publish, for free distribution, a price list showing the publications which the commission is prepared to sell to the public and the charges for each publication. The commission shall transfer at least annually, to the fund from which the cost of the publication was paid, the actual cost of production of any publications sold during that period. Any remaining proceeds from the sale of a publication by the commission shall be deposited in the Historical Preservation Fund.

(Nov. 23, 1994, P.L.639, No.97, eff. imd.; Dec. 9, 2002, P.L.1395, No.173, eff. imd.)

<u>2002 Amendment.</u> Act 173 added par. (14). <u>1994 Amendment.</u> Act 97 added par. (13). § 303. Sites.

The commission shall have the power and duty to:

- (1) Museums and historic sites.--Control, direct, supervise, manage and annually inspect the State Museum and those field or regional museums and historic sites authorized or created by statute; conduct continuing studies for the improvement of museum activity; and operate, control, direct, supervise and manage a public outreach program, including a mobile museum program or a program of traveling exhibits.
- (2) Marking historical and archaeological sites.--Upon its own initiative or upon petition of a municipality or historical society, mark by proper monuments, tablets or markers, bearing the Commonwealth crest, places or buildings in this Commonwealth where historical or cultural events have transpired or, with the consent of the state or county having jurisdiction, places or buildings outside of this Commonwealth having to do with its history; and arrange for the care or maintenance of these markers or monuments.
- (3) Management of historic properties.--Based upon accepted professional museum practices, assume the preservation, care and maintenance of historic property, including those historic properties listed in section 702 (relating to powers over certain historic property); promulgate and enforce rules and regulations for the visitation of historic property by the public; and charge admission fees to historic property at its discretion, which fees shall be paid into the State Treasury through the Department of Revenue and credited to the Historical Preservation Fund.
- (4) Preservation and restoration of historical and archaeological sites.--Undertake the preservation or restoration of public buildings, military sites or monuments connected with the history of this Commonwealth; contract with political subdivisions, historical societies or other associations, with proper bond or security, for the maintenance of these building sites or monuments as a consideration for assistance in their erection, restoration, preservation or marking by the commission; and take title to sites of historical markers in the name of the Commonwealth.
- (5) Approval of memorials.--Approve the design, content and proposed location of all official historical monuments, memorials, buildings, tablets and inscriptions proposed for erection or placement on any real property of the Commonwealth.
- (6) Monuments and markers.--Approve the inscription and proposed location of any historical monument or marker to be erected or placed by any public or private corporation, association, society, organization or person at any place in this Commonwealth.
- (7) Geographical signs and markers.--Approve the inscription to be placed on official signs or markers to be erected or renewed on or along any highway at the entrance to a municipality or village, or at or near any river, stream, historical place or other place of interest in this Commonwealth, by the Department of Transportation or by any municipality, for the purpose of identification or for the purpose of giving historical facts concerning the location.

§ 304. Personal property.

The commission shall have the power and duty to:

- (1) Historical artifacts.--Acquire or accept on behalf of the Commonwealth through gifts or bequests, objects or other articles of historical, archaeological, maritime, natural or geological interest which shall be deposited in the State Museum or, at the discretion of the commission, at historic sites and museums committed to its custody or in any other storage facilities as are available to and approved by the commission. The commission may inspect surplus property in the possession of other Commonwealth agencies and receive this property as an historic resource.
- (2) Exhibition of objects.--Conduct under accepted professional practices the management and exhibition of objects; acquire by purchase, gift, loan, bequest or other lawful transfer objects relating to the culture of this Commonwealth and examine, research, catalog and preserve them; manage, care and exhibit

these objects in the areas of natural history, geology, military history, decorative arts, history, maritime history, fine arts, science, industry and technology; select and designate the objects to be exhibited in museums and historic sites in this Commonwealth, including the State Museum; interpret the results of such management and exhibition of objects in museum and academic publications, exhibits and special educational programs for the public; and undertake appropriate professional conservation, restoration and storage of all objects and material items relative to the history of this Commonwealth.

- (3) Lending historic resources.--Lend to any other museum, archival repository, historical society or other reliable organized group of an educational nature any objects, articles of historical interest, manuscripts, documents or other material committed to its custody. The commission shall adopt rules and regulations to provide adequate security for the safe return of the material, which shall include provision for full insurance protection of the loaned material.
- (4) Sale or other disposition.--Exchange or otherwise dispose of material with other museums, archival repositories, historical societies or other reliable organized groups of an educational nature; and sell at public auction historical artifacts, pursuant to its rules and regulations, provided that an historical artifact shall not be sold at public auction unless the commission has determined that the exchange or disposal of that artifact by the other means authorized by this paragraph is not feasible and that the property would not be beneficial to the commission if it were used other than as an artifact. If the original donor was an individual, the original donor shall be notified, if he can be located, and, if the original donor is deceased, his children shall be notified, if they can be located, and be given an opportunity to reacquire the object, prior to its being offered at auction. If the original donor was not an individual, the original donor shall be notified, if it or its successor can be located, and be given an opportunity to reacquire the object, prior to its being offered at auction. The opportunity of an original donor to reacquire an object shall not be construed to diminish the commission's control over an historical artifact subsequent to its acquisition by the commission and prior to its disposition. These sales shall be conducted by the Department of General Services. Income produced through these sales shall be paid into the State Treasury through the Department of Revenue and credited to the Historical Preservation Fund and allocated solely for collection acquisition or conservation purposes. No unique object, article, manuscript, document or other material, which is of special significance to the history of this Commonwealth, shall be sold.
- (5) Notice requirements.--Give written notice of the proposed sale, including a description of the artifact and its condition, and the name and last known address of the donor shall be transmitted to the chairmen of the State Government Committees of the House of Representatives and of the Senate, respectively, before any historic artifact shall be sold pursuant to paragraph (4).

Effective Date. Section 6(1) of Act 72 of 1988 provided that section 304(5) shall take effect in three years. § 305. Documents.

The commission shall have the power and duty to:

- (1) Research on Commonwealth documents.--Examine and copy or microfilm any public records within the control of a Commonwealth agency for the purposes of historical research.
- (2) Preservation of public records.--Preserve all public records throughout this Commonwealth and give special attention to the preservation of all records of the Commonwealth not in current use and of historical value; negotiate for the transfer and receipt of public records from any Commonwealth agency or political subdivision; and provide for the disposition of records not needed or useful in the transaction of current or anticipated future work of the Commonwealth under section 524 of the act of April 9, 1929 (P.L.177, No.175), known as The Administrative Code of 1929. The commission shall be the legal custodian of any public records transferred to it by any Commonwealth agency or political subdivision. The head of any Commonwealth agency or political subdivision may transfer to the commission public records legally in his custody not needed for the transaction of the business of the office whenever the commission is willing to receive and care for them.
- (3) Management of historical documents.--Collect, classify, preserve and make available for reference all records which may come into its possession with the exceptions indicated by the commission; and examine the condition of the public records, books, pamphlets, documents, manuscripts, archives, maps and papers filed or recorded in any Commonwealth agency or political subdivision. The executive director or any employees authorized by him shall have reasonable access to all public records in this Commonwealth for the purpose of examining them and shall report to the commission on their condition.
- (4) Regulation of Commonwealth records.--Recommend such action be taken by the persons having the care and custody of public records as may be necessary to secure their safety and preservation; cause all laws relating to public records to be enforced; and recommend and enforce uniform standards governing the use of paper, ink and filing procedure for all records and papers of Commonwealth agencies

and political subdivisions that are considered of permanent historical importance.

- (5) Certificates relating to public records.--Furnish certificates relating to public records, or copies thereof, upon the payment of fees established by the commission or otherwise fixed by law.
 - (6) Land records.--Maintain and preserve:
 - (i) Records of the first titles acquired by the proprietaries and the Commonwealth to all the lands within its boundaries.
 - (ii) Records of all lands and conveyances from the proprietaries and the Commonwealth to the purchasers of the land.
 - (iii) Papers relating to the surveys of this Commonwealth and county lines and the reports of commissioners relating to the boundary lines of this Commonwealth.
 - (iv) Maps and other papers pertaining to the colonial history of this

Commonwealth.

- (v) Contracts, section profile maps and other records relating to public works.
- (vi) All other relevant records relating to titles of real estate acquired by the

Commonwealth.

§ 306. Publications and reproductions.

The commission shall have the power and duty to:

- (1) General.--Publish or republish, either through the Department of General Services or cooperatively by and with private historical organizations, materials of historical or archaeological interest; compile, edit and print these publications; enter into agreements with publishers to subsidize the publication of books on Pennsylvania history, archaeology, anthropology, art, cartography, folklore and other cultural elements of Pennsylvania's heritage by agreeing to purchase a sufficient number to make publication possible, but these agreements shall be subject to the approval of the Governor and the State Treasurer; produce or reproduce facsimiles of historical material and enter into agreements to subsidize the manufacture of facsimiles of historical material by agreeing to purchase a sufficient number to make manufacture possible, but these agreements shall be subject to the approval of the Governor and the State Treasurer; sell publications, reprints of publications, reproductions or replicas, postcards and souvenirs of an historical nature at the State Museum and at the other historic properties and museums administered by the commission; and sell to the public any publications selected by the commission for sale and published by any department, board, commission or officer of the Commonwealth.
- (2) Official repositories.--Establish one official repository for its publications from among the qualified historical or archaeological societies within each of the geographic areas established and defined by the Department of Community Affairs as "Standard Regions." The Pennsylvania State Library and the Library of Congress shall also be official repositories for commission publications.
- (3) Disposition of commission publications.--Make one copy of each commission publication available at cost to all qualified historical or archaeological societies; and deliver one copy of each commission publication without charge to each official repository. The commission is excluded from the provisions of section 2406 of the act of April 9, 1929 (P.L.177, No.175), known as The Administrative Code of 1929.
- (4) Proprietary rights to subscription lists.--Maintain proprietary rights over subscriber, membership or address lists that it creates which are excluded from provisions of the act of June 21, 1957 (P.L.390, No.212), referred to as the Right-to-Know Law.

(Dec. 9, 2002, P.L.1395, No.173, eff. imd.)

References in Text. The Department of Community Affairs, referred to in par. (2), was abolished by Act 58 of 1996 and its functions were transferred to the Department of Community and Economic Development. § 307. Qualified historical and archaeological societies.

Any historical or archaeological society in this Commonwealth shall be deemed to be a qualified historical or archaeological society if it:

- (1) Has at least 100 paid members, has been organized at least two years and has been incorporated as a corporation not-for-profit.
- (2) Holds at least one public meeting annually at which papers are read or discussions held on historical or archaeological subjects.
- (3) Has adopted a constitution and bylaws and has elected proper officers to conduct its business.
- (4) Has either established a museum or library in which books, documents, papers and other objects of historical and cultural interest are deposited or has made periodic publications totaling at least 25 pages each year relating to the history of this Commonwealth or of the area in which the society is located.

Cross References. Section 307 is referred to in section 103 of this title.

CHAPTER 5 HISTORIC PRESERVATION

Sec.

- 501. Short title of chapter.
- 502. Powers and duties of commission.
- 503. Inclusion of property on register.
- 504. Historic Preservation Board.
- 505. Powers and duties of board.
- 506. Archaelogical field investigations on Commonwealth land.
- 507. Cooperation by public officials with the commission.
- 508. Interagency cooperation.
- 509. Transfer of Commonwealth land involving historic resources.
- 510. Approval of construction affecting historic resources.
- 511. Criminal penalties.
- 512. Enforcement of historic preservation laws and policies.

Enactment. Chapter 5 was added May 26, 1988, P.L.414, No.72, effective immediately.

§ 501. Short title of chapter.

This chapter shall be known and may be cited as the Historic Preservation Act.

§ 502. Powers and duties of commission.

In addition to the powers and duties provided in Chapter 3 (relating to powers and duties of Pennsylvania Historical and Museum Commission), the commission shall have the power and duty to:

- (1) Initiate and coordinate a Statewide survey to identify and document the historic resources in this Commonwealth, whether publicly or privately owned.
- (2) Compile, maintain, revise and publish a selected inventory of significant historic resources in this Commonwealth, to be known as the Pennsylvania Register of Historic Places, pursuant to criteria of significance approved by the commission.
 - (3) Conduct research and compile documentation regarding historic resources.
- (4) Prepare a comprehensive plan for the preservation of the historic resources in this Commonwealth, including suggested priorities for the allocation of public and private financial resources.
- (5) Undertake the activities necessary to qualify the Commonwealth for participation in programs and sources of Federal assistance for purposes of historic preservation.
- (6) Provide information and advice on historic resources and appropriate preservation procedures to public officials, private individuals and organizations.
- (7) Advise public officials regarding the planning and implementation of undertakings affecting historic resources.
- (8) Provide technical and financial assistance to public officials, private individuals and organizations engaged in historic preservation activities.
- (9) Undertake activities to stimulate public interest in historic preservation, including publications, newsletters and conferences.
- (10) Coordinate and comment upon activities of public officials affecting historic resources and preservation activities.
- (11) Solicit, receive and utilize funds from any public or private source for purposes of historic preservation.
- (12) Acquire easements in properties of historic, architectural and archaeological significance by gift, purchase, devise or any other lawful transfer when acquisition is necessary for the preservation thereof.
- (13) Rent or lease historic resources and associated properties for purposes of historic preservation.
- (14) Contract with other states, public officials in this Commonwealth or private individuals and organizations for purposes of historic preservation.
- § 503. Inclusion of property on register.

The owner of private property of historic, architectural or archaeological significance, or a majority of the owners of private properties within a proposed historic district, shall be given the opportunity to concur in, or object to, the nomination of the property or proposed district for inclusion on the Pennsylvania Register of Historic Places. If the owner of the property, or a majority of the owners of the properties within the proposed historic district, object to the inclusion, the property shall not be included on the register. § 504. Historic Preservation Board.

- (a) Membership.--The board shall be composed of no less than nine residents designated by the commission, pursuant to recommendations by the executive director with the approval of the Governor. The board shall include at least one member with demonstrated competence in each of the following disciplines: architecture, archaeology, architectural history, history and historic preservation.
- (b) Term of office.--Members shall serve for a term of two years without compensation, other than reimbursement for actual and necessary expenses incurred in the performance of their duties in accordance with Commonwealth regulations, and shall serve until a successor is appointed and qualified. § 505. Powers and duties of board.

The Historic Preservation Board shall have the power and duty to:

- (1) Advise the commission on criteria of significance for inclusion of historic resources on the Pennsylvania Register of Historic Places.
- (2) Review and recommend nominations of historic resources to the National Register of Historic Places.
- (3) Review and comment upon the commission's comprehensive preservation plan for historic resources within this Commonwealth.
- (4) Undertake any other activity determined by the commission to be necessary or desirable for the preservation of historic resources.
 - § 506. Archaeological field investigations on Commonwealth land.
- (a) Right to conduct field investigations.--The Commonwealth reserves the exclusive right to conduct archaeological field investigations on archaeological resources owned or controlled by it, in order to protect and preserve archaeological specimens and information. The specimens and information shall remain the property of the Commonwealth and shall be utilized for scientific and public educational purposes.
- (b) Responsibility of commission.--The commission shall be responsible for the preservation, protection and proper investigation of archaeological resources located on land owned or controlled by the Commonwealth, including any submerged land owned or controlled by the Commonwealth.
- (c) Survey of archaeological resources.--The commission shall conduct surveys and prepare maps of archaeological resources located on lands in this Commonwealth and may make available the results of these surveys to the Federal Government, Commonwealth agencies and political subdivisions conducting activities which would affect these archaeological resources. The commission shall have and maintain proprietary rights over the maps and surveys indicating the location of archaeological resources or archaeological field investigations that have been inventoried or surveyed. These maps and surveys are excluded from the provisions of the act of June 21, 1957 (P.L.390, No.212), referred to as the Right-to-Know Law. The commission shall make available in writing, within 30 days of a request, site location information based on recorded material evidence of the commission to Commonwealth agencies, political subdivisions, owners of the site, potential buyers of the site and agents of the site owner with a demonstrated need to know. The failure of the commission to provide this written response shall release the requestor from any further duties under this act.
- (d) Permits for field investigations.--The commission may issue permits for archaeological field investigations, subject to any restraints and conditions it prescribes, if the investigation is undertaken with the purpose of disseminating the knowledge gained and if the applicant agrees to submit to the commission a summary written report of the investigation, containing relevant maps, documents, drawings and photographs. All archaeological specimens collected pursuant to a permit issued under this subsection shall be the exclusive property of the Commonwealth, and the commission shall make appropriate arrangements for their disposition and study.

(Nov. 28, 1995, P.L.647, No.70, eff. 60 days)

1995 Amendment. Act 70 amended subsec. (c).

- § 507. Cooperation by public officials with the commission.
- (a) General rule.--Commonwealth agencies, political subdivisions and municipal authorities shall cooperate fully with the commission in the preservation, protection and investigation of archaeological resources and to that end shall:
 - (1) Notify the commission before undertaking any Commonwealth or Commonwealth-assisted permitted or contracted projects that may affect archaeological sites.

- (2) Notify the commission when they become aware of any undertaking in connection with any Commonwealth or Commonwealth-assisted permitted or contracted project, activity or program which affects or may affect an archaeological site, and provide the commission with information concerning the project, program or activity.
- (b) Survey or investigation by commission.--
- (1) Upon a determination by the commission that any Commonwealth or Commonwealth-assisted permitted or contracted project may adversely affect an archaeological site, the commission may conduct or cause to be conducted through an agent, subcontractor or other person an archaeological survey only when the commission, based on recorded material evidence, determines that the site is a significant archaeological site. A written determination shall be made by the commission within 15 days of receipt of a notification by a Commonwealth agency under subsection (a), provided that until January 1, 1997, such written determination shall be made by the commission within 30 days of receipt of such notification.
- (2) If an archaeological survey is determined necessary by the commission, it shall be completed within 60 days of the determination, except that the commission may notify the project applicant that an additional 30 days may be required when the determination is made during the months of December, January and February.
- (3) No later than 15 days after completion of an archaeological survey and only in exceptional circumstances, the commission may determine in writing that an archaeological field investigation, also known as phase three archaeological research or data recovery, is necessary to recover archaeological data. The archaeological field investigation shall be completed within 90 days of the determination required under this paragraph, except that an additional 30 days may be required when the determination is made during the months of December, January and February.
- (4) Failure of the commission to render a determination within the period allowed in either paragraph (1) or (3) shall be deemed to be a determination that a survey or investigation is not necessary. The failure of the commission to complete an archaeological survey or field investigation within the time limits specified in paragraphs (2) and (3) shall release the project applicant from any further duties under this title, unless the applicant agrees in writing to a specific time extension.
- (5) The commission shall conduct or cause to be conducted through an agent, subcontractor or other person and pay any costs associated with an archaeological survey or field investigation determined necessary by the commission under this section, except for the following:
 - (i) Projects of other State agencies and instrumentalities.
 - (ii) Projects on Commonwealth lands.
 - (iii) Projects of publicly regulated utilities.
 - (iv) Archaeological surveys and field investigations required under Federal law.
- (6) The commission shall pay the political subdivision's and municipal authority's share of any costs associated with any archaeological survey or field investigation conducted or required by the commission on locally owned highways and bridge projects if the project is being undertaken solely with State or local funds.
- (7) The commission under no circumstances shall require, conduct or cause to be conducted through an agent, subcontractor or other person an archaeological survey or field investigation on private property without the consent of the property owner and only under the notice and deadline procedures established under this section.
- (8) All determinations by the commission under this section shall be subject to the provisions of Title 2 (relating to administrative law and procedure).

(Nov. 28, 1995, P.L.647, No.70, eff. 60 days)

<u>Cross References.</u> Section 507 is referred to in section 508 of this title. § 508. Interagency cooperation.

- (a) Responsibilities of Commonwealth agencies.--Commonwealth agencies shall:
 - (1) Consult the commission before demolishing, altering or transferring any property under their ownership or control that is or may be of historical, architectural or archaeological significance.
 - (2) Seek the advice of the commission on possible alternatives to the demolition, alteration or transfer of property under their ownership or control that is on or may be eligible for the Pennsylvania Register of Historic Places.
 - (3) Initiate measures and procedures to provide for the maintenance by means of preservation, rehabilitation or restoration of historic resources under their ownership or control that are listed on or are eligible for the Pennsylvania Register of Historic Places.
 - (4) Institute procedures and policies to assure that their plans, programs, codes, regulations

and activities contribute to the preservation and enhancement of all historic resources in this Commonwealth. However, nothing in this title shall be construed as conferring on the commission the authority to delay, deny, condition or limit or cause to be delayed, denied, conditioned or limited any permits which would otherwise be issued by a Commonwealth agency beyond those time frames specified in section 507 (relating to cooperation by public officials with the commission), unless the applicant agrees in writing to such condition, limit or time extension. An applicant is prohibited from utilizing a permit or license in any manner that would impair or interfere with the performance of an archaeological survey or field investigation until the expiration of the time frames in section 507 or until receiving written notification from the commission that its archaeological survey or investigation is completed, whichever is sooner. Commonwealth agencies likewise are, in the absence of specific statutory language in their enabling or regulatory statutes, prohibited from stopping the processing or denying a permit solely because of the possible or actual presence of archaeological resources.

- (5) Submit the procedures and policies described in paragraphs (3) and (4) to the commission for review and comment.
- (b) Limitation.--Nothing under this act shall confer power upon a political subdivision or municipal authority to delay, deny, condition or limit or cause to be delayed, denied, conditioned or limited any permit or approval because of failure to comply with this act.

(Nov. 28, 1995, P.L.647, No.70, eff. 60 days)

§ 509. Transfer of Commonwealth land involving historic resources.

Commonwealth agencies shall give the commission timely notice of proposed transfers of real property owned or controlled by the Commonwealth. Upon recommendation of the commission, Commonwealth agencies may condition the transfer and may execute covenants, deed restrictions or other contractual arrangements which will most likely result in the preservation of any historic resources located on or under the property to be transferred.

§ 510. Approval of construction affecting historic resources.

The commission shall be consulted on the design and proposed location of any project, building or other undertaking financed in whole or in part by Commonwealth funds which may affect the preservation and development of a district, site or building listed on or eligible for the Pennsylvania Register of Historic Places. § 511. Criminal penalties.

A person who conducts a field investigation on any land or submerged land owned or controlled by the Commonwealth, without first obtaining a permit from the commission, or a person who appropriates, defaces, destroys or otherwise alters any archaeological site or specimen located upon lands owned or controlled by the Commonwealth, except in the course of activities pursued under the authority of a permit granted by the commission, commits a misdemeanor of the third degree and shall, upon conviction, be sentenced to pay a fine of not more than \$2,500 or to imprisonment for not more than one year, or both. In addition, such person shall forfeit to the Commonwealth all archaeological specimens collected or excavated together with any photographs and records relating to such specimens.

§ 512. Enforcement of historic preservation laws and policies.

The Attorney General, the commission, any political subdivision, person or other legal entity may maintain an action in an administrative tribunal or court for the protection or preservation of any historic resource in this Commonwealth.

CHAPTER 7 HISTORIC PROPERTIES

Sec.

701. Title to historic property.

702. Powers over certain historic property.

703. Brandywine Battlefield (Repealed).

704. Washington Crossing (Repealed).

705. United States Brig Niagara.

Enactment. Chapter 7 was added May 26, 1988, P.L.414, No.72, effective immediately.

§ 701. Title to historic property.

(a) General rule.--Unless otherwise provided by statute with respect to particular historic property, the title to historic property shall be taken in the name of this Commonwealth and shall, before its acquisition, be certified by counsel for the commission.

- (b) Leases.--
- (1) For purposes of historic preservation, or for educational, recreational or agricultural purposes, or for parking areas or concessions for the convenience and comfort of the public, the commission may lease historic property for a period not to exceed five years to any person or organization of the Commonwealth. The commission shall lease the property in the following manner:
 - (i) Those sites and museums which have nonprofit allied groups whose purpose is related to the educational mission of a particular property shall receive special contract preference. In those instances where the above criteria is met, the commission shall be permitted to enter into a lease without competitive bidding.
 - (ii) When the criteria enumerated in subparagraph (i) are not met, sites and museums are to be leased in accordance with competitive bidding procedures, i.e. open to all profit and nonprofit organizations. All requests for bid proposals, as well as the leases, shall contain restrictions protecting the historical integrity of the site, insuring that appropriate historical preservation standards are maintained and require appropriate insurance coverage by the lessee.
- (2) If a substantial capital investment is involved, the commission may, with the approval of the Governor, enter into such leases for that period required under sections 48(g)(2)(B)(vi) and 168(c) of the Internal Revenue Code of 1986 (Public Law 99-514, 26 U.S.C. §§ 48, 168) relating to investment tax credit for historic preservation.
- (3) The commission shall monitor those leased properties to insure they are being managed in accordance with State law.
- (4) The commission may lease historic property to a political subdivision willing to assume total fiscal and management responsibility for a period of time up to 99 years, provided that such leases contain restrictions protecting the historical integrity of the site, insuring that appropriate historical preservation standards are maintained and require appropriate insurance coverage by the lessee. § 702. Powers over certain historic property.

In addition to all other powers vested in the commission by this title or other statute, the commission shall

- exercise all powers conferred on it by law with respect to the historic properties known as:
 - (1) (Deleted by amendment).
 - (2) (Deleted by amendment).
 - (3) Brandywine Battlefield.
 - (4) Brightbill Property.
 - (5) Bushy Run Battlefield.
 - (6) Captain Phillips' Rangers Memorial.
 - (7) Cashiers House.
 - (8) Conrad Weiser Homestead.
 - (9) Cornwall Iron Furnace.
 - (10) Curtin Village.
 - (11) Daniel Boone Homestead.
 - (12) David Bradford House.
 - (13) Drake Well Museum.
 - (14) Eckley Miners' Village.
 - (15) Ephrata Cloister.
 - (16) Fort Augusta.
 - (17) Fort Le Boeuf Museum.
 - (18) Fort Loudon.
 - (19) Fort Pitt Museum.
 - (20) French Azilum.
 - (21) Governor Printz Park.
 - (22) Graeme Park.
 - (23) Harmony Society Graveyard.
 - (24) Historic Peace Church.
 - (25) Hope Lodge.
 - (26) John Brown House.
 - (27) (Deleted by amendment).
 - (28) Joseph Priestley House.
 - (29) Judson House.
 - (30) Landis Valley Museum.
 - (31) Mather Mill.

- (32) McCoy House.
- (34) Morton Homestead.
- (35) Museum of Anthracite Mining.
- (36) Nathan Denison House.
- (37) Old Brown's Mill School.
- (38) Old Chester Court House.
- (39) Old Custom House.
- (40) Old Economy Village.
- (41) Old Mill Village.
- (42) (Deleted by amendment).
- (43) Pennsbury Manor.
- (44) Pennsylvania Anthracite Heritage Museum.
- (45) Pennsylvania Lumber Museum.
- (46) Pennsylvania Military Museum.
- (47) Pithole City.
- (48) Pottsgrove Mansion.
- (49) Railroad Museum of Pennsylvania.
- (50) Robert Fulton Birthplace.
- (51) Searights Tollhouse.
- (52) Sodom School House.
- (53) Somerset Historical Center.
- (54) The Highlands.
- (55) The Pennsylvania State Archives.
- (56) The Scranton Iron Furnace.
- (57) The State Museum of Pennsylvania.
- (58) Thomas Hughes House.
- (59) Tuscarora Academy.
- (60) United States Brig Niagara.
- (61) Warrior Run Church and Cemetery.
- (62) Washington Crossing.

(Dec. 9, 2002, P.L.1395, No.173, eff. imd.)

<u>Cross References.</u> Section 702 is referred to in section 303 of this title. § 703. Brandywine Battlefield (Repealed).

1998 Repeal Note. Section 703 was repealed December 21, 1998, P.L.1270, No.163, effective in 90 days. Section 2 of Act 163 provided that the Brandywine Battlefield Park Commission is abolished, and section 3 of Act 163 provided that all of the powers, duties, functions, funds, assets, books, records and any other documents and real and personal property of the Brandywine Battlefield Park Commission are transferred to the Pennsylvania Historical and Museum Commission.

§ 704. Washington Crossing (Repealed).

1998 Repeal Note. Section 704 was repealed December 21, 1998, P.L.1270, No.163, effective in 90 days. Section 2 of Act 163 provided that the Washington Crossing Park Commission is abolished, and section 3 of Act 163 provided that all of the powers, duties, functions, funds, assets, books, records and any other documents and real and personal property of the Washington Crossing Park Commission are transferred to the Pennsylvania Historical and Museum Commission.

§ 705. United States Brig Niagara.

- (a) Official flagship of Pennsylvania.--The restored United States Brig *Niagara* shall be the official flagship of Pennsylvania. It shall be known as the "Flagship of Pennsylvania" and its home port shall be Erie, Pennsylvania.
 - (b) Powers and duties of the commission.--The commission shall have the power and duty to:
 - (1) Cooperate with the Department of Military Affairs, the United States Navy and other appropriate organizations in commemorating significant events of our naval and maritime heritage.
 - (2) Sail the United States Brig *Niagara*, within the means at its command, to various ports of call and commemorative events as the official sailing ambassador for Pennsylvania.
 - (3) Charge whatever fees are necessary to maintain the vessel and to encourage private financial support as appropriate in order to support the United States Brig *Niagara* and its sailing program.

- (c) Cooperation by public officials with the commission.--Commonwealth agencies and political subdivisions shall cooperate fully with the commission in support of its naval and maritime history program and, to that end, shall:
 - (1) Include the commission in any planning efforts for the commemoration of significant events of our naval and maritime history.
 - (2) Develop plans with the commission which will utilize the United States Brig *Niagara* as the official flagship of Pennsylvania.

CHAPTER 9 CONCURRENT JURISDICTION

Sec.

- 901. Cession of concurrent jurisdiction.
- 902. Sites affected.
- 903. Transfer of personal property.
- 904. Acceptance by United States.
- 905. Acceptance by Governor.
- 906. Police service agreements.

Enactment. Chapter 9 was added May 26, 1988, P.L.414, No.72, effective immediately.

§ 901. Cession of concurrent jurisdiction.

The Commonwealth of Pennsylvania hereby cedes to the United States concurrent jurisdiction over lands, waters and buildings within the boundaries of units of the National Park System administered by the United States Department of the Interior National Park Service, including those owned, leased or administratively controlled by the National Park Service, as well as all lands and buildings hereafter acquired, leased or administratively controlled by the National Park Service.

§ 902. Sites affected.

The existing National Park Service lands, waters and buildings affected by the provisions of this chapter are as follows:

- (1) Allegheny Portage National Historic Site.
- (2) Delaware Water Gap National Recreation Area.
- (3) Edgar Allen Poe National Historic Site.
- (4) Eisenhower National Historic Site.
- (5) Fort Necessity National Battlefield.
- (6) Friendship Hill National Historic Site.
- (7) Gettysburg National Military Park.
- (8) Gloria Dei (Old Swede's) Church National Historic Site.
- (9) Hopewell Furnace National Historic Site.
- (10) Independence National Historical Park.
- (11) Johnstown Flood National Memorial.
- (12) Thaddeus Koscuiszko National Memorial.
- (13) Valley Forge National Historical Park.

§ 903. Transfer of personal property.

In any case where the Commonwealth has heretofore transferred land to the United States for use as a national park, the transfer shall also include the transfer to the United States of such personal property as may be included in a written agreement between the Pennsylvania Historical and Museum Commission and the National Park Service.

§ 904. Acceptance by United States.

Cession of jurisdiction shall become effective when it is accepted on behalf of the United States. Acceptance shall be indicated, in writing upon the instrument of cession, by an authorized official of the United States and filed with the Secretary of the Commonwealth.

§ 905. Acceptance by Governor.

- (a) Relinquishment by United States.--Whenever the United States tenders to the Commonwealth of Pennsylvania a relinquishment of all or part of the legislative jurisdiction theretofore acquired by it over lands within this Commonwealth, the Governor is authorized to accept, on behalf of the Commonwealth, the legislative jurisdiction so relinquished.
 - (b) Publication.--The Governor shall indicate his acceptance of relinquished legislative jurisdiction by a

writing addressed to the head of the appropriate department or agency of the United States. This acceptance shall be effective upon the publication of the writing in the Pennsylvania Bulletin. § 906. Police service agreements.

A municipality or the Pennsylvania State Police may enter into cooperative police service agreements with the National Park Service for the purpose of providing employees of the National Park Service who hold a valid law enforcement commission, issued by that agency, the authority to enforce Title 75 (relating to vehicles) on roads, other than Federal roads, which lie within units of the National Park System which are within the jurisdiction of the municipality's police department or the Pennsylvania State Police.

day, May 01, 2018 4:49:23 PM

From: Everard, Robert

Sent: Tuesday, May 01, 2018 3:45 PM

To: Fulmer, John «|fulmer@burnsmcd.com>
C: Harris, Brandy M
burnsmcd.com>; Gottsfield, Andrew <agottsfield@burnsmcd.com>
Subject: RE:

Here's a screenshot of the CRGIS homepage, before entering the portal it has some basic language. Also located here: https://www.dot7.state.pa.us/CRGIS

Robert Everard
Office: 818.287.281
Cett: 818.285.098
From: Fullmer, John
Sent Tuesday, May 01, 2018 3:25 PM
To: Everard, Robert ceverard@burnsmed.com
Cet Harris, Brandy M ceverard@burnsmed.com
Cet Harris, Brandy M ceverard@burnsmed.com
Subject:

See highlighted section