



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

---

Anthony D. Kanagy

akanagy@postschell.com  
717-612-6034 Direct  
717-720-5387 Direct Fax  
File #: 166570

September 27, 2018

***VIA ELECTRONIC FILING***

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

**Re: Application of Transource Pennsylvania, LLC for approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection - East and West Projects in portions of York and Franklin Counties, Pennsylvania - Docket Nos. A-2017-2640195 & A-2017-2640200**

Dear Secretary Chiavetta:

Enclosed for filing is the Answer of Transource Pennsylvania, LLC to the Motion of Stop Transource Franklin County for an Extension of Time to Submit Written Testimony in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/jl  
Enclosures

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

**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 3<sup>rd</sup> Street  
Waynesboro, PA 17268

Danielle Bernecker  
1827 Wood Duck Dr E  
Chambersburg, PA 17202

Courtney & Derek Dettinger  
24 Chanceford Rd  
Brogue Pa 17309

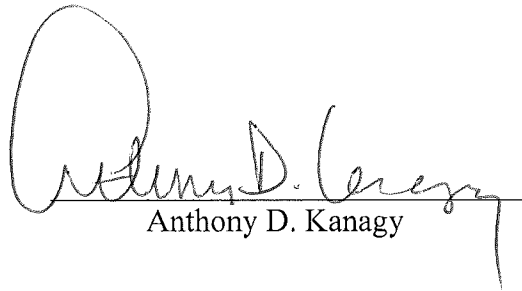
James McGinnis, Jr.  
290 Woolen Mill Road  
New Park, PA 17352

Darwyn Benedict  
410 N. Grant Street  
Waynesboro, PA 17268

Clint Barkdoll  
Owls Club, Inc.  
87 West Main Street  
Waynesboro, PA 17268

Jan & Georgiana Horst  
826 New Franklin Road  
Chambersburg, PA 17201

Date: September 27, 2018



Anthony D. Kanagy

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :  
filed Pursuant to 52 Pa. Code Chapter 57, :  
Subchapter G, for Approval of the Siting and : Docket Nos. A-2017-2640195  
Construction of the 230 kV Transmission Line : A-2017-2640200  
Associated with the Independence Energy :  
Connection-East & West Projects in Portions :  
of Franklin and York Counties, Pennsylvania :

---

**ANSWER OF TRANSOURCE PENNSYLVANIA, LLC  
TO THE MOTION OF STOP TRANSOURCE FRANKLIN COUNTY FOR AN  
EXTENSION OF TIME TO SUBMIT WRITTEN TESTIMONY**

---

Transource Pennsylvania, LLC (“Transource PA”) hereby submits this Answer to The Motion of Stop Transource Franklin County (“STFC”) for an Extension of Time to Submit Written Testimony at Docket No. A-2017-2640195 and Docket No. A-2017-2640200. For the reasons explained herein, STFC’s request for additional time to submit written testimony should be denied, and its Motion should be dismissed. STFC did not attempt to contact Transource PA in advance of filing its Motion to discuss this issue, which was filed in the afternoon of the date that its testimony was due. In addition, STFC does not have a reasonable basis for withholding all of its testimony because it is waiting for answers to, in effect, three discovery requests, which were subject to a Motion to Compel that could and clearly should have been filed months earlier. STFC’s actions are unreasonable and should not be accepted. STFC must have prepared its testimony at this time and appears to be using the late-filed Motion to Compel as an excuse to delay its testimony and shorten Transource PA’s opportunity for review.

The long-standing practice before the Pennsylvania Public Utility Commission (“PUC”) is to file testimony and to supplement it later for any outstanding discovery. STFC should be ordered to immediately provide its testimony and in no case later than October 4, 2018. In

addition, STFC should provide any supplemental direct testimony relating to the updated discovery responses that will be provided pursuant to the ALJs' ruling on the Motion to Compel no later than two weeks after the responses are provided. STFC's actions of not reaching out to Transource PA to discuss this issue, not filing any testimony on the due date, and filing a Motion on the day testimony is due is unreasonable and should not be accepted. This is prejudicial because it delays Transource PA's time to review STFC's testimony and could be used by STFC to attempt to further delay the schedule in this proceeding.

## **I. INTRODUCTION**

On December 27, 2017, Transource PA filed Applications for Approval of the Siting and Construction of 230 kV Transmission Lines in Portions of York County at Docket No. A-2017-2640195 ("IEC-East Project") and in portions of Franklin County at Docket No. A-2017-2640200 ("IEC-West Project") (collectively, the "Independence Energy Connection Project" or "IEC Project").

After a Prehearing Conference on March 13, 2018, a Procedural Order was entered on March 28, 2018, and amended on April 2, 2018. Public Input hearings were held on May 9 and 14, 2018 in York County and on May 22 and 23, 2018 in Franklin County.

On May 15, 2018, Transource PA filed 133 Condemnation Applications and two Zoning Shelter Petitions, one in Franklin County at Docket No. P-2018-3001878, and one in York County at Docket No. P-2018-3001883.

On May 29 and 30, 2018, site views took place in Franklin County, and on June 1, 2018, site views took place in York County.

On June 1, 2018, the Office of Consumer Advocate ("OCA") filed a Motion to Amend the Procedural Schedule. Transource PA filed an Answer to the OCA's Motion on June 6, 2018.

On June 26, 2018, the ALJs issued a Third Prehearing Order. The Third Prehearing Order granted the OCA's request to extend the deadline for filing Intervenor Direct Testimony until September 25, 2018 and consolidated the Condemnation Applications and Zoning Shelter Petitions with the Siting Applications.

A Second Prehearing Conference was held on July 9, 2018.

On September 12, 2018, Transource PA filed 48 Petitions to Withdraw Condemnation Applications associated with the IEC Project.

Additional Public Input hearings were held in Franklin County on September 18, 2018 and in York County on September 20, 2018.

The parties have engaged in extensive discovery in this proceeding.

With respect to some of the discovery requests in this proceeding, the parties have sought intervention from the ALJs to resolve their disputes. Relevant to this Answer is the discovery that is the subject of STFC's Motion to Compel filed on August 31, 2018.

On April 18, 2018, STFC served its first set of interrogatories ("Set I Interrogatories") and requests for production of documents ("Requests for Production") on Transource PA.

On April 30, 2018, Transource PA filed objections to certain of the requests in STFC's Set I Interrogatories and Requests for Production.

On May 9, 2018, Transource PA, without waiving its objections, served responses to STFC's Set I Interrogatories, Nos. 1-5, 12-17, and 19-21 and Requests for Production, Nos. 1-30. These answers included responses to all of the questions that are the subject of STFC's Motion to Compel.

On May 14, 2018, counsel for STFC informed counsel for Transource PA that STFC anticipated it would know by May 17, 2018 whether any motion practice would be necessary concerning the responses that were served on May 9, 2018.

Transource PA served the responses to Set I Interrogatories, No. 6-11 and 18 on June 11, 2018.

On June 27, 2018, counsel for STFC contacted counsel for Transource PA to express what, in STFC's view, were deficiencies in the answers provided by Transource PA. Despite informing Transource PA that it would know by May 17, 2018 whether there were any issues with the responses served on May 9, 2018, STFC waited approximately 6 weeks from the date the responses were served to inform Transource PA that STFC did not believe that the answers provided were sufficient. See Attachment "A". If STFC had responded promptly, as it said it would, STFC's Motion could have been filed much earlier.

On July 10, 2018, both parties conducted a phone conference to discuss the discovery issues, at which time Transource PA agreed to supplement its initial discovery responses without waiver of its objections filed April 30, 2018.

Transource PA submitted its supplemental responses to STFC on July 27, 2018.

On August 1, 2018, counsel for STFC sent Transource PA an e-mail requesting that the parties' agreement to suspend the deadline for a motion to compel be continued.

On August 17, 2018, counsel for Transource PA indicated that Transource PA would agree to allow STFC until August 24, 2018 to file a motion to compel.

On August 23, 2018, counsel for STFC requested additional time until August 31, 2018 to file its motion to compel. Transource PA sent STFC an e-mail indicating Transource PA would not object to this request upon several conditions, including that STFC agree not to seek a



delay of the September 25, 2018 due date for direct testimony. STFC did not respond to this e-mail from Transource PA.

On August 31, 2018, STFC filed its Motion to Compel with respect to certain requests in its Set I Interrogatories and Requests for Production.

On September 5, 2018, Transource PA filed an Answer to STFC's Motion to Compel.

On, September 24, 2018, the ALJs issued an Order Granting in Part and Denying in Party, STFC's Motion to Compel.

## **II. LEGAL STANDARD**

STFC files its Motion pursuant to 52 Pa. Code § 1.15, which provides as follows:

. . . whenever under this title or by order of the Commission, or notice given thereunder, an act is required or allowed to be done at or within a specified time, the time fixed or the period of time prescribed may, by the Commission, the presiding officer or other authorized person, for good cause be extended upon motion made before expiration of the period originally prescribed or as previously extended. Upon motion made after the expiration of the specified period, the act may be permitted to be done where reasonable grounds are shown for the failure to act.

The primary basis for STFC's request to extend the deadline for submitting its written testimony is that there are certain outstanding interrogatories that are the subject of a currently pending discovery dispute. Transource PA submitted its responses to the subject interrogatories on May 9, 2018. After discussions with STFC's counsel, Transource PA agreed to supplement certain of these responses and did so on July 27, 2018. Yet, STFC did not submit any written testimony on September 25, 2018, the due date provided for in the procedural schedule, and waited until the same day its direct testimony was due to file its request for an extension. STFC had approximately nine months from the filing date to prepare its testimony in this proceeding and has failed to provide any testimony on the due date on the basis that it is waiting for a few

discovery responses. This action is unreasonable on its face, clearly prejudicial to Transource PA, and should not be accepted.

As explained herein, STFC's request is unreasonable and should be denied because STFC has not shown good cause for extending the deadline for its direct testimony. *See., e.g., Pickford v. Pennsylvania-American Water Company*, Docket No. C-20078029, 2009 Pa. PUC LEXIS 822, \*19 (February 12, 2009) (request for extension to file testimony denied where good cause not shown).

In its Motion, STFC points out that the Commission's regulations allow for sanctions against party who fails to respond to discovery requests. See 52 Pa. Code §§ 5.371, 371(a)(4). Such action is not warranted in this case because Transource PA has been responsive to all discovery issued by STFC and has complied with all discovery orders from the ALJs in this proceeding. To the contrary, STFC's failure to reach out to Transource PA to discuss an extension, failure to provide any testimony on the due date and waiting until the day testimony is due to file its Motion are not reasonable actions and should not be accepted.

### **III. ARGUMENT**

#### **A. STFC's allegation that Transource has not provided updated route information for the IEC Project does not warrant allowing STFC an extension of time to submit written testimony.**

In its Motion, STFC argues that it should be allowed an additional 30 days to submit written testimony because Transource has not provided an update to the proposed route for the IEC Project since the filing of its Application on December 27, 2017. STFC specifically contends that Transource PA's request to withdraw certain Condemnation Applications associated with the IEC Project is "one indication" that Transource has altered the proposed right-of-way since submitting the Application. (STFC Motion, p. 6) STFC's theory regarding

the proposed route for the IEC Project is incorrect and does not justify extending the deadline to submit written testimony as set forth in the existing procedural schedule.

One of the bases for STFC's argument to extend the deadline for submission of its written testimony is that Transource PA filed Petitions requesting to withdraw 48 of the previously filed Condemnation Applications associated with the IEC Project. As explained in the Petitions, 37 landowners have now signed voluntary option agreements and 11 landowners originally identified in the Condemnation Applications are no longer affected by the proposed right-of-way due to engineering modifications. As such, the previously filed Condemnation Applications for these landowners are no longer necessary.

STFC alleges that Transource provided no further explanation for its request to withdraw a portion of the Condemnation Applications. However, on September 19, 2019, Transource PA served an updated discovery response to OCA Set XIX, Question 2, which provided additional detail regarding its requests to withdraw certain of the Condemnation Applications. In that response, Transource PA explained:

The Company has removed 48 landowners from the eminent domain application. Thirty-seven (37) landowners have signed voluntary option agreements with the Company to locate the transmission line right-of-way on their property(s). Eleven (11) landowners originally identified in the initial eminent domain application are no longer affected by the proposed right-of-way. The Company has completed parcel boundary surveys and has progressed in the engineering and design of the transmission line, making it possible to eliminate landowners from the filing that are not impacted by the right-of-way.

The proposed route for the IEC Project has not materially changed from the route that was originally proposed in the Siting Application. The proposed route is still within the original 1,000 foot corridor. 52 Pa. Code § 57.76. Accordingly, no changes to the siting study are necessary. The purpose of the regulation granting a 1,000 foot corridor (500 feet on either side of the center line) is to allow utilities to adjust the precise location within the corridor for

engineering reasons, to mitigate impacts or for other reasons. The 1,000 foot corridor has not changed and the slight adjustment of the center line within the corridor provides no basis for an extension of time for STFC to file its direct testimony.

It is unreasonable to suggest that STFC did not have information sufficient to prepare its testimony regarding the proposed route, which was explained in detail in Transource PA's Application, when the corridor had not changed since the Application was filed on December 27, 2017. STFC has had sufficient information to evaluate the proposed route since the Siting Application was filed. No other party in this proceeding contended that they had insufficient information to evaluate Transource PA's proposed route. Any minor revisions to the center line within the corridor, that have occurred since the filing of Transource PA's Siting Application do not justify allowing STFC any additional time to submit written testimony.

Finally, STFC argues in its Motion that Transource PA has not provided the information necessary to meet its burden in this proceeding. If this is STFC's position, STFC is free to present it in testimony, but STFC's opinion that Transource PA has not met its burden does not demonstrate a need to extend the deadline for written testimony.

Transource PA is updating its mapbook to show how the center line shifted within the corridor and the updated parcel boundaries. Transource PA intends to provide this information by September 28, 2018. However, the issue is whether the corridor is reasonable compared to other alternatives, not whether the center line moves within the corridor. See 52 Pa. Code § 57.76. In addition, if STFC believes that the center line change is relevant, it can file supplemental testimony addressing this issue. STFC is not justified to withhold all of its testimony.

**B. The discovery requests that are the subject of STFC's Motion to Compel do not justify extending the due date for STFC's written testimony.**

In its Motion, STFC argues that it has been unable to prepare written testimony because it is awaiting a determination as to an outstanding Motion to Compel. The disputed discovery pertains to certain very limited topics and does not provide a sufficient basis to excuse STFC from not submitting written testimony on the due date. Moreover, the delay in resolving this discovery dispute is attributable to STFC.

STFC served its Set I Interrogatories on Transource PA on April 18, 2018. Transource PA filed timely objections to certain of the requests. On May 9, 2018, without waiving its objections, Transource PA served responses to several of the Set I Interrogatories, including all of the interrogatories that are the subject of the dispute. STFC waited over a month to inform Transource PA that STFC believed additional information was necessary to respond to its requests. Transource PA agreed to submit additional information to STFC and did so on July 27, 2018. STFC then waited over another month to file its Motion to Compel. Clearly, the delay in resolving the discovery dispute has been caused by STFC. As a result, STFC should not be entitled to additional time to submit direct testimony so as to further delay this proceeding.

STFC's claim that it has not been provided with sufficient information to prepare written testimony is without merit. Throughout this proceeding, Transource PA has responded to approximately 387 interrogatories from various parties, many of which had several subparts, and pertain to topics ranging from need, siting, environmental, cost/benefits, and many other issues. Transource PA has provided many thousands of pages of documents. The topics covered by the disputed discovery are very limited and involve the following: (1) the underlying data used to conduct certain field surveys; (2) Pennsylvania Historic and Museum Commission information; (3) existence of hydrological water wells connected to the right-of-way; and (4) the dollar

amount of projects managed by AEP and GPE. The ALJs issued an Order on September 24, 2018, directing Transource PA to provide this information with 10 days. Therefore, STFC will have an adequate opportunity to review the responses and addresses this information in supplemental testimony if it deems necessary. With respect to updates regarding the permit matrix, Transource PA will provide the updated permit information when it is available and STFC can address it at that time or in Surrebuttal. This is no basis for withholding all testimony.

Despite the significant amount of information provided by Transource PA throughout the discovery process, STFC submitted no testimony on the due date provided for in the procedural schedule, even with respect to issues other than those that are the subject of the disputed discovery. Extending the deadline for STFC's written testimony by 30 days is not justified because Transource PA has provided a substantial amount of information upon which STFC can evaluate the proposed IEC Project and any delay in receiving responses to the limited number of outstanding discovery requests has been due to STFC's own delay. STFC should be ordered to provide its direct testimony immediately and in no event later than October 4, 2018. STFC should also be required to provide any supplemental testimony on the limited discovery subject to the Motion to Compel no later than two weeks after the responses are provided or by October 18, 2018.

**C. Further delay in the procedural schedule would materially prejudice Transource.**

In its Motion, STFC contends that extending the deadline for filing its written testimony by 30 days would not materially prejudice Transource PA. STFC's contention is incorrect. Depending upon the testimony provided by STFC, Transource PA may be required to hire an outside expert to respond and in any case will be required to conduct discovery on this

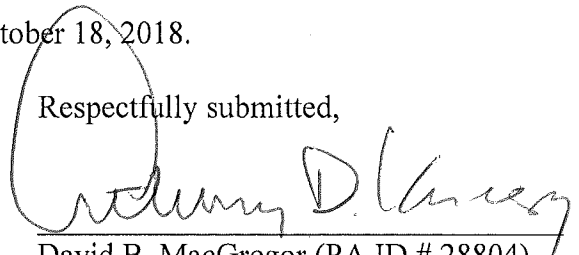
testimony. The procedural schedule allows STFC 20 days to respond to discovery. Transource PA will be substantially prejudiced by STFC's delay in forwarding its testimony.

In addition, STFC has already had approximately nine months from the filing date to submit written testimony. Under the existing procedural schedule, Transource PA has approximately two months to prepare its rebuttal testimony, compared to the approximate nine months other parties' had to submit their direct testimony. Any further delay in the procedural schedule in this proceeding would materially prejudice Transource PA. Transource PA should be given the same extension for rebuttal that STFC receives for its direct testimony, with no extension for STFC's surrebuttal.

#### **IV. CONCLUSION**

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that STFC's Motion for an Extension of Time to Submit Written Testimony be denied. STFC should be directed to immediately provide its direct testimony, and in no event provide it later than October 4, 2018. In addition, STFC should be required to submit any supplemental testimony on the limited discovery subject to the Motion to Compel by October 18, 2018.

Respectfully submitted,



Amanda Riggs Conner (District of Columbia  
ID # 481740)  
Hector Garcia (VA ID # 48304)  
American Electric Power Service Corporation  
1 Riverside Plaza, 29th Floor  
Columbus, OH 43215  
Phone: 614-716-3410  
Fax: 614-716-1613  
E-mail: arconner@aep.com  
E-mail: hgarcia1@aep.com

David B. MacGregor (PA ID # 28804)  
Anthony D. Kanagy (PA ID # 85522)  
Lindsay A. Berkstresser (PA ID #318370)  
Post & Schell, P.C.  
12th Floor  
Harrisburg, PA 17101-1601  
Phone: 717-731-1970  
Fax: 717-731-1985  
E-mail: dmacgregor@postschell.com  
E-mail: akanagy@postschell.com  
E-mail: lberkstresser@postschell.com

Date: September 27, 2018

Counsel for Transource Pennsylvania, LLC

# **Attachment “A”**



## **Berkstresser, Lindsay**

---

**From:** Waldron, Joanna A. <JAW@curtinheefner.com>  
**Sent:** Monday, May 14, 2018 3:48 PM  
**To:** Kanagy, Anthony  
**Cc:** Berkstresser, Lindsay; Yeager, Jordan B.; 'Hector Garcia (hgarcia1@aep.com) (hgarcia1@aep.com)'  
**Subject:** Transource Discovery responses

Dear Mr. Kanagy,

We received Transource's CDs and Responses to our discovery requests in the mail today. Thank you. During our conference call, both sides agreed to waive the discovery deadlines, pending your production and pending our opportunity to review the discovery responses. We anticipate that we will know by Thursday whether any motion practice is necessary. Thank you again for your cooperation in this matter.

--

Joanna A. Waldron, Esquire (<mailto:JAW@curtinheefner.com>)  
Curtin & Heefner LLP  
Doylestown Commerce Center, 2005 South Easton Road,  
Suite 100, Doylestown, Pennsylvania 18901  
Phone: (267) 898.0570 Fax: (215) 340.3929

[www.curtinheefner.com](http://www.curtinheefner.com)

Newtown/Yardley Office:  
1040 Stony Hill Road, Suite 150  
Yardley, PA 19067  
Phone (215) 736.2521

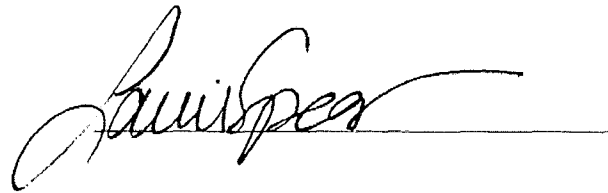
NJ Office:  
100 Overlook Center  
2<sup>nd</sup> Floor  
Princeton, NJ 08540  
Phone (609) 375.2817

THE INFORMATION CONTAINED IN THIS EMAIL MESSAGE IS INTENDED ONLY FOR THE PERSONAL AND CONFIDENTIAL USE OF THE DESIGNATED RECIPIENTS NAMED ABOVE. This message may be an attorney-client communication and as such is privileged and confidential. If the reader of this message is not the intended recipient, or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error, and that any review, dissemination, distribution or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone or return email and delete the material from any computer, without copying. Although this e-mail is not intended to contain any virus or defect, you are responsible for ensuring that no virus or defect exists that may affect your computer. The sender disclaims any responsibility for any loss or damages arising from any virus or defect associated with this e-mail. Thank you.

**VERIFICATION**

I, Laurie M. Spears, being the Transmission Asset Strategy Manager at American Electric Power Service Corporation hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 9/27/18

A handwritten signature in cursive script, appearing to read "Laurie M. Spears", written over a horizontal line.