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Lindsay A. Berkstresser

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June 18, 2019

#### 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 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 and West Projects in Portions of York and Franklin Counties, Pennsylvania Docket No. A-2017-2640195 & A-2017-2640200

Petition of Transource Pennsylvania, LLC for a finding that a building to shelter control equipment at the Rice Substation in Franklin County, Pennsylvania is reasonably necessary for the convenience or welfare of the public Docket No. P-2018-3001878

Petition of Transource Pennsylvania, LLC for a finding that a building to shelter control equipment at the Furnace Run Substation in York County, Pennsylvania is reasonably necessary for the convenience or welfare of the public Docket No. P-2018-3001883

Application of Transource Pennsylvania, LLC for approval to acquire a certain portion of the lands of various landowners in York and Franklin Counties, Pennsylvania for the siting and construction of the 230 kV Transmission Lines associated with the Independence Energy Connection - East and West Projects is necessary or proper for the service, accommodation, convenience or safety of the public - Docket Nos. A-2018-3001881, et al.

Dear Secretary Chiavetta:

Rosemary Chiavetta, Secretary June 18, 2019 Page 2

Enclosed for filing on behalf of Transource Pennsylvania, LLC is the Motion to Suspend the Procedural Schedule in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

indsay A. Berkstresser

LAB/jl Enclosures

cc: Honorable Elizabeth Barnes Honorable Andrew M. Calvelli

Certificate of Service

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania, LLC

for approval of the Siting and Construction of :

the 230 kV transmission Line Associated with: Docket Nos. A-2017-2640195 the Independence Energy Connection-East & A-2017-2640200

West Projects in Portions of Franklin and York

Counties, Pennsylvania

Petition of Transource Pennsylvania, LLC for a : finding that a building to shelter control

equipment at the Rice Substation in Franklin County, Pennsylvania is reasonably necessary

for the convenience or welfare of the public

Docket No. P-2018-3001878

Petition of Transource Pennsylvania, LLC for a : finding that a building to shelter control equipment at the Furnace Run Substation in

York County, Pennsylvania is reasonably and necessary for the convenience or welfare of the

public

Application of Transource Pennsylvania, LLC for approval to acquire a certain portion of lands of various landowners in York and Franklin Counties, Pennsylvania for the siting and construction of the 230 kV Transmission Line associated with the Independence Energy Connection – East and West Projects as the proper for or accommodation, convenience or safety of the

public

Docket Nos. A-2018-3001881, et al.

Docket No. P-2018-3001883

### MOTION TO SUSPEND THE PROCEDURAL SCHEDULE

## TO ADMINISTRATIVE LAW JUDGES ELIZABETH H. BARNES AND ANDREW M. **CALVELLI:**

As explained herein, Transource Pennsylvania, LLC ("Transource PA") hereby files, pursuant to 52 Pa. Code §§ 5.103 and 1.15, this Motion to Suspend the Procedural Schedule. In support of its Motion, Transource PA states as follows:

1. On April 2, 2019, Administrative Law Judges Elizabeth H. Barnes and Andrew M. Calvelli (the "ALJs") issued the Tenth Prehearing Order. The Tenth Prehearing Order amended the procedural schedule in this proceeding as follows:

Other Parties' Surrebuttal Testimony

May 29, 2019

Transource PA's Written Supplemental Rejoinder Testimony

Further Evidentiary Hearings Regarding Reliability

Main Briefs

July 24, 2019

Reply Briefs

August 23, 2019

- 2. The OCA submitted supplemental surrebuttal testimony on May 29, 2018. STFC submitted supplemental surrebuttal testimony on June 3, 2019.
  - 3. Transource PA submitted its supplemental rejoinder testimony on June 17, 2019.
- 4. Transource PA is in the process of engaging in settlement discussions with parties. In order to allow the parties additional time to continue settlement discussions, Transource PA requests that the further evidentiary hearing currently scheduled for June 27-28, 2019 and the briefing schedule be postponed. Transource PA requests that the hearing be rescheduled within 60 days.
- 5. Transource PA proposes to provide the ALJs with a status report as to the status of its settlement negotiations with the parties within 30 days of an order granting this motion.
- 6. Transource PA has informed Stop Transource Franklin County, Citizens to Stop Transource York County, the Office of Consumer Advocate, York County Planning Commission, MAIT, PPL Electric, and PECO of its request and is not aware of any opposition.

WHEREFORE, for the foregoing reasons, Transource Pennsylvania, LLC respectfully requests that Administrative Law Judges Elizabeth H. Barnes and Andrew M. Calvelli grant this Motion, postpone the hearing and briefing schedule in this matter, and reschedule the hearing within 60 days.

# Respectfully submitted,

Amanda Riggs Conner (District of Columbia

ID # 481740)

Hector Garcia (VA ID # 48304)

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Date: June 18, 2019 Attorneys for Transource Pennsylvania, LLC

# 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).

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Date: June 18, 2019

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