COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE 555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 800-684-6560

March 31, 2020



FAX (717) 783-7152 consumer@paoca.org

Via Electronic Mail Only Anthony D. Kanagy, Esquire Lindsay Berkstresser, Esquire David B. MacGregor, Esquire Post & Schell, P.C. 17 North Second Street, 12th Floor Harrisburg, PA 17101-1601

 Re: Amended 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

Amended 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

Amended 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

Amended 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 Line associated with the Independence Energy Connection – East and West Projects as necessary or proper for the service, accommodation, convenience or safety of the public

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

Dear Counsel:

Enclosed you will find two copies of the Interrogatories of the Office of Consumer Advocate, Set XLVII, in the above-referenced proceedings.

Anthony D. Kanagy, Esquire Lindsay Berkstresser, Esquire David B. MacGregor, Esquire March 31, 2020 Page 2

In accordance with the Amended Procedural Order, we request that the Company provide verified answers to these inquiries within ten (10) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our office, as listed below:

Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923

If you have any questions, please call us. Please note we are only using e-service at this time due to the COVID-19 emergency. Hard copies will be provided later when normal operations resume. A certificate of service showing service of these interrogatories in the manner above has been filed with Secretary Rosemary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Respectfully submitted,

<u>/s/ Phillip D. Demanchick</u> Phillip D. Demanchick Assistant Consumer Advocate PA Attorney I.D. # 324761 E-Mail: <u>PDemanchick@paoca.org</u>

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service only) Certificate of Service

*285891

Amended 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
Amended 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
Amended 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
Amended 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 Line associated with the Independence Energy Connection – East and West Projects as necessary or proper for the service, accommodation, convenience or safety of the public	Docket Nos.	A-2018-3001881 et al.

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Transource Pennsylvania, LLC, Set XLVII, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 31st day of March 2020.

SERVICE BY E-MAIL ONLY

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(Please note we are only using e-service at this time due to the COVID-19 emergency. Hard copies will be provided later when normal operations resume)

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Counsel for: Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 Phone: (717) 783-5048 Fax: (717) 783-7152 Dated: March 31, 2020 *285893