

2/26/19 Hbg JK

**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, et al.
Docket No. A-2017-2640195, et al.**

**Responses of the Office of Consumer Advocate to
Transource's Interrogatories and
Requests for Production of Documents
SET II**

Transource to OCA-II-7

7. Re OCA Statement No. 2, page 10. Mr. Lanzalotta states on line 20 that there is “no reliability need for the IEC.”
- a) Prior to submitting testimony, did Mr. Lanzalotta review the updated TEAC analysis on Project 9A presented by PJM on September 13, 2018?
 - b) Is Mr. Lanzalotta aware that PJM determined that there would be significant reliability violations if the IEC Project were not constructed? If yes, please explain your position that there is no reliability need?

Answer:

The request selectively quotes from Mr. Lanzalotta's testimony which states: “Based on the Company's filed testimony, there is no reliability need for the IEC which PJM says would address congestion on the transmission system.”

- a) Yes.
- b) Mr. Lanzalotta is aware that the documentation provided regarding the updated TEAC analysis makes reference to reliability violations, but is not aware that such violations were identified or characterized as “significant”, or that any analysis of what system reinforcements other than the IEC might be sufficient to remedy these violations. Further, no reliability violations are claimed in the Company's filing before the Pennsylvania Public Utility Commission.

Prepared by: Peter Lanzalotta

JAN 23 2019

2/26/19
Hbg



Barron Shaw
445 Salt Lake Rd
Fawn Grove, PA 17321
(717) 993-4488
barron@shaworchards.com

January 21, 2019

Anthony D. Kanagy, Esquire
Post & Schell P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

RE: Application of Transource Pennsylvania, LLC Docket A-2017-2640195 and A-2017-2640200

Dear Mr. Kanagy:

Enclosed please find Barron Shaw's responses to Transource's Discovery Request H directed to Barron Shaw and Shaw Orchards.

Please feel free to contact me directly if you have any questions.

Sincerely,

Barron Shaw
barron@shaworchards.com

Enclosure

cc: PUC Secretary Chiavetta, (Letter & Certificate of Service Only)
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
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 Rd.
New Park, PA 17352

Jan & Georgiana Horst
826 New Franklin Rd.
Chambersburg, PA 17201

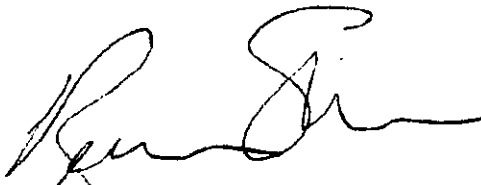
Darwyn Benedict
410 N. Grant St.
Waynesboro, PA 17268

Delores Krick
Muddy Creek Meadows Riding Stable
699 Frosty Hill Rd.
Airville, PA 17302

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

VERIFICATION

I, Barron Shaw, 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.



Barron Shaw

Response of Barron Shaw
PUC Docket Nos. A-2017-2650195, A-2017-2640200, et al.

Response to Transource Interrogatory II
Response prepared by Barron Shaw
Response date: January 21, 2019

Q1: Re Shaw Statement No. 1, p. 8. Describe the referenced irrigation system in detail.
a) Provide the manufacturer, model, age, and design and operation specifications of the irrigation system.

A1: The irrigation was initially designed and installed in 1983 by Trickle-Eez corporation. There is no model or manufacturer for the system as a whole. The water source is the largest pond on the farm, and the pump is housed in a shed adjacent to the pond. The system is comprised of electrical systems powered by a single phase 220v circuit, a Phasemaster rotary phase converter, a 10hp 3 phase pump (Stay-rite model 20E2BS70M3), an Olson filtration system, a low voltage injection pump system, a 24v control system that controls remote solenoid valves in the field, and a chemical tank for fertigation. The suction head is approximately 3 feet. Distribution is handled through buried PVC main lines that vary in size from 4" to 1 1/2". Field valves are sometimes below ground, and sometimes above ground. Water is distributed to crops via flexible tubing that runs on top of the ground, or sometimes a few inches underground. Field crops such as raspberries and strawberries use trickle "tape" (e.g., model AS 5400-45), and trees use tubing with built-in emitters. The field applications using tape have pressure regulators to reduce pressure. The tree applications run at full system pressure.

Q2: Is the irrigation system above or below ground?

A2: Please see response to 1).

Q3: Where is the irrigation system located on the property?

a) Please provide a map or scale drawing depicting the location of the irrigation system in relation to the right-of-way and the proposed line.

A3: Please see attached map.

Q4: Please provide the maximum operating pressure of the irrigation system .

A4: We have no records documenting this value. The value could be determined by calculating the power available from the pump, rated at 10hp.

Q5: Has the irrigation system ever been damaged in the past? If so, please describe the cause of the damage.

A5: Yes. There have been at least two times when the buried PVC ruptured for no apparent reason. It was buried 3 feet deep, well below the frost line, yet when the system was started, the pipes blew apart and high pressure water excavated a hole. On other occasions, risers or vent pipes that protrude above surface had been broken off by tractors. Trickle hoses are very frequently damaged by mowers. Trickle hoses are nibbled by insects or vermin causing spray leaks.

Q6: Has the irrigation system ever broken in the past? If so, please describe each instance in detail and describe any damage caused as a result

A6: Yes. The irrigation system sometimes blows fuses. The flow control sensor (that will shutdown

the pump if it senses low flow) has malfunctioned. Mice have destroyed the control panel. Solenoid valves in the field are struck by lightning or simply stop working. All of these events rendered the system inoperable.

Q7. Has the irrigation system ever been repaired? If yes, please describe each repair, including who performed the repair and which parts were replaced, if any.

A7. I have repaired all the problems mentioned in 5) and 6). In cases of pipes breaking below ground, the fix involves excavation of the pipe, clean cuts, and compression splices to mend the break. In cases of pipe breaking above ground, the repair is made with new PVC and glue. In cases of defective valves, new valves are fitted to the pipe. In the case of the flow control sensor, it needed to be replaced. And in the case of the control panel, I needed to design and install a new relay system in order to replace the old mechanical control system with a newer solid state system that could still control the injection pump.

Q8. Does the irrigation system have a shut-off valve?

A8. The system has a main shutoff valve at the pump house.

Q9. Is Barron Shaw and/or Shaw Orchards a member of any other party that is participating in this proceeding? If so, please identify which party.

A9. Yes, Barron Shaw is a member of Citizens to Stop Transource.

Q10. Has Barron Shaw and/or Shaw Orchards provided funding in any form to any party that is participating in this proceeding? If yes, please provide the amount and the party to which the funding was provided.

A10. I object to this question on the basis that it is unlikely to result in an answer that is material to this case. Notwithstanding the objection, neither Shaw Orchards nor Barron Shaw has contributed funding to any party participating in this case.

Q11. Does Barron Shaw and/or Shaw Orchards conduct maintenance on the irrigation system while it is operating?

A11. Yes.

Q12. If the irrigation system has ever broken, what is the maximum distance spray from the broken irrigation system has traveled?

A12. Approximately 75-100 feet.

Q13. Is there any documentation or manual related to operation or maintenance of the irrigation system? If yes, please provide copies.

Q14. Please see attached page describing winterizing and startup procedures.

Q14. Will any portion of the proposed line cross over an irrigation system located in Pennsylvania?

A14. No. However the presence or lack of irrigation does affect the profitability of Shaw Orchards.

Q15. Can the irrigation system be considered a drip irrigation system?

A15. Yes. However the design does not preclude use in other ways.

Q16. Re p. 8 of Shaw Statement No. 1, is the irrigation system referenced in the West Penn case the same type of irrigation system owned by Barron Shaw and Shaw Orchards?

A16. Barron Shaw lacks information to form a belief about the specifications of the irrigation system referenced in the West Penn case.



White line indicates buried irrigation header. Yellow line is IEC path. All fields at the end of each white line have the capability of being irrigated. Triangles = valves

1. Turn main breaker off.
2. Open zone valves manually to relieve pressure off lines.
3. Open drain cock on bottom of pump housing.
4. Open all manual drain valves in main and submains.
5. Open and/or remove drains on eye strainer and/or sand filters.
6. Sand filters - put in approximately 1 gallon dilute solution of anti-freeze to prevent damage to the intake fingers.
7. For surface water units - remove suction lines and intake strainers from pond.
8. For well models - remove water from submersible drop pipe to at least 3 ft. below ground level.
9. For shallow wells - open petcock to allow air to break vacuum so that water in suction piping will drop back into well.
10. Flush and drain fertilizer and/or chemical pumps.
11. Leave all drains slightly open.

INITIAL START UP EACH YEAR

1. Close all drains, and manual bleed or zone valves, that were opened when winterizing system.
2. Replace suction lines and intake strainers in pond.
3. Hand fill suction pipe as soon as possible before reattaching suction piping at unions.
4. For self-priming and centrifugal pumps - remove yellow priming plug on top of pump manifold and fill pump chamber with water then replace yellow plug.
5. For straight centrifugal pumps - remove yellow priming plug top of pump manifold and install hand priming pump to fill intake pipe and pump chambers. Remove hand priming pump and replace yellow plug.
6. Turn on main breaker and start pump. If not pumping within 30 seconds, turn unit off and reprime.