

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Transcontinental Gas Pipe Line) Docket No. CP15-138-000
Company

**MOTION TO INTERVENE OUT-OF-TIME OF
OF PPL ELECTRIC UTILITIES CORPORATION**

Pursuant to Rules 211 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”),¹ PPL Electric Utilities Corporation (“PPL Electric”) hereby moves to intervene out-of-time in the above-captioned proceeding.

I. COMMUNICATIONS

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II. DESCRIPTION OF MOVANT

PPL Electric is a Pennsylvania corporation and a wholly owned subsidiary of PPL Corporation. PPL Electric is an owner of transmission facilities in PJM

¹ 18 C.F.R. §§ 385.212, 385.214 (2016).

Interconnection, L.L.C., and distributes electricity to all retail customers within its service territory in central eastern Pennsylvania. The proposed construction corridor for the Atlantic Sunrise Project crosses through PPL Electric's service territory and Transco is seeking to condemn a PPL Electric right-of-way that will adversely impact PPL Electric's transmission infrastructure development plans.

III. INTERVENTION

Rule 214(d) directs the Commission to consider the following when deciding whether to grant a late intervention: (1) whether the movant had good cause for failing to file the motion with the time prescribed; (2) whether any disruption of the proceeding might result from permitting the intervention; (3) whether the movant's interest is not adequately represented by other parties in the proceeding; and (4) whether any prejudice to, or additional burdens upon, the existing parties might result from permitting the intervention.² PPL Electric has good cause for not having filed earlier to intervene in this proceeding, its interest cannot be represented by any other party, and its participation will not prejudice or impose a burden on any other party. Therefore, PPL Electric should be permitted to intervene in this proceeding.

Good cause exists for the Commission to grant PPL Electric leave to intervene out-of-time in this proceeding. PPL Electric recently has become aware of the extent to which Transco intends to use PPL Electric's right-of-way during the construction and operation of the Atlantic Sunrise Project. Rather than constructing its pipeline on the periphery of the right-of-way to minimize impacts

² See 18 C.F.R. § 385.214(d).

on PPL Electric, Transco plans to construct its path centrally within the right-of-way, which is expected to interfere with PPL Electric's ability to construct a transmission line on the right-of-way to meet customer needs and improve transmission system resiliency.

Transco's assurances that it understood PPL Electric's transmission needs and could construct the pipeline on the periphery of the right-of-way to minimize impact, led PPL Electric to believe that the impacts of Transco's plans were minimal when in fact, the opposite is true. In prior proceedings where a party was not provided with adequate notice of a project's scope and/or impact, the Commission determined that good cause existed to grant a late intervention.³

PPL Electric recognizes that the Commission's disfavors granting motions to intervene made at the rehearing stage of a proceeding. However, good cause exists in this instance. PPL Electric accepts the record as it currently exists, and its interest as a property owner who -- in the near term -- has necessity to use its existing right-of-way for its own construction project cannot adequately be represented by any other party.

PPL Electric's late intervention will impose no disruption or delay in this proceeding. Numerous parties have already filed motions for rehearing of the Commission's February 3, 2017 Order Issuing Certificate⁴ and for a stay of these proceedings. The Commission will already need comprehensively to address concerns regarding the order in light of those pleadings.

³ See, e.g., *Florida Gas Transmission Co.*, 100 FERC ¶ 61,282 at P10-11 (2002)

⁴ *Transcontinental Gas Pipe Line Company, LLC*, 158 FERC ¶ 61,125 (2017).

IV. CONCLUSION

WHEREFORE, for the foregoing reasons, PPL Electric respectfully requests that the Commission grant its Motion to Intervene Out-of-Time, making it a party to his proceeding.

Respectfully submitted,

/s/ Sandra E. Rizzo

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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing pleading this March 6th, 2017, upon each person designated on the official service list compiled by the Secretary in this proceeding.

/s/ Darrell Reddix
Darrell Reddix