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File #: 150995

April 3, 2013

VIA E-MAIL & REGULAR MAIL

Honorable David A. Salapa
Administrative Law Judge
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

Re: Application of PPL Electric Utilities Corporation filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of Transmission Lines Associated with the Northeast-Pocono Reliability Project in Portions of Luzerne, Lackawanna, Monroe, and Wayne Counties, Pennsylvania Docket No. A-2012-2340872, et al.

The Honorable David A. Salapa:

This letter is in response to the April 1, 2013 letter filed by North Pocono Citizens Alert Regarding the Environment (“NPCARE”), requesting a site visit of a limited, select portion of the transmission line route proposed by PPL Electric Utilities Corporation (“PPL Electric”) in the above-captioned matter. For the reasons explained below, PPL Electric does not believe that the requested site visit is necessary and, moreover, believes that any site visit conducted in this matter should not be held on the same date as the Public Input Hearings.

On December 28, 2012, PPL Electric filed the “Application of PPL Electric Utilities Corporation filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of Transmission Lines Associated with the Northeast-Pocono Reliability Project in Portions of Luzerne, Lackawanna, Monroe, and Wayne Counties, Pennsylvania” (“Siting Application”), which was docketed at Docket No. A-2012-2340872. Therein, PPL Electric is seeking the Approval of the Pennsylvania Public Utility Commission to site and construct a new 58-mile 230 kV transmission line and five new 138/69 kV transmission lines, collectively approximately 11.3 miles, to connect the new North Pocono and West Pocono 230-69 kV Substations to the existing 230 kV and 138/69 kV transmission systems (“Northeast Pocono Reliability Project”). Through this proceeding, PPL Electric intends to demonstrate that the

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siting and construction of the proposed Northeast-Pocono Reliability Project in portions of Luzerne, Lackawanna, Monroe, and Wayne Counties, Pennsylvania is reasonably necessary to resolve projected reliability and planning violations and to reinforce the 138/69 kV system in Carbon, Lackawanna, Luzerne, Monroe, Pike, and Wayne Counties by bringing a new 230 kV supply source closer to the growing load centers.

NPCARE has requested a site visit of a select portion of the proposed 230 kV transmission line between the new West Pocono and North Pocono 230-69 kV Substations. Specifically, NPCARE has requested a driving site visit of the Phelps Road loop with one stop at the southeast corner of the Phelps Road loop. Phelps Road is an unpaved interior loop located in Lackawanna State Forest near Thornhurst Township, Lackawanna County. Enclosed is a satellite map of Phelps Road with the relevant portion of the proposed 230 kV transmission line superimposed. PPL Electric believes that the requested site visit is unnecessary for several reasons.

First, NPCARE has failed to sufficiently describe the details of its proposed site visit. It is unclear from NPCARE's request whether it intends the requested site visit to be an on-the-record matter. It also is unclear whether the requested site visit is intended to be open to the public or limited to the active parties. In addition, it is unclear what safety procedures/precautions would need to be arranged in advance to ensure the safety of all participants at the site visit, as well as compliance with all applicable agencies. This could be particularly problematic if the site visit is open to the public. Given that NPCARE is requesting the site visit, it should, at a minimum, fully explain these important details.

Second, unlike other transmission projects with existing transmission lines, parties will not be able to see the proposed route of the transmission line. For example, in the Susquehanna-Roseland case, the parties took a site visit of two locations with existing transmission lines located within existing rights-of-way at the time of the site visit. The parties in Susquehanna-Roseland were able to access the existing rights-of-way and to see the actual location of the proposed line. Here, the site visit will not be useful because there currently are no cleared rights-of-way or transmission lines for the parties to observe.

Third, the majority of the Phelps Road loop is unrelated to the proposed route for this section of the 230 kV transmission line. The Phelps Road loop is accessed from Bear Lake Road (Route 2016) via Tannery Road located at the entrance to the Lackawanna State Forest. *See* enclosed map. The total number of miles within the Lackawanna State Forest (from entrance to exit) that would be viewed during the proposed site visit is approximately 7 miles. However, only approximately 1 mile of the proposed route would be visible from the Phelps Road loop (approximately 6/10 of a mile is located on an adjoining property owned by Blue Ridge Real Estate Company and the other 4/10 of a mile is located within the Lackawanna State Forest). *See* enclosed map. PPL Electric does not believe that this approximately 1-mile segment is necessarily representative of the 58-mile 230 kV or 11.3-mile 238/69 kV transmission lines proposed in this matter.

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Fourth, PPL Electric is concerned that the requested site visit will mislead and confuse parties. Parties driving the interior of the Lackawanna State Forest will have no reference as to where the proposed 230 kV transmission line will be located. Without such a reference, the parties participating in the requested site view could be easily confused about the location of the proposed 230 kV transmission line and the potential impacts it may have to the area.

Fifth, given the potential defects and risk of confusion that could be cause by the requested site view, PPL Electric believes that the better course of action is for NPCARE, and other interested parties, to introduce photographs or other imagery of specific areas that are actually located along the proposed route that they are concerned about. Assuming such images are properly authenticated and accurately reflect the location of the proposed route, these could easily be introduced into the record, made available to all parties without the danger of a misleading site visit and subject to cross examination.

Finally, PPL Electric strongly opposes that the site visit be conducted on the same date scheduled for the Public Input Hearings. The Public Input Hearings have been scheduled for May 2, 2013, at 2:00 p.m. and 6:00 p.m. at the Thornhurst Volunteer Fire Hall in Thornhurst Township, Lackawanna County, Pennsylvania. The Thornhurst Volunteer Fire Hall is located approximately 2 hours driving time from Harrisburg and Philadelphia. Given the necessary travel time, the time for assembly and necessary arrangements prior to the site visit, the time necessary for the requested stop on the site visit, and the fact that there are two Public Input Hearings, PPL Electric believes that holding a site visit on the same date scheduled for the Public Input Hearings would result in an extremely long day for the parties and Your Honor.

In summary, PPL Electric believes that the site visit requested by NPCARE has not been sufficiently described, would not be useful or representative of the 58 mile 230 kV or 11.3 238/69 kV transmission lines proposed in this matter, and could be misleading to parties. Further, PPL Electric believes that any of the alleged harms from the proposed Northeast-Pocono Reliability Project could more easily be shown through photographs or other documentary evidence that accurately depicts the actual location of the proposed route and is subject to cross examination. Finally, in the event that Your Honor concludes that a site visit is appropriate, PPL Electric believes that it would not be appropriate to undertaken such a site visit on the same date as the Public Input Hearings scheduled in this matter. For these reasons, PPL Electric does not believe that the requested site visit is necessary

Copies of this letter in response NPCARE's letter request for a site visit is being served in the manner indicated on the enclosed certificate of service. Please do not hesitate to contact me, as indicated above, should you have any questions concerning this matter.

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Respectfully submitted,



Christopher T. Wright

CTW/jl
Enclosure

cc: Certificate of Service
Rosemary Chiavetta, Secretary (*letter and certificate of service only*)

CERTIFICATE OF SERVICE

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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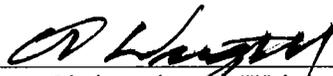
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Date: April 3, 2013



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