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August 22, 2013

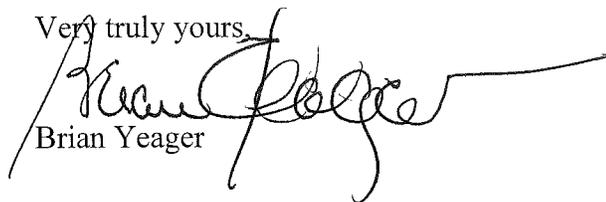
VIA ELECTRONIC FILING

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 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 Nos. A-2012-2340872, et. al.

Dear Secretary Chiavetta:

Enclosed for filing is the brief of the Township of Covington, Lackawanna County in the above matter.

Very truly yours,

Brian Yeager

BY:

cc: David A. Salapa, Administrative Law Judge, via e-mail and first class mail
Board of Supervisors, Township of Covington
Certificate of Service

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.

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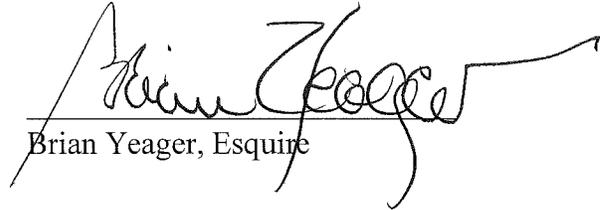
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August __, 2013



Brian Yeager, Esquire

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of PPL Electric Utilities Corporation : Docket No. A-2012-2340872
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 :

Petition of PPL Electric Utilities Corporation : Docket No. P-2012-2340871
for a finding that a building to shelter control :
equipment at the North Pocono 230'69 kV :
substation in Covington Township, Lackawanna :
County, Pennsylvania is reasonably necessary :
for the convenience or welfare of the public :

Petition of PPL Electric Utilities Corporation : Docket No. P-2012-2341105
for a finding that a building to shelter control :
equipment at the West Pocono 230-69 kV :
substation in Buck Township, Luzerne :
County, Pennsylvania is reasonably necessary :
for the convenience or welfare of the public :

Application of PPL Electric Utilities Corporation :
under 15 Pa.C.S. §1511(c) for a finding and :
determination that the service to be furnished :
by the applicant through its proposed exercise :
of the power of eminent domain to acquire a :
certain portion of the lands of the property :
owners listed below for siting and construction :
of transmission lines associated with the :
proposed Northeast-Pocono Reliability Project :
in portions of Luzerne, Lackawanna, Monroe, :
and Wayne Counties, Pennsylvania is necessary :
or proper for the service, accommodation, :
convenience or safety of the public :

John C. Justice and Linda S. Justice : A-2012-2341107

Three Griffins Enterprises, Inc. : A-2012-2341114

| | | |
|---|---|----------------------------------|
| Margaret G. Arthur and Barbara A. Saurman Trustees of the Residuary Trust of James C. Arthur | : | A-2012-2341115 |
| Anthony J. Lupas, Jr. and Lillian Lupas John Lupas and Judy Lupas, Grace Lupas, Eugene A. Bartoli and Robert J. Fankelli | : | A-2012-2341118 |
| Ronald G. Sidovar and Gloria J. Sidovar | : | A-2012-2341120 |
| FR First Avenue Property Holding, LP | : | A-2012-2341123 |
| Transcontinental Gas Pipe Line Corporation | : | A-2013-2341208 |
| William Petrouleas and Joanna Petrouleas | : | A-2013-2341209 |
| Peter Palermo and Francine Palermo | : | A-2013-2341211 |
| Christopher Maros and Melinda Maros | : | A-2013-2341213 |
| Dianne L. Doss | : | A-2013-2341214 |
| Doanld Januszewsk | : | A-2013-2341215 |
| International Consolidated Investment Company | : | A-2013-2341216 |
| Bradley D. Hummel | : | A-2013-2341220 |
| Michael Palermo and Joanne Palermo | : | A-2013-2341221 |
| Roberta Searfoss a/k/a Judy Searfoss Executrix of the Estate of Euylla Hughes a/k/a Eylla Hughes | : | A-2013-2341232 |
| John F. and Veronica Iskra | : | A-2013-2341233 |
| Michael A. Mitch and Sue K. Mitch | : | A-2013-2341234 |
| Clifton Acres, Inc. | : | A-2013-2341236 |
| Dietrich Hunting Club | : | A-2013-2341237 |
| Art Borrower Propco 2010-5 LLC NLMS,Inc. | : | A-2013-2341238 A-2013-2341239 |

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| US Industrial Reit II | : | A-2013-2341241 |
| Ronald Solt | : | A-2013-2341249 |
| Merel J. and Arlene J. Swingle | : | A-2013-2341250 |
| Edward R. Schultz | : | A-2013-2341253 |
| Donald W. Henderson and Louis Bellucci | : | A-2013-2341262 |
| Fr E2 Property Holding LP | : | A-2013-2341263 |
| Sylvester J. Coccia | : | A-2013-2341267 |
| Lawrence Duda | : | A-2013-2341271 |
| Mark M. Mack, J. Dean Mack and Heather K. Mack | : | A-2013-2341272 |
| Blue Ridge Real Estate | : | A-2013-2341277 |
| James L. and Michaelene J. Butler | : | A-2013-2344353 |
| Susan Butler Reigeluth Living Trust | : | A2013-2344604 |
| Blueberry Mountain Realty, LLC | : | A-2013-2344605 |
| Grumble Knot, LLC | : | A-2013-2344612 |
| Pennsylvania Glacial Till, LLC | : | A-2013-2344616 |
| Chris and Melinda Maros | : | |
| v. | : | C-2012-2305047 |
| PPL Electric Utilities Corporation | : | |
| Joe and Vanessa Caparo | : | |
| v. | : | C-2012-2276713 |
| PPL Electric Utilities Corporation | : | |

**BRIEF OF THE TOWNSHIP OF COVINGTON
LACKAWANNA COUNTY, PA**

I. HISTORY OF THE PROCEEDING

PPL Electric Utilities Corporation (“PPL”) is a public utility and electric distribution company subject to the regulatory jurisdiction of the Pennsylvania Public Utility Commission (“Commission”). PPL furnishes electric distribution, transmission, and supplier of last resort services to approximately 1.4 million customers in a service area that includes approximately 10,000 square miles covering all or portions of twenty-nine counties in eastern and central Pennsylvania. PPL Electric's principal offices are located at Two North Ninth Street, Allentown, PA 18101-1179.

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 (the “Project”) in Portions of Luzerne, Lackawanna, Monroe, and Wayne Counties, Pennsylvania" ("Siting Application"), which was docketed at Docket No. A-2012-2340872.

Separately, also on December 28, 2012, PPL filed two Petitions (the Substation Petitions) at Docket Nos. P-2012-2340871 and P-2012-2341105 requesting that the Commission approve the construction of buildings to shelter control equipment associated with the West Pocono and North Pocono substations, respectively.

The Substation Petition filed to Docket No. P-2012-2341105 and addressed the North Pocono Substation being constructed to shelter control equipment (the “Control Equipment Building”) and asserted that this building was reasonably necessary for the convenience or welfare of the public and exempt from the Covington Township Zoning Ordinance.

On January 8, 2013, the Honorable Administrative Law Judge David A. Salapa issued a Prehearing Order No.1 that, *inter alia*, advised parties that they must file a protest or a petition to intervene by February 27, 2013, in order to participate in this matter. Prehearing Order #1 also consolidated the Application and the Two Petitions for the purposes of discovery, litigation and discussion.

On February 22, 2013, Covington Township filed a petition to intervene, a request for a waiver to file answer and new matter to PPL's petition filed at P-2012-2340871 and an answer and new matter to PPL's petition filed at P-2012-2340871.

On February 28, 2013, PPL filed a response to Covington's request for waiver.

On March 13, 2013, the Honorable Administrative Law Judge David A. Salapa issued Prehearing Order #3. This Order denied the request for waiver of Covington Township, but the Order granted the Township's petition to intervene. Prehearing Order #3 also established a schedule for this matter establishing August 26, 2013 as the date for the submission of initial briefs and listing the contents that the briefs must contain.

On July 24, 2013, the Honorable Administrative Law Judge David A. Salapa conducted an evidentiary hearing at which Covington Township submitted into evidence testimony of Katherine Tierney, Secretary of the Township, attesting to the following documents of Covington Township: (i) the Comprehensive Plan; (ii) the Zoning Ordinance; (iii) the Subdivision and Land Development Ordinance; (iv) the Ordinance whereby the Township elected to administer and enforce the Uniform Construction Code; and (v) minutes of the organization meeting of the Township for 2013 listing the Building Inspector for the Township.

II. STATEMENT OF THE CASE

The Northeast-Pocono Reliability Project ("Project") has a significant and negative impact on Covington Township, Lackawanna County, PA ("Covington Township" or

“Township”) as shown by a review of the Comprehensive Plan. The Comprehensive Plan of the Township must be considered by the Pennsylvania Public Utility Commission (“Commission”) in approving this Project. The Commission should order that PPL select an alternate route that does not impact so negatively on the Township.

The Substation Petition at Docket No. P-2012-2341105 (the “PPL Zoning Petition”) requests that the Commission find that the Control Equipment Building to be constructed in Covington Township is exempt from the Covington Township Zoning Ordinance. Covington Township asserts that the Commission should order that the Control Equipment Building must meet the requirements of the Covington Township Subdivision and Land Development Ordinance and be constructed in accordance with the requirements of the Uniform Construction Code as inspected by the Building Inspector of Covington Township. The Commission should also order PPL to provide a preconstruction audit of the Township roads to be used during construction and order them to be brought to the preconstruction level at the end of construction.

III. DISCUSSION

The Commission is to consider the Comprehensive Plan of Covington Township when approving the Project. This will show that the Project does material damage to the planning of the Township. The Comprehensive Plan describes a municipality with open space that must be judiciously developed to maintain the nature of the community. The Project blasts through the open areas and wrecks the judicious development plans of the Township. It materially degrades the nature of the community. For these reasons, the proposed route of the Project should be rejected by the Commission.

The second argument is addresses the building to house the switching equipment, the Control Equipment Building. The cases adequately support the primacy of the Commission of control over the implementation of the public utility facilities. This could include exempting the

Control Equipment Building from inspection under the Uniform Construction Code, though no cases were found addressing this issue.

The concerns of the Township are as follows.

1. What is the liability of the Township if there is a problem with the Control Equipment Building allowed to be built in the Township without inspection by the Township?
2. The Planning Commission of Covington Township has extensive knowledge of and interest in the storm water facilities in the Township. PPL is preparing construction drawings; erosion and sedimentation control plans; and an NPDES permit, without any input from the Township. The primary concern of the Township under storm water is the Control Equipment Building. How can the Township provide input on this construction?
3. The Control Equipment Building is in a forested area along Frytown Road. See Exhibit A to the Zoning Petition and PPL Attachments, Figure 3-10c. When the construction of the Control Equipment Building is complete, is the Township going to be left with roads that are a mess in this area?

Based on the above concerns of the Township, the Commission should order that PPL: (i) obtain a building permit for the Control Equipment Building and comply with inspections by the Township Building Inspector; (ii) prepare a land development plan under the Covington Township Subdivision Ordinance for the Control Equipment Building and submit that plan to the Township Planning Commission; and (iii) prepare a preconstruction audit of the roads in the Township to be used for construction of all Project facilities in the Township and order PPL to return the roads to their preconstruction condition at the completion of construction.

IV. SUMMARY OF THE ARGUMENT

Covington Township has developed and adopted a comprehensive plan to analyze the Township and develop plans for development. The Project significantly and materially impacts this plan. The Commission should order that the Project not go through Covington Township.

The Commission controls all aspects of construction of the Project. The ability of the Township to have input to certain phases of this construction, especially for the Control Equipment Building, is all but non-existent without an order of the Commission. The Commission should order PPL to submit a land development for the Equipment Control Building and order PPL to have the Equipment Control Building inspected by the Building Inspector of the Township in accordance with the Uniform Construction Code. The construction of the Project will impact the roads of the Township. The Commission should order that PPL conduct a preconstruction audit of these roads and bring these roads to this preconstruction condition at the end of construction in the Township.

V. ARGUMENT

The Township has adopted a Comprehensive Plan; a Zoning Ordinance; and a Subdivision and Land Development Ordinance (Testimony of Katherine Tierney, Secretary). The Township has by ordinance elected to administer and enforce the provisions of the Pennsylvania Construction Code Act of 1999, 35 P.S. §§7210.101 – 7210.1103, as amended from time to time, and the regulations in support thereof (Testimony of Katherine Tierney, Secretary).

V-1 COMPREHENSIVE PLAN

Under the provisions of 52 Pa. Code §69.1101 the Public Utility Commission will consider the impact of its decision upon the local comprehensive plan and zoning ordinance. The Comprehensive Plan of Covington Township states the following.

Covington Township is unique among Lackawanna County municipalities in terms of community character and development concerns (Overview-1). The Township has evolved into a bedroom community with residential development scattered throughout the Township and commercial development concentrated in the Daleville area (Overview-1). Although the Township has been as accessible to thousands of urbanites as the other communities in Lackawanna County, surprisingly much of Covington Township remains undeveloped (Overview-1). Clearly, Covington Township is poised to become one of the most changing areas in Lackawanna County (Overview-1). This continued growth presents to the Township the challenge of providing public services and facilities to meet the needs of the increasing population (Overview-1). At the same time, the Township is responsible to assure that the growth and development occurs in accord with sound planning principles with the goal of preserving the environment and community character (Overview-1). In short, the citizens and public official of Covington Township must resolve the land use conflicts which result from the necessary balance between increased development and need for facilities and services, and environmental protection and community and open land conservation (Overview-1).

The Township's physical environment, regional location and past development practices have shaped and maintained its character as a rural-residential community with limited heavy commercial development (Goals and Objectives-3). Maintaining open land and the quality lifestyle associated with it is key to the future of the area (Goals and Objectives-3). An Objective in maintaining the rural-residential character of Covington is to limit heavy commercial uses and industrial uses and to control common law nuisances and threats to public health and safety (Goals and Objectives-4, subparagraphs M & N).

The Project runs through residential and the Special Conservation District of Covington (Attachments in Support of Certification Application [the "PPL Attachments"], Attachment 4 –

Figures; PPL Zoning Petition, paragraph 38). The Project is directly opposed to the existing land use and community character. Covington is described as an area with an attractive rural/residential character (Plans-2). The Project will have a right-of-way two-hundred to two-hundred and twenty-five feet (200' to 225') wide (PPL Attachments, Attachment 5, Figures 5-8 and 5-10); maintained by chemical spraying (PPL Attachments, Attachment 12); and with steel structures of an average height of 150 feet (PPL Attachments, Attachment 5, page 5). This certainly and materially detracts from the Township's rural/residential character.

The Project materially conflicts with the Comprehensive Plan of Covington Township. The Commission should find that the Project has a significantly negative impact on the development of the Comprehensive Plan of the Township. The Commission should order a different route for the Project.

V-2 SUBDIVISION AND LAND DEVELOPMENT ORDINANCE

The Subdivision and Land Development Ordinance ("Subdivision Ordinance") has been adopted to protect the health, safety and general welfare of the citizens of Covington Township by establishing regulations to allow for the proper and controlled development in the Township, to provide for environmental protection and to insure the proper provision of community facilities (Subdivision Ordinance, page 2).

Land development is defined as: (1) a subdivision of land; or (2) the improvement of one lot or two or more contiguous lots, tracts or parcels of land for any purpose involving:

- A. A group of two or more residential or nonresidential buildings, whether proposed initially or cumulatively, or a single nonresidential building on a lot or lots regardless of the number or occupants or tenure (Subdivision Ordinance, page 6).

The Control Equipment Building is a nonresidential building on a lot, and it is a land development. The Commission should order PPL to submit a plan for the erection of the Control

Equipment Building to the Township Planning Commission in accordance with the Subdivision Ordinance (Subdivision Ordinance, page 13, paragraph 301.1).

This is not an onerous requirement. PPL has already stated that they are preparing construction drawings; erosion and sedimentation control plans; and an NPDES permit (PPL Attachments, Attachment 5, page19). In fact, PPL has already submitted the NPDES permit for approval, showing the municipality to be Covington Township, Lackawanna County (Pennsylvania Bulletin, Vol. 43, No. 30, July 27, 2013, page 4230).

The Subdivision Ordinance addresses stormwater and drainage control (Subdivision Ordinance, paragraph 605). The policy of the Commonwealth of Pennsylvania under the Storm Water Management Act is to encourage local administration and management of storm water (32 P.S. §680.3(3)). The Commission should reinforce this policy by ordering PPL to submit a plan to the Township Planning Commission in accordance with the Subdivision Ordinance.

V-3 UNIFORM CONSTRUCTION CODE

Covington Township has by ordinance adopted the Uniform Construction Code (“UCC”). The Township employs a building inspector to enforce the UCC. The Pennsylvania statutes at 35 P.S. §7210.501 specifically states that enforcement of the UCC is done by a municipality that enacts an ordinance adopting the UCC. The UCC applies to the construction of all buildings in the Commonwealth (See 35 P.S. §7210.104(a)). The Township has the responsibility to enforce the requirements of the UCC when the Control Equipment Building is being built. The Commission should order that PPL should apply for a building permit from the Township and have the Control Equipment Building inspected by the Township Building Inspector.

VI. PROPOSED FINDINGS OF FACT

1. Covington Township, Lackawanna County, Pa has adopted a Comprehensive Plan (Testimony of Katherine Tierney, Secretary of the Township).

2. Covington Township is unique among Lackawanna County municipalities in terms of community character and development concerns (Comprehensive Plan, Overview-1).
3. The Township is responsible to assure that growth and development occurs in accord with sound planning principles with the goal of preserving the environment and community character (Comprehensive Plan, Overview-1).
4. The Township's physical environment, regional location and past development practices have shaped and maintained its character as a rural-residential community with limited heavy commercial development (Comprehensive Plan, Goals and Objectives-3).
5. Maintaining open land and the quality lifestyle associated with it is key to the future of the Township (Comprehensive Plan, Goals and Objectives-3).
6. An Objective in maintaining the rural-residential character of Covington is to limit heavy commercial uses and industrial uses and to control common law nuisances and threats to public health and safety (Comprehensive Plan, Goals and Objectives-4, subparagraphs M & N).
7. Covington is described as an area with an attractive rural/residential character (Comprehensive Plan, Plans-2).
8. The Northeast-Pocono Reliability Project runs through residential and open space areas of Covington Township (Attachments in Support of Certification Application ["PPL Attachments"], Attachment 4 – Figures, Map Extent 4).
9. The right-of-way through Covington Township will be two-hundred to two-hundred and twenty-five feet (200' to 225') wide (PPL Attachments, Attachment 5, Figures 5-8 and 5-10).
10. The right-of-way through Covington Township will have steel structures of an average height of 150 feet (PPL Attachments, Attachment 5, page 5).

11. The right-of-way through Covington Township will be maintained by chemical spraying (PPL Attachments, Attachment 12).
12. A building to shelter control equipment (“Control Equipment Building”) will be constructed in Covington Township (PPL Zoning Petition, Docket No. P-2012-2340871).
13. PPL is preparing construction drawings; erosion and sedimentation control plans; and an NPDES permit (PPL Attachments, Attachment 5, page19).
14. PPL has already submitted the NPDES permit for approval, showing the municipality to be Covington Township, Lackawanna County (Pennsylvania Bulletin, Vol. 43, No. 30, July 27, 2013, page 4230).
15. The Township has adopted a Zoning Ordinance and a Subdivision and Land Development Ordinance (Testimony of Katherine Tierney, Secretary).
16. The Township has by ordinance elected to administer and enforce the provisions of the Pennsylvania Construction Code Act of 1999, 35 P.S. §§7210.101 – 7210.1103, as amended from time to time, and the regulations in support thereof (Testimony of Katherine Tierney, Secretary).
17. Covington Township has appointed a Building Inspector for 2013 to enforce the requirements of the Uniform Construction Code (Testimony of Katherine Tierney, Secretary).

VII. PROPOSED CONCLUSIONS OF LAW

- a. To further the State’s goal of making State agency actions consistent with sound land-use planning, and under the act of June 22, 2000 (P. L. 483, No. 67) and the act of June 23, 2000 (P. L. 495, No. 68), the Commission will consider the impact of its decisions upon local comprehensive plans and zoning ordinances. This will include reviewing applications for:
 - (1) Certificates of public convenience.
 - (2) Siting electric transmission lines.
 - (3) Siting a public utility “building” under section 619 of the Municipalities Planning Code (53 P. S. § 10619).

- (4) Other Commission decisions. (52 Pa. Code §69.1101)
- b. This Court has consistently held, however, that the Public Utility Commission has exclusive regulatory jurisdiction over the implementation of public utility facilities. Duquesne Light Co. v. Borough of Monroeville, 449 Pa. 573, 580, 298 A.2d 252, 256 (1972).
 - c. The clear intent of Duquesne, supra, and the many cases cited therein is to uphold the proposition that public utilities are to be regulated exclusively by an agency of the Commonwealth with state-wide jurisdiction rather than by a myriad of local governments with different regulations. Com. v. Delaware & H. Ry. Co., 19 Pa. Cmwlth. 59, 61, 339 A.2d 155, 157 (1975).
 - d. The commission shall have full power and authority, either by or through its members, or duly authorized representatives, whenever it shall deem it necessary or proper in carrying out any of the provisions of, or its duties under this part, to enter upon the premises, buildings, machinery, system, plant, and equipment, and make any inspection, valuation, physical examination, inquiry, or investigation of any and all plant and equipment, facilities, property, and pertinent records, books, papers, accounts, maps, inventories, appraisals, valuations, memoranda, documents, or effects whatsoever, of any public utility, or prepared or kept for it by others, and to hold any hearing for such purposes. In the performance of such duties, the commission may have access to, and use any books, records, or documents in the possession of, any department, board, or commission of the Commonwealth, or any political subdivision thereof. 66 Pa. Cons. Stat. Ann. § 506 (West).
 - e. (b) Municipal administration and enforcement.--This act may be administered and enforced by municipalities in any of the following ways: (1) By the designation of an employee to serve as the municipal code official to act on behalf of the municipality for administration and enforcement of this act. 35 Pa. Stat. Ann. § 7210.501(b) (West).
 - f. The policy and purpose of this act is to:
 - (1) Encourage planning and management of storm water runoff in each watershed which is consistent with sound water and land use practices.
 - (2) Authorize a comprehensive program of storm water management designated to preserve and restore the flood carrying capacity of Commonwealth streams; to preserve to the maximum extent practicable natural storm water runoff regimes and natural course, current and cross-section of water of the Commonwealth; and to protect and conserve ground waters and ground-water recharge areas.
 - (3) Encourage local administration and management of storm water consistent with the Commonwealth's duty as trustee of natural resources and the people's constitutional right to the preservation of natural, economic, scenic, aesthetic, recreational and historic values of the environment. 32 Pa. Stat. Ann. § 680.3 (West).

VIII. PROPOSED ORDERING PARAGRAPHS

A. The Commission hereby orders that in constructing the Northeast-Pocono Reliability Project that PPL shall select a route for the Project that does not go through Covington Township.

In the alternative, if A is not ordered:

B. The Commission hereby orders that in constructing the Northeast-Pocono Reliability Project that PPL shall have the Building Inspector of Covington Township, Lackawanna County, inspect the building to house control equipment being built in Covington Township for compliance with the applicable Uniform Construction Code.

C. The Commission hereby orders that in constructing the Northeast-Pocono Reliability Project that PPL shall submit a land development plan to Covington Township, Lackawanna County, and comply with the Subdivision and Land Development Ordinance of Covington Township.

D. The Commission hereby orders that in constructing the Northeast-Pocono Reliability Project that PPL shall perform a preconstruction audit of the roads of Covington Township to be used for construction of the Project, and return the roads to their preconstruction condition upon the completion of construction.

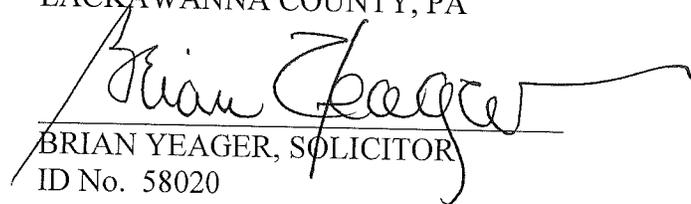
IX. CONCLUSION

Covington Township, Lackawanna County, PA is a unique community that takes serious the development and welfare of its citizens. The Northeast-Pocono Reliability Project is a

traumatic event in the development of the Township. The Township can do no less than to request that the Commission make the requested orders to alleviate the worst impacts on the Township of the Project.

DATE: August 22, 2013

COVINGTON TOWNSHIP
LACKAWANNA COUNTY, PA

A handwritten signature in black ink, appearing to read "Brian Yeager", is written over a horizontal line. The signature is fluid and cursive.

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