

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the matter of 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 the Pennsylvania Portion of the Proposed Susquehanna-Roseland 500 kV Transmission Line in Portions of Lackawanna, Luzerne, Monroe, Pike and Wayne Counties, Pennsylvania

Docket Number A-2009-2082652

PETITION TO INTERVENE OF DONNA DAVIS

Pursuant to Pa. Code 57.75(d) Petitioner requests leave to intervene in this proceeding regarding the siting and construction of the Pennsylvania Portion of the Susquehanna Roseland 500 kV Transmission Line. In support of the Petition, Petitioner represents as follows:

1. Petitioner is a resident of Laurel Creek Drive, Dickson City, Lackawanna County, Pennsylvania, an area affected by the siting and construction of the proposed transmission line.
2. Petitioner's interest is similar to other residents of Dickson City and Lackawanna County whose interests are not being represented in this proceeding.
3. Petitioner has a direct and substantial interest in PPL's application for siting and construction of a 500kV Transmission Line that will not be adequately represented by any other party and may be affected by any Commission determination made in connection with these proceedings. It is in the public interest to allow Petitioner to intervene in this proceeding.
4. The Application does not adequately address the availability of reasonable alternative routes and whether the proposed route is the best of all potential alternative routes; nor does the Petition adequately address the need for increased electric transmission lines in Lackawanna County.
5. The Application does not adequately address the safety of the proposed transmission lines; the impact and the efforts which have been and will be made to minimize the impact, if any, of the proposed transmission lines upon land use, soil and sedimentation particularly in Dickson City and Lackawanna County, terrain, hydrology, landscape, archeologic areas, geologic areas, and wilderness areas. It is in the public interest to allow Petitioner to intervene in this proceeding.
6. The Application does not address compliance with local government laws and regulations and planning and zoning requirements and the environmental implications upon the local communities and its residents.
7. The Application describes Large Segment 2 as a line section which parallels an existing 230 kV double circuit line and will share the existing 325 feet right of way which will be located, in part, in Dickson City, Lackawanna County; the application does not adequately address the impact of having 76 structures added to the existing line in a parallel line structure.

8. The Application does not adequately address the method or manner of construction of the supporting foundations, borings involved, and the impact on underground mines, the intensity or flow of surface water and the overall impact on properties and residences in Lackawanna County.
9. The Application does not address the impact of Large Segment 2 on property values of home and businesses in this line segment.
10. The Application does not identify Large Segment 2 as having any load deliverability violations or transmission reliability criteria violations or electric reliability violations.
11. Petitioner has similar interests to other residents of Lackawanna County, Dickson City, and customers of PPL Electric.
12. Petitioner's intervention in this proceeding will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

WHEREFORE, Petitioners respectfully request that the Commission grant its Petition to Intervene with full party status in this proceeding.

Dated this 25<sup>th</sup> day of February 2009.

Respectfully submitted,

Attorney Donna Davis

P.O. Box 423

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570-489-2939

CERTIFICATE OF SERVICE

I hereby certify that I have this 26th day of February, 2009, served the forgoing Petition to Intervene upon the parties and or their counsel of record, by causing the same to be sent by first class mail postage prepaid, as follows:

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