



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Fax  
www.postschell.com

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John H. Isom

jisom@postschell.com  
717-612-6032 Direct  
717-731-1985 Fax  
File #: 2507/134402

March 4, 2009

BY HAND

James J. McNulty  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
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 the Pennsylvania Portion of The Proposed Susquehanna-Roseland 500 kV Transmission Line in Portions of Lackawanna, Luzerne, Monroe, Pike and Wayne Counties, Pennsylvania - A-2009-2082652**

**Petition of PPL Electric Utilities Corporation For A Finding That A Building To Shelter Equipment At The 500-230 kV Substation To Be Constructed In The Borough of Blakely, Lackawanna County, Pennsylvania is Reasonably Necessary For The Convenience Or Welfare Of The Public - A-2009-2082832**

**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 Right-Of-Way And Easement Over And Across The Lands Of The Property Owners Listed Below For The Proposed Susquehanna-Roseland 500 kV Transmission Line In Portions Of Lackawanna, Luzerne, Monroe, Pike and Wayne Counties, Pennsylvania Is Necessary or Proper For The Service, Accommodation, Convenience Or Safety Of The Public: A-2009-2088297; A-2009-2088337; A-2009-2088331; A-2009-2088327; A-2009-2088340; A-2009-2088357; A-2009-2088359; A-2009-2088315; A-2009-2088312; A-2009-2088360; A-2009-2088307; A-2009-2088310; A-2009-2088353**

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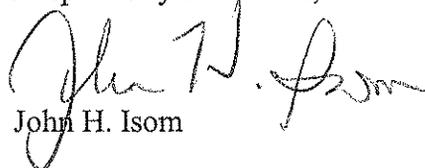
James J. McNulty, Secretary  
March 4, 2009  
Page 2

Dear Secretary McNulty:

Enclosed, for filing, is the Prehearing Conference Memorandum of PPL Electric Utilities Corporation in the above-referenced proceeding.

As indicated on the certificate of service, copies have been provided to the parties in the manner indicated.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "John H. Isom".

John H. Isom

JHI/jl

Enclosures

cc: Honorable Susan D. Colwell  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities Corporation	:	
Filed Pursuant to 52 Pa. Code Chapter 57,	:	A-2009-2082652
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	:	
Petition of PPL Electric Utilities Corporation	:	
For A Finding That A Building To Shelter	:	A-2009-2082832
Equipment At The 500-230 kV Substation To	:	
Be Constructed In The Borough of Blakely,	:	
Lackawanna 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 Right-Of-Way And Easement Over And Across	:	
The Lands Of The Property Owners Listed Below	:	
For The Proposed Susquehanna-Roseland 500 kV	:	
Transmission Line In Portions Of Lackawanna,	:	
Luzerne, Monroe, Pike and Wayne Counties,	:	
Pennsylvania Is Necessary or Proper For The	:	
Service, Accommodation, Convenience Or	:	
Safety Of The Public:	:	
	:	
Chaudari Family Limited Partnership,	:	A-2009-2088297
David Murphy, and Marguerite T. Kranick	:	
	:	
HaRa Corporation in Middle	:	A-2009-2088337
	:	
Max Bohleman	:	A-2009-2088331
	:	
Richard Coccodrilli, Jr., Jeffrey J.	:	A-2009-2088327
Coccodrilli, Ryan T. Coccodrilli, and	:	
Joseph Williams	:	
	:	
D&L Realty Company	:	A-2009-2088340

Randal W. Rowe, Sandy K. Rowe, and Germaine Michele Cole	:	A-2009-2088357
	:	
Kenneth Powell and Linda Powell	:	A-2009-2088359
Frank C. Bonacci and Marie E. Bonacci	:	A-2009-2088315
Rudolph Saporito and Maria Saporito	:	A-2009-2088312
David Murphy	:	A-2009-2088360
Anthony R. Domiano, Sr. and Anthony R. Domiano, Jr.	:	A-2009-2088307
	:	
Stafursky Properties, Ltd.	:	A-2009-2088310
Charles Coccodrilli	:	A-2009-2088353

### 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).

### VIA HAND DELIVERY

Dianne E. Dusman, Esquire  
Darryl Lawrence, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923

Charles Daniel Shields, Esquire  
Office of Trial Staff  
PO Box 3265  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
Harrisburg, PA 17105-3265

**VIA FEDERAL EXPRESS**

Paul M. Schmidt, Esquire  
Zarwin Baum DeVito Kaplan Schaer &  
Toddy P.C.  
1515 Market Street  
12<sup>th</sup> Floor  
Philadelphia, PA 19102-1981  
(Counsel for Saw Creek Estates Community  
Association, Inc.)

Lanzalotta & Associates LLC  
67 Royal Point Drive  
Moss Creek Plantation  
Hilton Head Island, SC 29926

Susan Simms Marsh, Esquire  
800 West Hershey Park Drive  
Hershey, PA 17033  
(Counsel for Pennsylvania American Water)

Edmund J. Berger, Esquire  
Berger Law Firm, P.C.  
2104 Market Street  
Camp Hill, PA 17011  
(Counsel for Energy Conservation Council)

Cheryl L. Hamilton, MD  
276 Saw Creek Estates  
Bushkill, PA 18324

Etianna M. Hyman  
576 Saw Creek Estates  
Bushkill, PA 18324

Joseph and Maria Doe  
2117 Fifth Street  
East Meadow, NY 11554  
(For 3134 Windgate Court  
Sawcreek Estates  
Bushkill, PA 18324)

Alix M. Mariette  
63 Wickes Road  
Bushkill, PA 18324

Beverly & Arthur Karten  
155 At The Falls  
Bushkill, PA 18324

Max Bohleman  
RR 1, Box 539C  
SR 247  
Olyphant, PA 18447

Angelica Rovira  
305 Woodville Court  
Lot 305, Section 21  
Saw Creek Estates  
Bushkill, PA 18324

Annette & Ralph Seeley  
52 Saw Creek Estates  
Bushkill, PA 18324

Richard Coccodrilli, Jr.  
Jeffrey J. Coccodrilli  
Ryan T. Coccodrilli  
Joseph Williams  
4 East Forest Drive  
Saylorsburg, PA 18353

Timothy and Debra Kocher  
1184 Ridge Road  
Bath, PA 18014

Sheryl A. Rosen  
668 Saw Creek Estates  
Bushkill, PA 18324

David Murphy and Marguerite T. Kranick  
279 Faller Road  
Lake Ariel, PA 18436

Chaudhari Family Limited Partnership  
1311 Delaware Street  
Dunmore, PA 18512

D&L Realty Company  
400 Mill Street  
Dunmore, PA 18512

Joseph S. Wiesmeth, Esquire  
919 Main Street  
Stroudsburg, PA 18360  
(Counsel for Winona Lakes Property  
Owners Association)

Kenneth Powell and Linda Powell  
1305 Justus Boulevard  
Clarks Summit, PA 18411

Arlean K. Lilly  
1260 Smith Gap Road  
Bath, PA 18014-8738

Joseph Dominguez  
Exelon Generation  
300 Exelon Way, Suite 340  
Kennett Square, PA 19348

Shelby A. Linton-Keddie  
McNees Wallace & Nurick, LLC  
P.O. Box 1166  
100 Pine Street  
Harrisburg, PA 17108-1166

Kent D. Murphy  
Senior Counsel  
UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406

Partick J. Lavelle  
1000 S. State Street  
Clarks Summit, PA 18411

Diane and Larry Berger  
205 Princeton Place  
Williamstown, NJ 08094

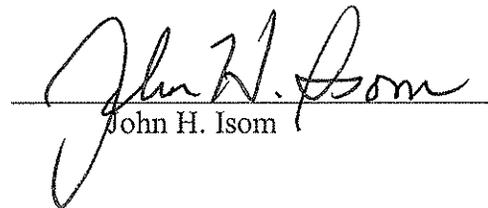
**U.S. POSTAL SERVICE  
EXPRESS MAIL**

Donna Davis, Esquire  
PO Box 423  
Dunmore, PA 18512

Rudolph Saporito and Maria Saporito  
PO Box 434  
Lake Ariel, PA 18436-0434

HaRa Corporation  
c/o F. Andrew Wolf, Corporate Counsel  
Bushkill Group  
Route 209  
PO Box 447  
Bushkill, PA 18324

Date: March 4, 2009

  
John H. Isom

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities Corporation	:	
Filed Pursuant to 52 Pa. Code Chapter 57,	:	A-2009-2082652
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	:	
Petition of PPL Electric Utilities Corporation	:	
For A Finding That A Building To Shelter	:	A-2009-2082832
Equipment At The 500-230 kV Substation To	:	
Be Constructed In The Borough of Blakely,	:	
Lackawanna 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 Right-Of-Way And Easement Over And Across	:	
The Lands Of The Property Owners Listed Below	:	
For The Proposed Susquehanna-Roseland 500 kV	:	
Transmission Line In Portions Of Lackawanna,	:	
Luzerne, Monroe, Pike and Wayne Counties,	:	
Pennsylvania Is Necessary or Proper For The	:	
Service, Accommodation, Convenience Or	:	
Safety Of The Public:	:	
	:	
Chaudari Family Limited Partnership,	:	A-2009-2088297
David Murphy, and Marguerite T. Kranick	:	
	:	
HaRa Corporation	:	A-2009-2088337
	:	
Max Bohleman	:	A-2009-2088331
	:	
Richard Coccodrilli, Jr., Jeffrey J.	:	A-2009-2088327
Coccodrilli, Ryan T. Coccodrilli, and	:	
Joseph Williams	:	
	:	
D&L Realty Company	:	A-2009-2088340
	:	
Randal W. Rowe, Sandy K. Rowe, and	:	A-2009-2088357

Germaine Michele Cole	:	
Kenneth Powell and Linda Powell	:	A-2009-2088359
Frank C. Bonacci and Marie E. Bonacci	:	A-2009-2088315
Rudolph Saporito and Maria Saporito	:	A-2009-2088312
David Murphy	:	A-2009-2088360
Anthony R. Domiano, Sr. and Anthony R. Domiano, Jr.	:	A-2009-2088307
Stafursky Properties, Ltd.	:	A-2009-2088310
Charles Coccodrilli	:	A-2009-2088353

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**PREHEARING CONFERENCE MEMORANDUM OF  
PPL ELECTRIC UTILITIES CORPORATION**

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**TO ADMINISTRATIVE LAW JUDGE SUSAN D. COLWELL:**

PPL Electric Utilities Corporation (“PPL Electric”) hereby submits this Prehearing Conference Memorandum.

**I. SERVICE OF DOCUMENTS**

1. PPL Electric requests that all documents be served on:

John H. Isom  
Post & Schell, PC  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[jisom@postschell.com](mailto:jisom@postschell.com)

PPL Electric agrees to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies be served upon Paul E. Russell at [perussell@pplweb.com](mailto:perussell@pplweb.com), David B. MacGregor at [dmacgregor@postschell.com](mailto:dmacgregor@postschell.com),

Andrew S. Tubbs at [atubbs@postschell.com](mailto:atubbs@postschell.com), and Christopher T. Wright at [cwright@postschell.com](mailto:cwright@postschell.com).

## II. PROCEDURAL HISTORY.

2. This proceeding was initiated on January 6, 2009, when 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 the Pennsylvania Portion of The Proposed Susquehanna-Roseland 500 kV Transmission Line in Portions of Lackawanna, Luzerne, Monroe, Pike and Wayne Counties,” which was docketed at Docket No. A-2009-208652 (“Siting Application”).

3. PPL Electric also filed on January 6, 2009 the “Petition of PPL Electric Utilities Corporation For A Finding That A Building To Shelter Equipment At The 500-230 kV Substation To Be Constructed In The Borough of Blakely, Lackawanna County, Pennsylvania is Reasonably Necessary For The Convenience Or Welfare Of The Public,” which was docketed at Docket No. A-2009-2082832 (“Zoning Petition”).

4. On January 12, 2009, the Office of Consumer Advocate filed a Notice of Intervention and Public Statement.

5. On January 12, 2009, Administrative Law Judge Susan D. Colwell issued the First Prehearing Order.

6. Pursuant to an Interim Order issued by Administrative Law Judge Veronica A. Smith on January 14, 2009, the complaints of Sheryl A. Rosen, Beverly and Arthur Karten, and Alix M. Mariete, at Docket Nos. C-2008-2080322, C-2008-2075542, and C-2008-2077943 respectively, were assigned to be treated as protests to the Siting Application.

7. On January 15, 2009, a protests were filed by Etianna M. Hyman, Cheryl L. Hamilton, Angelica Rovira, and Arlean K. Lilly.

8. On January 16, 2009, the Office of Trial Staff entered an appearance.

9. On January 16, 2009, protests were filed by Timothy Kocher, Debra Kocher, Joseph K. Doe, Maria Doe, Annette Seeley, and Ralph Seeley.

10. On January 20, the Office of Consumer Advocate entered an appearance.

11. On January 23, 2009, Paul M. Schmidt entered an appearance on behalf of Saw Creek Estates.

12. On January 26, 2009, PPL Electric served the following Direct Testimony:

- a. PPL Electric St. No. 1 – Gregory J. Smith;
- b. PPL Electric St. No. 2 – Kenneth B. Kuhns;
- c. PPL Electric St. No. 3 – Peter Sparhawk;
- d. PPL Electric St. No. 4 – Stephen A. Olinick;
- e. PPL Electric St. No. 5 – Jay A. Keeler;
- f. PPL Electric St. No. 6 – Patrick J. McMackin;
- g. PPL Electric St. No. 7 – Steven R. Herling;
- h. PPL Electric St. No. 8 – Paul McGlynn;
- i. PPL Electric St. No. 9 – John M. Reynolds;
- j. PPL Electric St. No. 10 – Robert J. Farley;
- k. PPL Electric St. No. 11 – Joseph M. Kleha;
- l. PPL Electric St. No. 12 – Stephen A. Olinick; and
- m. PPL Electric St. No. 13 – Kenneth B. Kuhns.

13. On January 27, 2009, the Office of Consumer Advocate filed a Protest to the Siting Application and Zoning Petition.

14. On January 28, 2009, PPL Electric filed thirteen (13) Applications 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 Right-Of-Way And Easement Over And Across The Lands Of The Property Owners Listed Below For The Proposed Susquehanna-Roseland 500 kV Transmission Line In Portions Of Lackawanna, Luzerne, Monroe, Pike and Wayne Counties, Pennsylvania Is Necessary or Proper For The Service, Accommodation, Convenience Or Safety Of The Public (hereinafter, collective “Condemnation Applications”):

- a. Chaudari Family Limited Partnership, David Murphy, and Marguerite T. Kranick, Doc. No. A-2009-2088297;
- b. HaRa Corporation, Doc. No. A-2009-2088337;
- c. Max Bohleman, Doc. No. A-2009-2088331;
- d. Richard Coccodrilli, Jr., Jeffrey J. Coccodrilli, Ryan T. Coccodrilli, and Joseph Williams, Doc. No. A-2009-2088327;
- e. D&L Realty Company, Doc. No. A-2009-2088340;
- f. Randal W. Rowe, Sandy K. Rowe, and Germaine Michele Cole, Doc. No. A-2009-2088357;
- g. Kenneth Powell and Linda Powell, Doc. No. A-2009-2088359;
- h. Frank C. Bonacci and Marie E. Bonacci, Doc. No. A-2009-2088315;
- i. Rudolph Saporito and Maria Saporito, Doc. No. A-2009-2088312;
- j. David Murphy, Doc. No. A-2009-2088360;
- k. Anthony R. Domiano, Sr. and Anthony R. Domiano, Jr., Doc. No. A-2009-2088307;
- l. Stafursky Properties, Ltd., Doc. No. A-2009-2088310; and
- m. Charles Coccodrilli, Doc. No. A-2009-2088353.

15. On February 2, 2009, PPL Electric served a Revised Statement No. 3 – direct testimony of Peter Sparhawk.

16. On February 5, 2009, the Office of Trial Staff filed a Petition to Intervene.

17. On February 6, 2009, Administrative Law Judge Colwell issued a Second Prehearing Order that, *inter alia*, consolidated the Siting Application, Zoning Petition, and the thirteen (13) Condemnation Applications.

18. On February 9, 2009, a Secretarial Letter was issued explaining party status and requesting attendance at the March 6, 2009 Prehearing Conference for the following Protestants:

- a. Annette and Ralph Seeley;
- b. Joseph K. Doe;
- c. Timothy and Debra Kocher;
- d. Maria Doe;
- e. Etianna M. Hyman;
- f. Cheryl L. Hamilton;
- g. Angelica Rovira; and
- h. Arlean K. Lilly.

19. On February 11, 2009, UGI Utilities, Inc. filed a Petition to Intervene.

20. On February 13, 2009, PPL Electric filed a Petition to withdraw the Condemnation Application for of the property of Anthony R. Domiano, Sr. and Anthony R. Domiano, Jr., Doc. No. A-2009-2088307.

21. On February 20, 2009, Diane and Larry Berger filed a Protest to the Siting Application.

22. On February 25, 2009, Donna Davis filed a Petition to Intervene.

23. On February 26, 2009, D. Scott and Patrice Amity Hann filed a Protest to the Siting Application.

24. On February 26, 2009, Exelon Corporation filed a Petition to Intervene.

25. On February 26, 2009, Saw Creek Estates Community Association, Inc. filed a Protest to Siting Application and Zoning Petition.

26. On February 27, 2009, Energy Conservation Council of Pennsylvania filed a Protest to the above-captioned consolidated proceedings.

27. On February 27, 2009, Pennsylvania-American Water Company filed a Petition to Intervene.

28. On February 27, 2009, Donna Davis filed a Protest to the Siting Application.

29. On February 27, 2009, PP&L Customer Alliance filed a Petition to Intervene.

30. On February 27, 2009, Winona Lakes Property Association filed a Petition to Intervene.

31. On March 2, 2009, PPL Electric filed Petitions to withdraw the following four (4) Condemnation Applications:

a. Stafursky Properties, Ltd., Doc. No. A-2009-2088310;

b. Frank C. Bonacci and Marie E. Bonacci, Doc. No. A-2009-2088315;

c. Randal W. Rowe, Sandy K. Rowe, and Germaine Michele Cole, Doc. No. A-2009-2088357; and

d. Charles Coccodrilli, Doc. No. A-2009-2088353.

32. On March 4, 2009, PPL Electric served the Direct Testimony PPL Electric Statement Nos. 14 through 21 – Robert J. Farley, relating to the Condemnation Applications.

### III. ISSUES.

33. PPL Electric intends to demonstrate that the proposed siting and construction of the Susquehanna-Roseland 500 kV Transmission Line in portions of Lackawanna, Luzerne, Monroe, Pike And Wayne Counties, Pennsylvania is reasonably necessary in order for to resolve numerous violations of mandatory reliability standards established by the North American Electric Reliability Corporation and to ensure reliable long-term electric service to customers within the area served by the PJM Interconnection, LLC, including the approximately 1.4 million customers served by PPL Electric. PPL Electric also will demonstrate that Susquehanna-Roseland 500 kV Transmission Line will provide several additional benefits to customers served by PJM and PPL Electric, including replacement of antiquated facilities, reduced congestion costs, improvement of voltage levels, and elimination of existing stability limits on certain generation output. On these bases, PPL Electric will request that the ALJ and the Commission approve the siting and construction of the proposed transmission line.

34. PPL Electric intends to demonstrate that the proposed route for the project was selected after extensive public input and a detailed analysis, which included a comprehensive environmental inventory, identification and analysis of alternative routes, and selection of the preferred route. PPL Electric identified and compared route alternatives based upon a detailed analysis of comments from the public, societal concerns, environmental impacts, engineering considerations and cost. PPL Electric intends to demonstrate that the preferred route for the Susquehanna-Roseland 500 kV Transmission Line was selected over the alternative routes because it makes the best use of existing transmission line structures, existing transmission lines corridors, and existing rights-of-way, which will minimize environmental impacts, social impacts and cost.

35. PPL Electric intends to demonstrate that the construction of the proposed substation, including the control equipment building, in the Blakely Borough is necessary for the service, accommodation, convenience, or safety of the public, and is consistent with Blakely Borough's zoning ordinance. PPL Electric also intends to demonstrate that it will consider and adopt all reasonable suggestions from local governments, including the Borough of Blakely, to the extent that they can be implemented at a reasonable cost and that they do not interfere with the construction or effective operation of the proposed facilities.

36. PPL Electric intends to demonstrate that its proposed exercise of the power of eminent domain to acquire rights-of-way and easements for the construction, operation and maintenance of the proposed Susquehanna-Roseland 500 kV Transmission Line over the lands identified in the Condemnation Applications is necessary for the service, accommodation, convenience, or safety of the public. The route of the proposed Susquehanna-Roseland 500 kV Transmission Line crosses the tracts of land identified in the Condemnation Applications. The service to be furnished by PPL Electric through the proposed and related facilities is necessary or proper to resolve numerous violations of mandatory reliability standards established by the North American Electric Reliability Corporation and to ensure reliable long-term electric service to customers within the area served by the PJM Interconnection, LLC, including the approximately 1.4 million customers served by PPL Electric. On these bases, PPL Electric will request that the ALJ and the Commission approve PPL Electric's proposed exercise of the power of eminent domain to acquire rights-of-way for the proposed Susquehanna-Roseland 500 kV Transmission Line over the lands identified in the Condemnation Applications.

#### IV. WITNESSES.

37. PPL Electric intends to present the following statements, in its case-in-chief, in support of the above-captioned Applications:

- a. PPL Electric St. No. 1 – Gregory J. Smith;
- b. PPL Electric St. No. 2 – Kenneth B. Kuhns;
- c. PPL Electric St. No. 3 – Peter Sparhawk;
- d. PPL Electric St. No. 4 – Stephen A. Olinick;
- e. PPL Electric St. No. 5 – Jay A. Keeler;
- f. PPL Electric St. No. 6 – Patrick J. McMackin;
- g. PPL Electric St. No. 7 – Steven R. Herling;
- h. PPL Electric St. No. 8 – Paul McGlynn;
- i. PPL Electric St. No. 9 – John M. Reynolds;
- j. PPL Electric St. No. 10 – Robert J. Farley;
- k. PPL Electric St. No. 11 – Joseph M. Kleha;
- l. PPL Electric St. No. 12 – Stephen A. Olinick;
- m. PPL Electric St. No. 13 – Kenneth B. Kuhns; and
- n. PPL Electric St. Nos. 14-21 – Robert J. Farley.

PPL Electric has previously filed copies of these statements.

38. PPL Electric also is currently preparing brief supplemental direct testimony of two witnesses which will explain a minor rerouting of approximately 3 miles of the Susquehanna-Roseland transmission line in Archbald Borough, Lackawanna County, Pennsylvania. The rerouted portion of the line runs east along the north side of Pennsylvania Route 6 for most of its length until it turns north to rejoin the original route. The testimony will explain the rerouting and benefits, which include increased use of existing property rights of PPL Electric, reduced use of state game lands, reduced interference with owners' intended use of their

lands, and avoidance of three condemnation proceedings related to tracts of land where the owners had declined to sell rights-of-way to PPL Electric.<sup>1</sup> This testimony, together with approximately three revised maps showing the new route, will be provided to the ALJ and the parties on or before March 10, 2009.

39. PPL Electric also reserves the right to call additional witnesses to address any issues that may arise during the course of the proceeding.

**V. DISCOVERY**

40. To date, the Office of Consumer Advocate and Office of Trial Staff have served interrogatories on PPL Electric. Based on the nature and scope of these interrogatories, PPL Electric does not believe that any change or modification in the standard timelines for discovery set forth in the Commission’s regulations is necessary or appropriate.

**VI. LITIGATION SCHEDULE.**

41. PPL Electric proposes the following schedule for resolution of this proceeding, which has been agreed to by many of the parties:

Public Input Hearings	March 20, 2009, 1:00 and 7:00 PM May 1-19, 2009 (if necessary)
Other Parties' Direct	May 29, 2009
Rebuttal	June 30, 2009
Surrebuttal	July 15, 2009
Evidentiary Hearings	Week of July 20-24, 2009

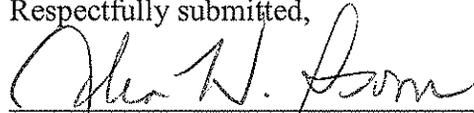
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<sup>1</sup> On March 2, 2009, PPL Electric filed Petitions to withdraw the following four (3) Condemnation Applications as a result of the above-mentioned rerouting:

- a. Stafursky Properties, Ltd., Doc. No. A-2009-2088310;
- b. Frank C. Bonacci and Marie E. Bonacci, Doc. No. A-2009-2088315; and
- c. Randal W. Rowe, Sandy K. Rowe, and Germaine Michele Cole, Doc. No. A-2009-2088357.

Initial Briefs August 24, 2009  
Reply Briefs September 4, 2009  
Recommended Decision October 19, 2009  
Exceptions November 2, 2009  
Reply Exceptions November 10, 2009  
Commission Order January 2010

Respectfully submitted,



David B. MacGregor (ID # 28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Phone: 215-587-1197  
Fax: 215-587-1444  
E-mail: dmacgregor@postschell.com

John H. Isom (ID # 16569)  
Andrew. S. Tubbs (ID # 80310)  
Christopher T. Wright (ID # 203412)  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
Phone: 717-731-1970  
Fax: 717-731-1985  
E-mail: jisom@postschell.com  
atubbs@postschell.com  
cwright@postschell.com

Paul E. Russell (ID # 21643)  
Associate General Counsel  
PPL Services Corporation  
Office of General Counsel  
Two North Ninth Street  
Allentown, PA 18106  
Phone: 610-774-4254  
Fax: 610-774-6726  
E-mail: perussell@pplweb.com

Of Counsel:

Post & Schell, P.C.

Date: March 4, 2009

Attorneys for PPL Electric Utilities Corporation