



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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Christopher T. Wright

cwright@postschell.com  
717-612-6013 Direct  
717-731-1985 Fax  
File #: 2507/140068

March 13, 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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Dear Secretary McNulty:

ALLENTOWN HARRISBURG LANCASTER PHILADELPHIA PITTSBURGH PRINCETON WASHINGTON, D.C.

A PENNSYLVANIA PROFESSIONAL CORPORATION

6333969v1

James J. McNulty, Secretary  
March 13, 2009  
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Enclosed for filing is the Answer of PPL Electric Utilities Corporation to the Protest of the Office of Consumer Advocate in the above-referenced proceeding.

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

Respectfully yours,



Christopher T. Wright

CTW/skr

Enclosures

cc: 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 (relating to service by a participant).

### VIA E-MAIL AND FIRST CLASS MAIL

Dianne E. Dusman, Esquire  
Darryl Lawrence, Esquire  
Shaun A. Sparks, 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

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.)

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

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

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

### VIA FIRST CLASS MAIL

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)

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

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

Diane and Larry Berger  
205 Princeton Place  
Williamstown, NJ 08094

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 13, 2009



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Christopher T. Wright

**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

Kenneth Powell and Linda Powell : A-2009-2088359  
Rudolph Saporito and Maria Saporito : A-2009-2088312  
David Murphy : A-2009-2088360

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**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION  
TO THE PROTEST OF THE OFFICE OF CONSUMER ADVOCATE**

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

PPL Electric Utilities Corporation (“PPL Electric”), by and through its attorneys, files this Answer to the Protest of the Office of Consumer Advocate (“OCA”). Although the Regulations of the Pennsylvania Public Utility Commission (“Commission”) do not require an answer to a protest, PPL Electric responds to each of the separately-numbered paragraphs of OCA’s Protest as follows:

1. Admitted in part and denied in part. It is admitted that the Protestant is Irwin A. Popowsky, Consumer Advocate of Pennsylvania. The remaining averments set forth in Paragraph 1 of OCA’s Protest are legal conclusions to which no responsive pleading is required.
2. Admitted.
3. Admitted in part and denied in part. It is admitted that PPL Electric’s transmission system is operated as part of the PJM Interconnection, LLC (“PJM”), which has been designated by the Federal Energy Regulatory Commission (“FERC”) as the Regional Transmission Organization (“RTO”) of the transmission systems of electric utilities in the region that includes PPL Electric’s service territory. It is also admitted that PPL Electric has been directed by PJM to construct the Pennsylvania portion of the 500 kV Susquehanna-Roseland

electric transmission line (“Susquehanna-Roseland 500 kV Transmission Line”) with an in-service date of June 1, 2012. The remainder of the averments of Paragraph 3 of OCA’s Protest is a statement of OCA’s subjective intent in filing the Protests. As such, it is not an averment of fact to which a responsive pleading is required.

4. Admitted in part and denied in part. It is admitted that the entirety of the proposed Susquehanna-Roseland 500 kV Transmission Line is located in the Department of Energy’s designated Mid-Atlantic Area National Interest Electric Transmission Corridor. However, the remainder of the averments set forth in Paragraph 4 of OCA’s Protest are legal conclusions to which no responsive pleading is required.

5. The averments set forth in Paragraph 5 of OCA’s Protest are legal conclusions to which no responsive pleading is required.

6. The averments set forth in Paragraph 6 of OCA’s Protest relate to or reference a regulation, the terms of which speak for themselves. Any interpretation, characterization, or quotation thereof is denied. By way of further response, the averments set forth in Paragraph 6 of OCA’s Protest are legal conclusions to which no responsive pleading is required.

7. The averments set forth in Paragraph 7 of OCA’s Protest are legal conclusions to which no responsive pleading is required. To the extent a response is deemed necessary, PPL Electric denies the same. By way of further response, Sections 1102 and 1103 of the Public Utility Code relate to applications for certificates of public convenience. Such certificates, however, are not required for the siting and construction of transmission lines.

8. The averments set forth in Paragraph 8 of OCA’s Protest relate to or reference provisions of the Pennsylvania Public Utility Code, the terms of which speak for themselves. Any interpretation, characterization, or quotation thereof is denied. By way of further response,

the averments set forth in Paragraph 8 of OCA's Protest are legal conclusions to which no responsive pleading is required. Further, in these consolidated proceedings, PPL Electric has proposed none of the actions for which a certificate of public convenience is required.

9. The averments set forth in Paragraph 9 of OCA's Protest relate to or reference provisions of the Pennsylvania Public Utility Code, the terms of which speak for themselves. Any interpretation, characterization, or quotation thereof is denied. By way of further response, the averments set forth in Paragraph 9 of OCA's Protest are legal conclusions to which no responsive pleading is required. Further, in these consolidated proceedings, PPL Electric has proposed none of the actions for which a certificate of public convenience is required.

10. The averments set forth in Paragraph 10 of OCA's Protest are legal conclusions and requests for relief to which no responsive pleading is required. By way of further response, OCA has failed to identify in its Protest any facts or grounds to support the protest. Notwithstanding the foregoing, PPL Electric does not oppose OCA's participation in these proceedings.

The remainder of OCA's Protest is a request for relief to which no responsive pleading is required.

Respectfully submitted,

  
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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 13, 2009

Attorneys for PPL Electric Utilities Corporation