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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

Dear Secretary McNulty:

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

A PENNSYLVANIA PROFESSIONAL CORPORATION

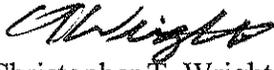
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James J. McNulty, Secretary
March 13, 2009
Page 2

Enclosed for filing is the Answer of PPL Electric Utilities Corporation to the Protest of Saw Creek Estates Community Associate, Inc. 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).

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Bushkill, PA 18324

Date: March 13, 2009



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

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION
TO THE PROTEST OF SAW CREEK ESTATES COMMUNITY ASSOCIATION, INC.**

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 Saw Creek Estates Community Association, Inc. (“Saw Creek”). 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 Saw Creek’s Protest as follows:

1. Admitted.
2. Admitted.
3. Denied. Information regarding Saw Creek’s membership is not reasonably available to PPL Electric and, therefore, PPL Electric denies the same.
4. Denied. Saw Creek has alleged in Paragraph 3 of its Protest that there are “approximately 3000 families owning and residing in single-family homes in the Saw Creek Estates.” PPL Electric specifically denies that “Saw Creek Estates and its members are located *immediately adjacent* to a segment of the proposed Susquehanna-Roseland Line,” and demands strict proof thereof.

5. Denied. The averments set forth in Paragraph 5 of Saw Creek's Protests relate to or reference the Pennsylvania Public Utility Code and the regulations of the Pennsylvania Public Utility Commission ("Commission"), the terms of which speak for themselves. Any interpretation or characterization thereof is denied. By way of further response, the averments set forth in Paragraph 5 of Saw Creek'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.

6. Denied. PPL Electric denies that the proposed Susquehanna-Roseland 500 kV Transmission Line will cause the harms alleged in Paragraph 6 of Saw Creek's Protest. By way of further response, the Susquehanna-Roseland 500 kV Transmission Line will be designed and constructed to meet or exceed the National Electrical Safety Code ("NESC"). The Commission has found that transmission lines that meet or exceed the NESC requirements do not create an unreasonable risk of danger to the health and safety of the public. *See Application of PP&L for Approval to Locate and Construct a 138 kV Transmission Line Between West Allentown and Salisbury Substations*, Doc. No. A-00104160 (July 20, 1984); *Application of PP&L for Authorization to Locate and Construct its Hamlin 138 kV Electric Transmission Line*, Doc. No. A-00101826 (April 3, 1981); *Larken v. Philadelphia Electric Co.*, 39 Pa. P.U.C. 777 (1961). Further, PPL Electric has adopted a Magnetic Field Management Program under which PPL Electric's policy is to reverse phase transmission lines and increase pole heights where it is practical and reasonable to do so. Said program has been previously approved by the Commission. *See Certification Application of Pennsylvania Power & Light Co. filed Pursuant to 52 Pa. Code Chapters 57*, 1994 Pa. PUC LEXIS 65, *67-*69 (October 21, 1994). Further,

PPL Electric has adopted a vegetation management program which safeguards the public from improper uses of herbicides.

7. Denied. The averments set forth in Paragraph 7 of Saw Creek'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, 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. PPL Electric has been directed by PJM to construct the Pennsylvania portion of the Susquehanna-Roseland 500 kV Transmission Line. The purpose of the Susquehanna-Roseland 500 kV Transmission Line is to resolve numerous violations of mandatory reliability standards and to ensure reliable long-term electric service to customers within the PJM control area, including the approximately 1.4 million retail customers served by PPL Electric. The Susquehanna-Roseland 500 kV Transmission Line also will provide other important benefits to PJM, PPL Electric, and the customers they serve.

8. Denied. In accordance with the Commission's regulations at 52 Pa. Code § 57.72(c), PPL Electric considered all reasonable alternative routes and conducted an extensive, multi-faceted analysis to determine the preferred route and design for the Pennsylvania portion of the Susquehanna-Roseland Line. PPL Electric denies that constructing a 500 kV transmission line underground in an existing right-of-way that predates the Saw Creek Estates development is reasonable.

9. Denied. PPL Electric denies that the proposed Susquehanna-Roseland 500 kV Transmission Line creates unreasonable risks to the health and safety of the residents of Saw

Creek. By way of further response, PPL Electric incorporates Paragraph 6, *supra*, as if fully set forth herein.

10. Denied. The averments set forth in Paragraph 10 of Saw Creek'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, in deciding to site and construct the Susquehanna-Roseland 500 kV Transmission Line, PPL Electric and/or PJM considered the environmental impact of the project, the electric power needs of the public, the state of available technology, and the available alternatives.

11. Denied. The averments set forth in Paragraph 11 of Saw Creek'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, PPL Electric strives to achieve an optimal balance of many competing factors in siting a transmission line, including: minimizing impacts on the environment, avoiding population centers, minimizing cost, avoiding historic and cultural sites, using existing linear features, protecting public and employee safety, minimizing impacts on land use, minimizing impacts on scenic areas, avoiding scenic rivers, and others. Further, PPL Electric will take reasonable steps to minimize any adverse impacts of the Susquehanna-Roseland 500 kV Transmission Line.

12. Denied. PPL Electric strives to achieve an optimal balance of many competing factors in siting a transmission line, including: minimizing impacts on the environment, avoiding population centers, minimizing cost, avoiding historic and cultural sites, using existing linear features, protecting public and employee safety, minimizing impacts on land use, minimizing impacts on scenic areas, avoiding scenic rivers, and others. Further, PPL Electric

will take reasonable steps to minimize any adverse impacts of the Susquehanna-Roseland 500 kV Transmission Line.

13. Denied. The averments set forth in Paragraph 13 of Saw Creek'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, PPL Electric strives to achieve an optimal balance of many competing factors in siting a transmission line, including: minimizing impacts on the environment, avoiding population centers, minimizing cost, avoiding historic and cultural sites, using existing linear features, protecting public and employee safety, minimizing impacts on land use, minimizing impacts on scenic areas, avoiding scenic rivers, and others. Further, PPL Electric will take reasonable steps to minimize any adverse impacts of the Susquehanna-Roseland 500 kV Transmission Line.

14. Denied. In accordance with the Commission's regulations at 52 Pa. Code § 57.72(c), PPL Electric conducted an extensive, multi-faceted analysis to locate and identify archaeological, geographic, historic, scenic, and wilderness areas within 2 miles of the Susquehanna-Roseland 500 kV Transmission Line route.

15. Denied. The averments set forth in Paragraph 15 of Saw Creek'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, in accordance with the Commission's regulations at 52 Pa. Code § 57.72(c), PPL Electric conducted an extensive, multi-faceted analysis to determine the preferred route for the Pennsylvania portion of the Susquehanna-Roseland Line.

16. Denied. By way of further response, PPL Electric incorporates by reference Paragraphs 6, 9, and 12, *supra*, as if fully set forth herein.

17. Denied. In accordance with the Commission's regulations at 52 Pa. Code § 57.72(c), PPL Electric considered all reasonable alternative routes and conducted an extensive, multi-faceted analysis to determine the preferred route for the Pennsylvania portion of the Susquehanna-Roseland Line.

18. Denied. PPL Electric incorporates by reference Paragraph 12, *supra*, as if fully set forth herein.

19. Denied. The estimated cost to construct the Pennsylvania portion of the Susquehanna-Roseland 500 kV transmission line is approximately \$510 million.

20. Denied. The Commission's regulations do not provide a protestant with the right to "supplement" a protest with "additional issues." To the contrary, the Commission's regulations require a protest to set out clearly and concisely the facts and grounds supporting the protest. *See* 52 Pa. Code § 5.52.

21. Admitted.

22. Denied. The averments set forth in Paragraph 22 of Saw Creek's Protest are legal conclusions and a prayer for relief to which no responsive pleading is required. To the extent a response is deemed necessary, PPL Electric denies the same.

WHEREFORE, PPL Electric Utilities Corporation does not oppose Saw Creek's participation, and respectfully requests that any such participation be limited solely to the issues raised in the above-captioned applications.

Respectfully submitted,


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Date: March 13, 2009

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