

Springfield *bucks* Undesirable Land Use

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Thursday, Friday, March 20, 2009

Re: Application of PPL- Docket No. A-2008-2022941
Replies of PPL Electric Utilities Corporation (PPL) to Exceptions of Other Parties.

Board of Directors

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Dear Commissioners:

Please consider our response to PPL's Replies to exceptions of other parties, which follows.

Overview, page 2: PPL states: *"Every transmission line has adverse impacts. Therefore, the identification of some adverse effects proves nothing."*

Reply: This statement illustrates PPL's callous lack of concern for environmental impacts. Independent experts note that the Cross Country Route would irreversibly divide and degrade a unique and functional riparian corridor:

*"Construction of the Cross Country Route will destroy or degrade several miles of intact riparian and upland forest within the Tohickon Creek watershed."*¹

*"Because so much of the proposed PPL "Cross Country" corridor lies along the Tohickon 5 Creek and its headwaters tributaries, the potential for damage to stream ecosystems through deforestation of the riparian zone is great."*²

While the SEPTA and 309 Corridors would have effects in the same watershed region, the effects would be along the periphery, which is already degraded and commercial in character. That PPL fails to recognize these clear and significant differences calls into question other aspects of its application.

*"Many of the suggested impacts asserted by PPL are significantly inflated as both Route 309 and the SEPTA Route already possess extensively impacted areas that will not be disturbed further."*³

¹ Letter to Kenneth Kuhn (PPL) from PA DEP, May 8, 2008

² DIRECT TESTIMONY AND EXHIBITS OF ANN F. RHOADS Ph.D., August 18, 2008

³ Direct Testimony and Exhibits of Mark Gallagher, Vice President of Princeton Hydro, August 18, 2008

Overview, page 2: PPL states: “*Other parties’ criticize PPL’s decision to construct the Coopersburg Tap in more open, less developed areas. Such criticisms, however, are unwarranted. Unless the owner agrees, PPL Electric is prohibited from building transmission lines within the curtilage of a residence which can extend 100 meters from the residence. As a result, PPL Electric has no choice but to build transmission lines in less developed areas.*” (Emphasis added.)

Reply: This statement about “*no choice*” conflicts with the PPL’s stated objectives of minimizing environmental impacts, and PUC guidelines on siting transmission line infrastructure. If accepted, it would be a formula for the carving up of intact and endangered environments in our State. It also appears speculative in that we must accept PPL’s opinion without evidence, because to our knowledge the residents along the alternative routes were never asked. We don’t know, for example, if residents in the more commercial 309 or SEPTA corridors would be happy to receive compensation for easements. Furthermore, if PPL’s statement is true, it implies that the utility company can select alternatives that are not feasible in order to guarantee that its preference will be approved – a way to manipulate the application process. Finally, this statement fails to explain to the public how transmission line infrastructure could ever be added to any congested metropolitan regions in our State.

ARGUMENT - Springfield’s Exceptions are without Merit and should be rejected, page 3: PPL states: (1) “*The only “benefit” of the Springfield Functional Configuration [SFC] is that it is not located in Springfield Township.* (2) *The proposed location of the substation in the PPL Electric Functional Configuration is ideal in that it is located central the load which it intends to serve.*”

Reply: (1) The *benefit* of the SFC, as we understand it, is that it meets the expected load needs –which PJM says is in decline because of the economic crisis⁴ – without any significant environment impacts on a valued intact watershed environment.

(2) PPL’s “ideal” substation site, unfortunately, is a known flood zone, representing unknown increased risk of flooding in the region. This rural area also has very narrow roadways, which may require widening to accommodate utility vehicles, representing unknown future costs to consumers and risks to residents.

Furthermore, the Hickon Road siting of a 7-acre substation will degrade the rural character of Bucks County, which, is famous worldwide for its rural beauty and historic character.

Remarkably, PPL has not provided any alternative substation sites, despite the availability of suitable commercial properties in Springfield Township, such as the Truck depot on route 309, which intersects HV lines from Hosensack.

“I have not found any reports that review the various substation alternatives side-by-side and consider their relative 3 environmental impacts.”⁵

⁴ PJM Load Forecast Report, January 2009

⁵ Direct Testimony and Exhibits of Mark Gallagher, Vice President of Princeton Hydro, August 18, 2008

In conclusion, PPL's application should be rejected because it has not fairly presented the alternatives or exercised due diligence in its analysis. For example, PPL argues that the alternatives (it selected) are not feasible; it cites engineering challenges when rejecting the SEPTA corridor, which is not supported by the testimony of SEPTA⁶; it severely understates the environmental impacts of its preferred route despite consistent testimony to the contrary by respected experts. Most importantly, it has selected a rural substations site without conducting any environment impact studies or a cost analysis based on those findings.

*An environmental review should be part of the decision-making process, not something that is done after-the-fact to justify the decision that was made.*⁷

Respectfully,



Karl Schwartz
Vice Chair, Springfield Bucks Undesirable Land Use (Sbulu.org)

Attached: E-file confirmation

⁶ See SEPTA Exceptions filed in response to Recommended Decision by ALJ Angela T. Jones, 2009

⁷ Direct Testimony and Exhibits of Mark Gallagher, Vice President of Princeton Hydro, August 18, 2008