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File #: 2507/140068

January 11, 2010

BY HAND

James J. McNulty
Secretary
PA 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, et al. - Docket Nos. A-2009-2082652, etc.

Dear Secretary McNulty:

By this letter, PPL Electric Utilities Corporation ("PPL Electric") responds to correspondence dated December 14, 2009 to you from Andrew Tittler, Esquire, of the United States Department of the Interior. Mr. Tittler's correspondence relates to the above-referenced proceeding and was submitted on behalf of the National Park Service. Mr. Tittler's correspondence was circulated by the Pennsylvania Public Utility Commission (the "Commission") to the parties in the above-referenced proceeding on December 17, 2009.

PPL Electric notes initially that the National Park Service provides no explanation as to why it submitted this letter to the Commission at this time. Although the National Park Service did provide information to the Commission regarding this proceeding at a site view on May 5, 2009, as acknowledged by Mr. Tittler, it never sought party status and has not otherwise participated in this proceeding. Indeed, the National Park Service presently is conducting its own review regarding the issuance of any necessary permits for construction of the Susquehanna-Roseland Transmission Line through the Delaware Water Gap National Recreation Area ("DEWA") and

the Appalachian National Scenic Trail (“ANST”). Because the National Park Service is not a party to the proceeding and because the record in this proceeding is now closed, its comments are procedurally improper and should be disregarded by the Commission. Further, the National Park Service’s comments should be disregarded for the additional reason that they are substantively irrelevant to the fundamental issues in this proceeding, which are whether there is a need for the Susquehanna-Roseland Transmission Line and whether, pursuant to the Commission’s regulations at 52 Pa. Code §§ 57.71 through 57.77, PPL Electric has chosen a reasonable route for the Line.

However, the Commission has circulated this letter to the parties in this proceeding and, to the extent that the Commission may consider this letter in reaching a decision in this proceeding, PPL Electric submits this response. In its correspondence, the National Park Service provided an estimate of time that would be required for it to complete the permitting process relative to the construction of the Susquehanna-Roseland 500 kV Transmission Line through the DEWA and the ANST. In short, the National Park Service estimates that a decision on the permits will be issued “by early-mid 2012.”

PPL Electric believes that the National Park Service’s estimate of the time of the completion of its permitting process is overly conservative. PPL Electric is exploring options for accelerating the National Park Service permitting process, both locally with DEWA and ANST employees, and at federal offices in Washington D.C. It has been PPL Electric’s intent to pursue the possibility of treating the Wallenpaupack-Bushkill segment of the Susquehanna-Roseland Transmission Line as a separate project, given that it has the separate, additional purpose of replacing an existing older and deteriorated 230 kV transmission line that must be replaced regardless of whether the Susquehanna-Roseland Transmission Line is constructed.

Further, PPL Electric notes, as it did in its Exceptions at pp. 24-25, that it could commence construction of the segment of the line between Wallenpaupack and the southern boundary of the Delaware State Forest. This segment of the Susquehanna-Roseland Transmission Line is about 23 miles in length and stops north of Saw Creek Estates. It does not cross any portion of the DEWA. PPL Electric Ex. 1.C., Sheet 21, and is not close to the DEWA’s primary assets.

A review of the separate transmission line replacement project may not be as time-consuming as the National Park Service’s review of the crossing of the DEWA for the Susquehanna-Roseland Transmission Line. In any event, the purpose of this explanation is to express to the Commission the fact that the timing of the review process by the National Park Service is uncertain, and its estimate of the time for the process should not be regarded conclusive or final.

As shown below and on the attached certificate of service, PPL Electric has served a copy of this letter on all parties to the Susquehanna-Roseland proceeding and provided copies to the National Park Service and Public Service Gas & Electric Company.

January 11, 2010

Page 3

Respectfully Submitted,

A handwritten signature in cursive script that reads "David B. MacGregor".

David B. MacGregor

DBM/jl

Enclosure

cc: Andrew Tittler, Esquire
Don McCloskey, PSE&G
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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Date: January 11, 2010


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