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File #: 2507/140066

February 12, 2010

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

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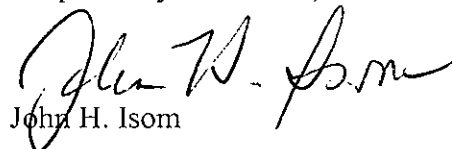
**RE: Letter Of Notification Of PPL Electric Utilities Corporation, Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G, With Respect To The Copperstone-Harrisburg #1 & #2 138/69 kV Tap Transmission Line In South Hanover and Lower Paxton Townships, Dauphin County, Pennsylvania - Docket No. A-2010-**

Dear Secretary McNulty:

Enclosed, for filing, are an original and six (6) copies of the Letter of Notification of PPL Electric Utilities Corporation, together with seven (7) copies of the accompanying exhibits and appendices which are contained in a separately-bound volume.

As indicated on the enclosed certificate of service, copies of the Letter of Notification and accompanying exhibits and appendices are being served by certified mail, return receipt requested upon all affected land owners and involved governmental agencies and municipalities. If there are any questions concerning this matter, please contact me at the addresses or telephone numbers provided above.

Respectfully Submitted,

  
John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

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

A PENNSYLVANIA PROFESSIONAL CORPORATION

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: Letter Of Notification Of PPL Electric :  
Utilities Corporation, Filed Pursuant To 52 :  
Pa. Code Chapter 57 Subchapter G, With : Docket No. A-2010-  
Respect To The Copperstone–Harrisburg :  
#1 & #2 138/69 kV Transmission Line In :  
South Hanover and Lower Paxton :  
Townships, Dauphin County, Pennsylvania :

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**LETTER OF NOTIFICATION**

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TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric”), hereby files, pursuant to 52 Pa. Code §57.72(d), this Letter of Notification to request that the Pennsylvania Public Utility Commission (“Commission”) approve the siting and construction of the Copperstone–Harrisburg #1 & #2 138/69 kV Transmission Line, which will be approximately 1.33 miles in length and will tie into the existing Hummelstown-Harrisburg #3 & #4 Transmission Line in South Hanover and Lower Paxton Townships, Dauphin County, Pennsylvania and connect with the proposed Copperstone 230-69 kV Substation. In support thereof, PPL Electric states as follows:

**I. INTRODUCTION AND OVERVIEW**

1. This Letter of Notification is filed by PPL Electric, a public utility that provides electric distribution and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission.

2. PPL Electric's address is Two North Ninth Street, Allentown, Pennsylvania 18101.

3. PPL Electric's attorneys are:

David B. MacGregor (Pa. Bar I.D. #28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
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John H. Isom (Pa. Bar I.D. #16569)  
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PPL Electric's attorneys are authorized to receive all notices and communications regarding this Letter of Notification.

4. PPL Electric furnishes electric service to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania. PPL Electric is a "public utility" and an "electric distribution company" as

defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803.

5. PPL Electric owns approximately 5,000 miles of transmission lines operating at 69,000 volts or higher, approximately 330 substations with a capacity of 10,000 KVA or more, and approximately 43,000 miles of distribution lines operating at less than 69,000 volts.

6. This Letter of Notification includes the following accompanying exhibits and appendices:

- Exhibit A – Necessity Statement.
- Exhibit B – Engineering Description.
- Exhibit C – Environmental Assessment.
- Appendix A – PPL Electric Design Criteria and Safety Practices.
- Appendix B – PPL Electric Field Management Program.
- Appendix C – List of Property Owners Within the Proposed Right-of-Way.
- Appendix D – List of Involved Governmental Agencies, Municipalities, and Other Public Entities.

7. PPL Electric proposes to construct the Copperstone-Harrisburg #1 & #2 138/69 kV Transmission Line (“Copperstone-Harrisburg Line”), which will be approximately 1.33 miles in length. It will tie into the existing PPL Electric Hummelstown-Harrisburg #3 & #4 69 kV Transmission Line in Lower Paxton Township, Dauphin County and connect with the proposed Copperstone 230-69 kV Substation (“Copperstone Substation”) in South Hanover Township, Dauphin County. The proposed Copperstone-Harrisburg Line is the first part of a three part Project required to improve the reliability of service and meet increasing demand in Central Dauphin County.

8. Due to the small size of the transmission line and the presence of other transmission facilities in the area, it is anticipated that the Copperstone-Harrisburg Line will have minimal incremental impacts on the area.

9. The estimated cost of the Copperstone-Harrisburg Line is approximately \$2,356,000. Construction is scheduled to commence in March 2011, to support an in-service date of May 2012.

## **II. PROJECT SUMMARY**

10. PPL Electric proposes to construct the Copperstone Substation to reinforce the 230 kV and 69 kV systems in central Dauphin County. The Project involves the construction of three separate transmission lines. Each transmission line will connect to the proposed Copperstone Substation. Each of the three transmission lines will be the subject of separate filings with the Commission. In addition, PPL Electric will file with the Commission a petition, pursuant to Section 619 of the Pennsylvania Municipalities Planning Code, Act of July 31, 1968, P.L. 805, *as amended*, 53 P.S. § 10619, for a finding that will exempt the Copperstone Substation from local zoning ordinances. The other letters of notification and zoning petition will be separately filed in the near future.

11. Here, PPL Electric requests Commission approval of Part 1 of the Project, the construction of the Copperstone-Harrisburg Line, which will be approximately 1.33 miles in length. It will tie into the existing PPL Electric Hummelstown-Harrisburg #3 & #4 69 kV Transmission Line, west of the existing Paxton 69-12 kV Substation, and will connect with the proposed Copperstone Substation. A portion of the existing Hummelstown-Harrisburg #3 & #4 69 kV Transmission Line will be renamed the Copperstone-Harrisburg #1 & #2 138/69 kV

Transmission Line. The Copperstone-Harrisburg Line will be designed and constructed for 138 kV operation, although it initially will operate at 69 kV.

12. In Part 2 of the Project, the proposed Copperstone Substation will be connected with a different portion of the existing Hummelstown-Harrisburg #3 & #4 69 kV Transmission Line by constructing approximately 0.53 miles of new double circuit 138/69 kV line, initially operated at 69 kV. This will create the new Dauphin-Copperstone #1 & #2 138/69 kV Transmission Line, which will be the subject of a subsequent filing with the Commission.

13. In Part 3 of the Project, PPL Electric will construct two new 230 kV taps to connect with the proposed Copperstone Substation. One tap will be the proposed Middletown Junction-Copperstone 230 kV Tap, and the other tap will be the proposed Copperstone-North Lebanon 230 kV Tap. These taps will connect the proposed Copperstone Substation with the existing Metropolitan Edison Middletown Junction-North Lebanon 230 kV Transmission Line by splitting this line in the area of the proposed Copperstone Substation. Part 3 of the Project will be the subject of a subsequent filing with the Commission.

14. The Copperstone Substation and the three separate transmission lines are needed to relieve projected overloads on PPL Electric's 230 kV and 69 kV transmission systems in central Dauphin County.

15. Studies conducted for PPL Electric's system, in conjunction with the PJM Regional Transmission Expansion Process ("RTEP"), revealed that several violations of the North American Reliability ("NERC") standards are likely to occur on PPL Electric's 230 kV

⋮

electric system in central Dauphin County under N-1-1 conditions in the summer of 2012.<sup>1</sup> The studies indicated the following N-1-1 conditions would cause overloads:

- By the summer of 2012, under forecasted summer peak load conditions, a forced outage of the Dauphin–Juniata 230 kV Transmission Line and a subsequent outage of the Hummelstown–Middletown Junction #1 230 kV Transmission Line would overload the Hummelstown-Middletown Junction #2-Steel Tap 230 kV Transmission Line.
- By the summer of 2012, under forecasted summer peak load conditions, a forced outage of the Dauphin–Juniata 230 kV Transmission Line and subsequent outage of the Hummelstown–Middletown Junction #2-Steel Tap 230 kV Transmission Line would overload the Hummelstown-Middletown Junction #1 230 kV Transmission Line.

16. Studies conducted for PPL Electric’s transmission system, in conjunction with the PJM RTEP, also revealed that violations of PPL Electric’s Reliability Principles and Practices (RP&P) are likely to occur on PPL Electric’s 69 kV system in central Dauphin County in the summer of 2012. The studies indicated that the following overloads would occur for single contingency operations:

- The Dauphin 230-69 kV Substation is designed with two 230-69 kV transformers. By the summer of 2012, under forecasted summer peak load conditions, a forced outage of either transformer at the Dauphin 230-69 kV Substation would overload the remaining transformer.
- The Hummelstown 230-69kV Substation is designed with three 230-69 kV transformers. By the summer of 2012, under forecasted summer peak load conditions, a forced outage of either transformer at the Hummelstown 230-69 kV Substation would overload the remaining 230-69 kV transformers.
- By the summer of 2012, under forecasted summer peak load conditions, a forced outage of the Hummelstown–Harrisburg #1 and #2 69 kV Transmission Line circuits would cause overloads on the Hummelstown–Harrisburg #3 and #4 69 kV Transmission Line circuits.
- By the summer of 2012, under forecasted summer peak load conditions, a forced outage of the Hummelstown–Harrisburg #4 69 kV Transmission Line circuit or

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<sup>1</sup> An N-1-1 condition is defined as one 230 kV line outage, followed by a subsequent second 230 kV line outage.

the Harrisburg Substation 69 kV bus section #3, would cause overloads on the Hummelstown–Harrisburg #3 69 kV Transmission Line circuit.

17. To resolve these projected violations, PPL Electric plans to construct the proposed Copperstone Substation, together with the three separate transmission lines described above. This reinforcement will resolve all the above-mentioned overloads, and will provide additional capacity for future electric system load growth.

18. The proposed Copperstone-Harrisburg Line, which is Part 1 of the Project and the subject of this Letter of Notification, will be located entirely in South Hanover and Lower Paxton Townships, Dauphin County, Pennsylvania. An aerial plot plan is provided at the end of Exhibit B to this Letter of Notification. The plot plan depicts the location of the existing and proposed facilities.

19. The Copperstone-Harrisburg Line will be constructed using steel mono-poles that will be either direct embedded or installed on concrete foundations with an approximate above-ground height of 85 to 100 feet. Angles structures and tap structures may be guyed. The proposed line will consist of two circuits, both of which will have three conductors and one overhead ground wire. The power conductors will be 795.0 KCMIL,<sup>2</sup> 30/19 strand ACSR.<sup>3</sup> The overhead ground wire will be 3/8-inch steel and will provide lightning protection for the proposed transmission line.

20. The Copperstone-Harrisburg Line will be designed to comply with, and will generally surpass, the applicable minimum standards in the National Electrical Safety Code (NESC).

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<sup>2</sup> Thousand circular Mils.

<sup>3</sup> Aluminum conductor steel reinforced.

21. The total estimated cost to design and construct the proposed three-part transmission line Project and Copperstone Substation is approximately \$28 million, which includes the estimated \$2.35 million cost for the proposed Copperstone-Harrisburg Line.

22. Construction is scheduled to commence in March 2011, for an in service date of May 2012.

23. Because the proposed Copperstone-Harrisburg Line will be only 1.33 miles in length and will be installed in the vicinity of existing transmission lines as depicted in an aerial plot plan at the end of Exhibit B to this Letter of Notification, it is anticipated that the Copperstone-Harrisburg Line will have minimal incremental impacts on the area. The proposed Copperstone-Harrisburg Line will be contained entirely in rights-of-way previously owned or recently acquired by PPL Electric, or on PPL Electric fee-owned property. As a result, PPL Electric anticipates that the proposed line will have little incremental environmental impacts.

24. Accompanying this Letter of Notification is a separately bound volume containing Exhibits A through C and Appendices A through D, which provide additional information about the Copperstone-Harrisburg Line. This Letter of Notification and accompanying Exhibits and Appendices, which are incorporated herein by reference, contain all the information required by 52 Pa. Code § 57.72(d)(4).

### **III. LETTER OF NOTIFICATION**

25. PPL Electric is proceeding by means of a Letter of Notification, instead of a full Application, pursuant to the Commission's regulations at 52 Pa. Code § 57.72(d). The Copperstone-Harrisburg Line qualifies for use of a Letter of Notification because it will be less than two miles in length.

26. The Necessity Statement for the Copperstone-Harrisburg Line is provided as Exhibit "A" in the Exhibits and Appendices accompanying this Letter of Notification. As explained in greater detail therein, the purpose of the Copperstone-Harrisburg Line is to resolve projected overloads and increase capacity on PPL Electric's 230 kV and 69 kV transmission facilities in central Dauphin County.

27. In determining the need for the Copperstone-Harrisburg Line, PPL Electric considered two functional alternatives. The first functional alternative would have involved an upgrade of transformers at the Dauphin 230-69 kV Substation and the West Shore 230-69 kV Substation. This functional alternative would have also required the reconstruction of the West Shore-Harrisburg #1 and #2 69 kV Transmission Line, and the construction of the following two new transmission lines: a new double circuit 69 kV line to connect the Hummelstown 230-69 kV Substation with the Duke 69-12 kV Substation; and a new single circuit 230 kV line to connect the Hummelstown 230-69 kV Substation to the Middletown Junction 230 kV Substation. Although feasible, this functional alternative would have required extensive new rights-of-way for the new 230 kV and 69 kV transmission lines and would have cost an estimated \$11 million more than the preferred alternative.

28. The second functional alternative considered by PPL Electric would have involved the construction of a new 230-69 kV substation and the construction of four new 138/69 kV transmission lines to tie into the existing West Shore-Harrisburg #1 and #2 69 kV Transmission Line. This second alternative would solve the overload concerns explained above, but it would also require extensive new rights-of-way for the new 138/69 kV transmission lines and would have cost an estimated \$26 million more than the preferred alternative.

29. Additionally, both of these alternatives would require extensive outages at several substations and 69 kV facilities, thereby reducing the ability to provide reliable electrical service to PPL Electric's customers in central Dauphin County area. Consequently, these functional alternatives were rejected in favor of the preferred alternative.

30. The proposed Copperstone-Harrisburg Line will not create any unreasonable risk of danger to the public health or safety. The Copperstone-Harrisburg Line will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable NESC minimum standards and all applicable legal requirements. Descriptions of the NESC standards, PPL Electric's design criteria, and PPL Electric's safety practices are provided in Appendix A hereto.

31. The Engineering Description of the Copperstone-Harrisburg Line is provided in Exhibit "B" to this Letter of Notification.

32. Most of the work for the new Copperstone-Harrisburg Line will be completed on PPL Electric fee-owned property and under existing PPL Electric right-of-way agreements with defined right-of-way widths. PPL Electric has successfully negotiated right-of-way agreements with the owners of the remaining property necessary to construct and maintain the Copperstone-Harrisburg Line. Consequently, no additional land or rights-of-way need to be acquired for the Copperstone-Harrisburg Line.

33. Visual impacts of Copperstone-Harrisburg Line are expected to be minimal based on the fact that the Copperstone-Harrisburg Line will be only 1.33 miles in length and will be in the vicinity of existing transmission facilities.

34. No communication towers, pipelines, or other utilities will be affected by the proposed Copperstone-Harrisburg Line. The nearest airport is approximately 7 miles from the proposed Copperstone-Harrisburg Line.

35. The proposed Copperstone-Harrisburg Line was reviewed with the Pennsylvania Historical and Museum Commission (PHMC). The following lists were reviewed for the presence of historical districts and structures in the area:

- National Historic Landmarks in Pennsylvania
- National Register Historic Districts in Pennsylvania
- National Register Individual Properties and Historic Districts in Pennsylvania
- National Register/Listed and Eligible Properties in Pennsylvania

The PHMC has determined that, due to the absence of historical sites in the area and the small Project size, no further archaeological investigations are required.

36. The proposed Copperstone-Harrisburg Line will not affect any unique geological, scenic, or natural areas. No national natural landmarks, parks, recreational facilities, or natural areas are located near the Project area. The Reservoir Park Overlook is located approximately 5.5 miles west of the Project area and the Landis Millers House is located approximately 2.2 miles south of the Project area. These features will not be affected by the proposed Copperstone-Harrisburg Line due to their distance from the Project area and development between the Project area and these features.

37. The Copperstone-Harrisburg Line will cross the Beaver Creek and various wetlands. All wetlands and waters have been delineated and added to the construction drawings. All wetlands and waters will be easily spanned and, therefore, PPL Electric does not anticipate any impacts from the Copperstone-Harrisburg Line. All required permits will be obtained from the Pennsylvania Department of Environmental Protection and the United States Army Corps of

Engineers prior to construction through any wetlands or other aquatic resources. PPL Electric will acquire all required sedimentation control permits and comply with all permit conditions.

38. Some tree clearing will be required for the proposed Copperstone-Harrisburg Line. PPL Electric will apply its "Specification for Initial Clearing and Control of Vegetation on or Adjacent to Electric Line Right-of-Way Through Use of Herbicides, Mechanical and Hand Clearing Techniques" to mitigate any impacts.

39. PPL Electric has consulted with state and federal agencies to obtain information regarding endangered and threatened species in close proximity to the Copperstone-Harrisburg Line. A review of the Pennsylvania Natural Diversity Inventory records indicates there are potential impacts under the Pennsylvania Department of Conservation and Natural Resources ("DCNR") regulations. As a result, DCNR has recommended that PPL Electric retain a qualified expert to conduct a survey of the area at the appropriate time of year. PPL Electric complied with DCNR's request and sent documentation of the findings to DCNR. PPL Electric has obtained correspondence from DCNR, dated January 7, 2008, stating that no impacts are anticipated and no further coordination is needed for this Project. However, because the report has since expired, it will be resubmitted to DNCR for review. Based on a recent PNDI review, PPL Electric anticipates no impacts.

40. The Copperstone-Harrisburg Line was reviewed with representatives of South Hanover and Lower Paxton Townships and Dauphin County. The Townships and the County have no objection to the Copperstone-Harrisburg Line or Copperstone Substation.

41. Appendix D accompanying this Letter of Notification contains a list of the involved governmental agencies, municipalities and other public entities. Copies of this Letter

of Notification are being served on the agencies listed in Appendix D in accordance with 52 Pa. Code § 57.72(d)(3).

42. Appendix B in the Exhibits and Appendices accompanying this Letter of Notification explains PPL Electric's standards for Magnetic Field Management.

43. As soon as practicable after the filing of this Letter of Notification and the assignment by the Commission of a docket number, PPL Electric will publish notice of the filing in newspapers of general circulation in the area of the proposed Copperstone-Harrisburg Line. Such notice will contain: (a) the date this Letter of Notification was filed with the Commission; (b) a brief description of the Copperstone-Harrisburg Line and its location; (c) locations where the complete Letter of Notification may be reviewed by the public; and (d) an instruction that the interested persons should contact, within 15 days, James J. McNulty, Secretary, at the Commission's Harrisburg address.

44. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the proposed Copperstone-Harrisburg Line will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71, *et seq.*

#### **IV. RELATED PROCEEDINGS**

45. Contemporaneously with the filing of this Letter of Notification, PPL Electric is filing with the Commission a Petition for a finding that a building to shelter control equipment at the proposed Copperstone 230-69 kV Substation in South Hanover Township, Dauphin County, is reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local Zoning Ordinance ("Zoning Petition"). The Copperstone-Harrisburg Line will be

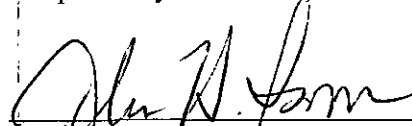
connected to the proposed Copperstone Substation, including the control equipment building that is the subject of the Zoning Petition. Issues related to the Zoning Petition are interrelated with this Letter of Notification.

46. Because this Project involves the construction of three separate transmission lines connecting to the Copperstone Substation, PPL Electric will seek Commission approval under three separate filings. Subsequent to the filing of this Letter of Notification, PPL Electric will file with the Commission two additional Letters of Notification seeking Commission approval to site and construct the transmission lines associated with Parts 2 and 3 of the Project.

V. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve the siting and construction of the Copperstone-Harrisburg #1 & #2 138/69 kV Transmission Line in South Hanover and Lower Paxton Townships, Dauphin County, Pennsylvania, that is explained above and in the Exhibits and Appendices hereto.

Respectfully submitted,



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Of Counsel:  
Post & Schell, P.C.

Date: February 12, 2010

*Attorneys for PPL Electric Utilities Corporation*

**VERIFICATION**

I, David G. DeCampli, being the President of PPL Electric Utilities Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect that PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

Date: Feb. 11, 2010

  
\_\_\_\_\_  
David G. DeCampli

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P.A. PUC  
SECRETARY'S BUREAU

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Letter of Notification has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED**

Pennsylvania Historical and Museum  
Commission  
Bureau for Historic Preservation  
Commonwealth Keystone Building, Second  
Floor  
400 North Street  
Harrisburg, PA 17120-0053  
Attn: Mr. Douglas C. McLearen, Chief

Pennsylvania Department of Transportation  
Commonwealth Keystone Building  
400 North Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17120  
Attn: The Honorable Allen D. Biehler, P.E.,  
Secretary

Department of Environmental Protection  
P.O. Box 2063  
Market Street State Office Building  
Harrisburg, PA 17105-2063  
Attn: Office of Field Operations

South Hanover Township Board of  
Supervisors  
111 West Third Street  
Hershey, PA 17033-2498

South Hanover Township Planning  
Commission  
111 West Third Street  
Hershey, PA 17033-2498  
Attn: Penny Pollick, Township Manager

Lower Paxton Township Board of  
Supervisors  
425 Prince Street  
Harrisburg, PA 17109

Lower Paxton Township Planning  
Commission  
425 Prince Street  
Harrisburg, PA 17109

Dauphin County Planning Commission  
112 Market Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17101-2015

Dauphin County Commissioners  
PO Box 1295  
Harrisburg, PA 17108

Loyal E & Patricia A Morris  
1616 Copperstone Road  
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6500 Leonard Dr.  
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David K. & Marilyn S. Wagner  
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Gregory A. & Barbara A. Harris  
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Michael J. & Carol A. Carricato  
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John L. & Suzanne E. Seitz  
6520 Leo Dr.  
Harrisburg, PA 17111-4852

Date: February 12, 2010

Gerald W. Kapp, Jr. & Elsie J.  
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Harrisburg, PA 17111-4853

Glenn L. & Barbara R. Cassel  
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Harrisburg, PA 17111-4807

  
Christopher Wright