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File #: 2507/140066

March 10, 2010

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 Effort Mountain #1 & #2 138 kV Taps In Chestnuthill And Polk Townships, Monroe County, Pennsylvania - Docket No. A-2010-2152104

Petition Of PPL Electric Utilities Corporation For A Finding That A Building To Shelter Control Equipment At The Effort Mountain Substation To Be Constructed In Chestnuthill Township, Monroe County, Pennsylvania Is Reasonably Necessary For The Convenience Or Welfare Of The Public - Docket No. A-2010-2153061

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 Larue High For The Proposed Effort Mountain #1 & #2 138 kV Taps In Chestnuthill And Polk Townships, Monroe County, Pennsylvania Is Necessary Or Proper For The Service, Accommodation, Convenience Or Safety Of The Public - Docket No. A-2010-2163154

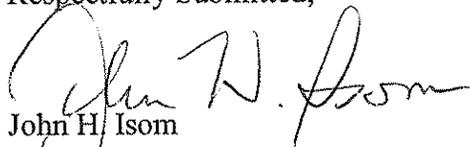
Albert Barney v. PPL Electric Utilities Corporation - Docket No. C-2009-2107073

Dear Secretary McNulty:

March 10, 2010
Page 2

Enclosed for filing is the original Motion to Consolidate of PPL Electric Utilities Corporation in the above-referenced proceedings. As indicated on the certificate of service, copies have been provided to the parties in the manner indicated.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "John H. Isom". The signature is written in black ink and is positioned above the printed name.

John H. Isom

JHI/jl

Enclosures

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 FIRST CLASS MAIL

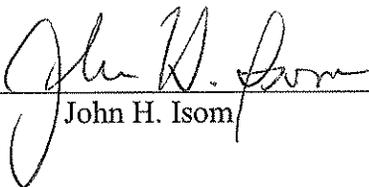
Honorable Wayne L. Weismandel
Administrative Law Judge
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

Larue High
RD 1 Box 259
Effort, PA 18330

Albert Barney
40 Rodeo Drive
Kunkletown, PA 18058

Suzanne A. Hart
RR 1 Box 279
Effort, PA 18330

Date: March 10, 2010



John H. Isom

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application Of PPL Electric Utilities :
Corporation Filed Pursuant To 52 Pa Code :
Chapter 57, Subchapter G, For Approval Of : Docket No. A-2010-2152104
The Siting And Construction Of The Effort :
Mountain #1 & #2 138 kV Taps In :
Chestnuthill And Polk Townships, Monroe :
County, Pennsylvania :

Petition Of PPL Electric Utilities Corporation :
For A Finding That A Building To Shelter :
Control Equipment At The Effort Mountain : Docket No. A-2010-2153061
Substation To Be Constructed In Chestnuthill :
Township, Monroe 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 : Docket No. A-2010-2163154
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 :
Larue High For The Proposed Effort Mountain :
#1 & #2 138 kV Taps In Chestnuthill And Polk :
Townships, Monroe County, Pennsylvania Is :
Necessary Or Proper For The Service, :
Accommodation, Convenience Or Safety Of :
The Public :

Albert Barney :
 :
v. : Docket No. C-2009-2107073
 :
PPL Electric Utilities Corporation :

**MOTION TO CONSOLIDATE OF
PPL ELECTRIC UTILITIES CORPORATION**

TO ADMINISTRATIVE LAW JUDGE WAYNE L. WEISMANDEL:

PPL Electric Utilities Corporation (“PPL Electric”), by and through its legal counsel, Post & Schell PC, hereby moves, pursuant to 52 Pa. Code § 5.81, for the consolidation of the above-captioned matters. PPL Electric respectfully requests that the Pennsylvania Public Utility Commission (“Commission”) consolidate these proceedings for purposes of hearings and adjudication because they raise common issues of fact and law and, therefore, promote the prompt, efficient, and consistent administration of justice. In support of this Motion, PPL Electric states as follows:

1. 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. PPL Electric is also a “public utility corporation” as defined in Section 1103 of the Business Corporation Law of 1988, 15 Pa.C.S. § 1103.

2. 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 kilovolt-amperes or more, and approximately 43,000 miles of distribution lines operating at less than 69,000 volts.

3. Through its system planning process, PPL Electric has identified that, due to load growth, the distribution facilities serving the Sun Valley/Jonas area are operating near or at their

capacity during peak periods, and are projected to exceed normal planning guidelines in violation of PPL Electric's Reliability Principles and Practices manual. In addition to being heavily loaded, the distribution lines in this area are among the poorest performing distribution lines in PPL Electric's system.

4. After identifying these reliability issues, PPL Electric developed a plan to reinforce the distribution system in the area. PPL Electric examined various electrical solutions, or functional configurations, to enable it to continue to provide adequate and reliable service to the public and plan appropriate measures to assure reasonably continuous supply to the Sun Valley/Jonas area. After extensive analysis, PPL Electric concluded that the preferred functional configuration was to construct a new 138-12 kV substation, together with new 12 kV distribution lines in Chestnut and Polk Townships, Monroe County.

5. The principal part of the plan requires construction of approximately 5.7 miles of new 138 kV transmission lines, the proposed Effort Mountain #1 & #2 138 kV Taps ("Effort Mountain Taps"). The Effort Mountain Taps will connect the Siegfried-Jackson 138 kV Transmission Lines to the proposed Effort Mountain Substation. The new Effort Mountain Substation, in turn, will supply new 12 kV distribution lines. Initially, there will be two new distribution lines. More lines may be added in the future as appropriate to meet load growth.

6. On January 8, 2010, PPL Electric filed the "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 Effort Mountain #1 & #2 138 kV Taps In Chestnuthill And Polk Townships, Monroe County, Pennsylvania" ("Siting Application"), which was docketed at Docket No. A-2010-2152104.

7. On January 15, 2010, PPL Electric filed the “Petition of PPL Electric Utilities Corporation For A Finding That a Building To Shelter Control Equipment At The Effort Mountain Substation To Be Constructed in Chestnuthill Township, Monroe County, Pennsylvania is Reasonably Necessary For The Convenience Or Welfare Of The Public” (“Zoning Petition”), which was docketed at Docket No. A-2010-2153061.

8. On March 4, 2010, PPL Electric filed the “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 Larue High For The Proposed Effort Mountain #1 & #2 138 kV Taps In Chestnuthill And Polk Townships, Monroe County, Pennsylvania Is Necessary Or Proper For The Service, Accommodation, Convenience Or Safety Of The Public” (“Eminent Domain Application”), which was docketed at Docket No. A-2010-2163154

9. On May 13, 2009, Albert Barney filed a Formal Complaint, “Albert Barney v. PPL Public Utilities Corporation” (“Barney Complaint”), which was docketed at Docket No. C-2009-2107073. The Barney Complaint pertains to the proposed Effort Mountain Taps. On June 3, 2009, PPL Electric filed an Answer and New Matter Responding to the Formal Complaint. On February 23, 2010, PPL Electric served Mr. Barney with complete copies of the Siting Application and Zoning Petition, together with the accompanying Exhibits and Appendices. Issues related to the Formal Complaint are interrelated with the Siting Application, Zoning Petition, and Eminent Domain Application.

10. The above-mentioned proceedings are interrelated and raise common issues of law and fact. Because the disposition of each of these matters is interrelated, the consolidation of

these proceedings will promote the efficient use of the time and resources of the parties and the Commission.

WHEREFORE, PPL Electric respectfully requests that the Honorable Judge Wayne L. Weismandel enter an order consolidating (1) the Siting Application at Docket No. A-2010-2152104, (2) the Zoning Petition at Docket No. A-2010-2153061, (3) the Eminent Domain Application at Docket No. A-2010-2163154, and (4) the Barney Complaint at Docket No. C-2009-2107073 for purposes of hearings and adjudication.

Respectfully submitted,



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Of Counsel:

Post & Schell, P.C.

Dated: March 10, 2010

Attorneys for PPL Electric Utilities Corporation