

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**  
**Harrisburg, Pennsylvania 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.**

**Public Meeting – April 22, 2010  
2082652-OSA  
Docket No. A-2009-2082652, et al.**

**DISSENTING STATEMENT OF VICE CHAIRMAN TYRONE J. CHRISTY**

Today, the Commission denied the Petition for Reconsideration or Clarification (Petition) of the Office of Consumer Advocate (OCA) of the Commission's Opinion and Order adopted January 14, 2010, in the above captioned proceeding. In its Petition, the OCA requested that the Commission not allow PPL Electric Utilities Corporation (PPL) to commence construction of the Susquehanna-Roseland 500kV Transmission Line (SR500) anywhere in Pennsylvania until all major authorizations are obtained, including the permit from the National Park Service (NPS) to cross the Delaware Water Gap National Recreation Area (DEWA). The OCA contended that allowing the construction of SR500, "... without the ability to cross the DEWA would result in a very expensive line to nowhere...." Petition at 8.

The majority based its decision to deny the OCA's Petition by accepting PPL's representation that:

Even if the NPS were to require PPL Electric to relocate the crossing to an alternative area within the DEWA, PPL Electric would still be able to use the entire length of the S-R Transmission Line from Susquehanna Switchyard to the Wallenpaupack Hydroelectric Plant. Tr. 816-817. No portion of this segment of the S-R Transmission Line would have to be modified; no investment would be wasted.

PPL Answer at 11.

It is arguable, at best, that no investment will be wasted if the NPS requires PPL Electric to relocate the crossing to an alternative area within the DEWA. Regardless of

PPL's assertions, the fact that the cost and location of the relocated line is unknown is highly problematic for me.

I also agree with the OCA's persuasive argument that, "...the condition that PPL refrain from any actual construction of the line prior to obtaining all necessary permits is prudent, reasonable, and in the public interest." Reply Brief, at 45.

It is important to note that all of the economic risk for this project is placed upon the rate payers and, as such, any decisions pertaining to this project should not be taken lightly. In its Reply Exceptions the ECC states:

If the Delaware Water Gap National Recreation area permits are *not* obtained, (1) the route of the Susquehanna to Roseland transmission line will need to change, or (2) PPL will need to propose a completely different project. And, if the Commission allows construction to start immediately, and the federal permits are not procured, PPL will have started construction of a \$1.2 billion line that cannot be completed.

And, as Judge Cowell recognized in her Recommended Decision, the costs of starting construction on these proposed facilities are shouldered by the ratepayers, not by PPL, R.D. at 278. Subjecting ratepayers to the economic risk of a huge \$1.2 billion transmission line – which cannot be completed without federal permits – is unacceptable. R.D. at 278.

Reply Exceptions at 2.

Consistent with my previous dissent, and for the reasons stated above, I am dissenting from the majority's decision to deny the OCA's Petition. I qualify my dissent by stating that I remain fully committed to supporting new transmission lines and upgrades that are necessary upon the availability and review of a full and complete record that includes the consideration of siting alternatives and incorporates current information on load forecasts, including appropriate recognition of Demand Side Resources.

4-22-10

DATE

Tyrone J. Christy  
TYRONE J. CHRISTY, VICE CHAIRMAN