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File #: 2507/140066

October 25, 2010

BY HAND

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Petition Of PPL Electric Utilities Corporation For Waiver Of Certain Provisions Of The Pennsylvania Public Utility Commission's Regulations At 52 Pa. Code § 57.71 et seq., Governing Commission Review Of Siting And Construction Of Electric Transmission Lines With Regard To The #1 And #2 Elroy-Hatfield 138/69 kV Taps in Hatfield And Franconia Townships, Montgomery County - Docket No. P-2010-

Dear Secretary Chiavetta:

Enclosed, are the original and three (3) copies of the Petition of PPL Electric Utilities Corporation in the above-referenced proceeding.

Copies have been provide to the persons as indicated on the enclosed certificate of service.

Respectfully Submitted,

John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service
Robert F. Young
Paul T. Diskin

RECEIVED
2010 OCT 25 PM 3:43
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

RECEIVED
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Petition Of PPL Electric Utilities :
Corporation For A Waiver Of Certain Of The :
Pennsylvania Public Utility Commission's :
Regulations At 52 Pa. Code §§ 57.71 *Et Seq.* : Docket No. P-2010-_____
Governing Commission Review Of Siting :
And Construction Of Electric Transmission :
Lines With Regard To The #1 and #2 Elroy-
Hatfield 138/69 KV Taps In Hatfield And
Franconia Townships, Montgomery County

PETITION OF PPL ELECTRIC UTILITIES CORPORATION

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric”) hereby petitions the Pennsylvania Public Utility Commission (“Commission”), pursuant to 52 Pa Code §§ 5.43 and 57.72(e), for a waiver of certain of the Commission’s regulations governing Commission review of siting and construction of electric transmission lines set forth at 52 Pa. Code §§ 57.71 *et seq.* (“Petition”). PPL Electric seeks this waiver of 52 Pa Code § 57.72(d) in order to file a Letter of Notification in lieu of a full siting application to seek approval of the siting and construction of the Elroy-Hatfield #1 and #2 138/69 kV Taps in portions of Hatfield and Franconia Townships, Montgomery County, Pennsylvania (“Elroy-Hatfield Taps”). The Elroy-Hatfield Taps will be 2.03 miles in length and is needed to improve the reliability of electric service in portions of Montgomery and Bucks Counties. The Elroy-Hatfield Taps will be located entirely in an existing utility corridor that is already occupied by another transmission line. In support of this Petition, PPL Electric states as follows:

A. INTRODUCTION AND OVERVIEW

1. PPL Electric provides electric distribution, transmission and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission. 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 serves 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.

2. PPL Electric’s address is:

Two North Ninth Street
Allentown, PA 18101

3. PPL Electric’s attorneys are:

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PPL Electric's attorneys are authorized to receive all notices and communications regarding this Petition.

4. 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.

B. TRANSMISSION LINE CONSTRUCTION

5. The subject of this Petition is the proposed 2.03 miles of new Elroy-Hatfield Taps which will connect the Elroy Substation with the Buxmont-Hatfield #3 and #4 69 kV transmission lines. The proposed route for the Elroy-Hatfield Transmission Line is shown on Attachment 1 to this Petition.

6. The proposed Elroy-Hatfield Transmission Line will be located in an area in which PPL Electric's facilities are interconnected with, and in some locations are supplied by, facilities of PECO Energy Company ("PECO"). The Elroy location contains a 500 kV switchyard, which is owned and operated by PECO, and a PPL Electric substation. The PPL Electric Elroy Substation includes two transformers which step down the voltage of electric energy received from PECO from 500 kV to 69 kV. The electric energy from PPL Electric's Elroy Substation is transmitted to other facilities through PPL Electric's 69 kV transmission system.

7. PPL Electric's preferred route for the 2.03 mile transmission taps is located entirely within an existing utility corridor. This corridor includes property owned in fee by PPL Electric, right-of-way owned by PPL Electric, property owned in fee by PECO and right-of-way owned by PECO. This utility corridor is shown on Attachment 1. More specifically, the

proposed route will include 0.40 miles on property and right-of way owned by PPL Electric and 1.63 miles on property and right-of-way owned by PECO.

8. No additional right-of-way will be required because PPL Electric and PECO have entered into an agreement under which PPL Electric may utilize the portions of the utility corridor owned by PECO that are required for the Elroy-Hatfield Transmission Line.

9. The minimum width of the utility corridor is 300 feet. It has been sized to provide adequate space to accommodate multiple transmission lines. Currently, a PECO single circuit 500 kV transmission line is the only transmission line that occupies the entire length of the utility corridor in which PPL Electric will construct the Elroy-Hatfield Taps. The structures for PECO's transmission line are lattice towers that range from 90 to 110 feet in height. In addition, the southern portion of the utility corridor is occupied by PPL Electric's Elroy #1 and #2 69 kV Taps ("Elroy Taps"), which are supported by structures that are 60 to 95 feet in height, and Hatfield Quality Meats' #1 and #2 69 kV Taps ("Hatfield Taps"), which are supported by structures that range from 75 to 95 feet in height. The structures that support these tap lines are either wood or steel. The Elroy Taps and Hatfield Taps are located in the southern portion of the utility corridor near PPL Electric's 500-69 kV Elroy substation and PECO's Elroy 500kV switchyard. The existing utility corridor and the surrounding area are shown on Attachment 1.

10. The proposed Elroy-Hatfield Taps will be supported by single-shaft steel poles that will be approximately 85 feet in height. The average span length will be approximately 290 feet. A cross section of the utility corridor depicting both the proposed PPL Electric Elroy-Hatfield Taps and the existing 500 kV PECO line is included as Attachment 2.

11. The proposed Elroy-Hatfield Taps will be situated within the utility corridor to allow construction by PECO of an additional single circuit 500 kV line in the future.

12. Alternative routes outside this existing utility corridor would be extremely difficult to site as a result of extensive residential development in this area as shown on Attachment 1.

13. Use of the existing utility corridor will reduce the need to acquire and clear additional right-of-way and thus reduce environmental impacts and reduce costs.

14. The Elroy-Hatfield Taps are needed by PPL Electric to continue to provide adequate and reliable service. The new taps will provide load relief and improved transfer capacity to facilitate restoration of service to the already heavily loaded Buxmont-Elroy #1 and #2 and the Buxmont-Hatfield #3 and #4 69 kV transmission lines. Specifically, loss of the Buxmont-Hatfield #4 69 kV transmission line would load the Buxmont-Hatfield #3 69 kV transmission line to 100 percent of its 124 MVA emergency capacity.

Also, loss of the double circuit Buxmont-Hatfield #3 and #4 69 kV transmission lines would initially interrupt approximately 125 MW of load, or approximately 15,000 customers in Bucks and Montgomery Counties. Absent the proposed reinforcement of the transmission system, it is unlikely that service could be restored to all interrupted customers in less than two hours due to the limited transfer capability of the already heavily loaded Buxmont-Elroy #1 and #2 69 kV transmission lines. Therefore, the existing facilities violate PPL Electric's guidelines for service reliability set forth in its Reliability Principles and Practices, which dictate that loss of a double circuit 69 kV transmission line should not cause an interruption of service to more than 120 MW of load for greater than two hours.

The new Elroy-Hatfield 138/69 kV Taps will revolve these reliability concerns by providing additional conductor capacity which will relieve loading concerns on existing facilities and provide additional transfer capability between other sources to facilitate faster restoration of

service should interruption of other transmission lines occur in the area. As an additional benefit, the construction of the Elroy-Hatfield Taps will assist PPL Electric in the maintenance of its transmission facilities in the area ensuring the high degree of reliability expected by existing customers served from these lines.

C. WAIVER REQUEST

15. The most practical and efficient way for PPL Electric to seek Commission approval of the siting and construction of the Elroy-Hatfield Taps is via a Letter of Notification under 52 Pa. Code § 57.72(d) rather than a full Application under 52 Pa Code §§ 57.71(a)-(c). Completion of a full application would necessitate completion of numerous, substantial studies and reports that need not be completed in order to prepare a Letter of Notification.

16. Section 57.72(d) sets forth the circumstances under which a Letter of Notification may be used instead of an Application as follows:

“(d) Letter of Notification in lieu of application:

(1) A Letter of Notification may be filed with the commission in lieu of the application process set forth in §§ 57.71 – 57.76 for the following:

(i) An HV line which is proposed to be located entirely on an existing transmission line right-of-way, so long as the size, character design, or configuration of the proposed HV line does not substantially alter the right of way.

(ii) An HV line which is proposed to be located entirely within a public road.

(iii) An HV line which is proposed to be located entirely within the applicant’s existing transmission line right-of-way and the property of the sole customer to be served by the line, so long as the size, character, design, or configuration of the proposed line does not substantially alter the right-of-way.

(iv) A line for which the voltage is proposed to be increased above its present levels, so long as the size,

character, design or configuration of the proposed line does not substantially alter the right-of-way.

(v) An HV line which is to be reconducted or reconstructed so long as the size, character, design or configuration of the proposed line does not substantially alter the right-of-way.

(vi) An HV line having a proposed route of 2 miles or less.”

52 Pa Code § 57.72 (d).

17. As proposed, the proposed transmission line does not meet the strict application of any one of the exceptions outlined above. However, the proposed transmission line does come close to fitting within one of the circumstances set forth in the Commission’s regulations because its total length is 2.03 miles — only slightly more than 2 miles. PPL Electric notes further that the entire length of the proposed transmission line is within an existing right-of-way and utility corridor.

18. The Commission’s Regulations contained at 52 Pa. Code § 5.43 allow generally for petitions for waiver of Commission regulations. More importantly, the Commission’s Transmission Line Siting Regulations, at 52 Pa. Code § 57.71 *et seq.* specifically allow for requests for waiver of specific regulations. This specific provision states:

“(e) The Commission or the presiding officer may – upon the petition of any party, upon the Commission’s own motion, or upon the presiding officer’s own motion – waive one or more of all of the requirements in this subchapter. The petition shall clearly state the requirements sought to be waived and the reasons therefor.”

52 Pa. Code § 57.72(e).

19. PPL Electric respectfully requests a waiver of the strict application of 52. Pa Code § 57.72(d)(1)(vi) in order to file a Letter of Notification in lieu of an Application for approval to site and construct the proposed Elroy-Hatfield Taps. The entire length of the proposed

transmission line is 2.03 miles which is only about 160 feet longer than the length of a transmission line that automatically qualifies for use of a Letter of Notification. Further, the proposed Elroy-Hatfield Taps will be located entirely in an established utility corridor which is composed of property owned in fee by PPL Electric, right-of-way owned by PPL Electric, property owned in fee by PECO and right-of-way owned by PECO. As explained previously, PPL Electric has entered into an agreement with PECO under which PPL Electric may construct a transmission line in the property and right-of-way owned by PECO, and the utility corridor in which PPL Electric plans to construct the Elroy-Hatfield Taps is already occupied by three other transmission lines.

20. PPL Electric has met with representatives of the Hatfield Township, Franconia Township and Montgomery County. None of the representatives of the Townships or the County expressed any opposition to the project.

21. The Commission has approved similar requests granting waivers of certain regulations regarding Commission Review of Siting and Construction of Electric Transmission Lines at 52 Pa Code § 57.71 *et seq.*

22. Specifically, *In Letter of Notification of Pennsylvania Electric Company pursuant to 52 Pa. Code § 57.72(d) to Install the East-Towanda Mansfield 115 kV Transmission Line Tap to the Tennessee Gas Pipeline Substation Located in Troy Township, Bradford County, Pennsylvania*, Docket No. A-110400F0045 (Feb. 6, 2006), the Commission granted Penelec's request for waiver of Section 57.72 of the Commission's siting regulations and permitted Penelec to seek Commission approval for the project by means of a Letter of Notification. The proposed project was 2.6 miles long, and was located along the rights-of-way of an existing line and across the property of the sole customer to be served by the line.

23. In *Petition of Philadelphia Electric Company for Waiver of Siting Application Requirements under 52 Pa. Code § 57.71 for the proposed Middletown-Morton 230 kV Line*, Docket No. P-880293, 1988 Pa. PUC LEXIS 383, 67 Pa. PUC 52 (April 20, 1988), the Commission granted PECO's request to file a Letter of Notification for a 4.50 mile 230 kV transmission line. Approximately 4.05 miles of the proposed line would be built along railroad right-of-way, and the remaining 0.45 miles would be in right-of-way previously acquired by PECO from another utility. Citing prior decisions, Docket Nos. P-810309 and P-870228, the Commission found that PECO's use of established railroad right-of-way eliminated the need to acquire and clear new right-of-way and, thus, eliminated potential adverse environmental impacts and significantly reduced costs.

24. For the reasons described above, PPL Electric requests that the Commission approve this petition for waiver to provide for a more efficient method to file for siting and construction approval of the preferred route. Upon receipt of approval of this petition, PPL Electric will file with the Commission a Letter of Notification for approval to site and construct the proposed Elroy-Hatfield Taps.

25. If the Commission approves this Petition, allowing PPL Electric to proceed by means of a Letter of Notification instead of a full application, PPL Electric will still provide to the Commission information that will be more than adequate to decide whether to approve the siting and construction of the Elroy-Hatfield Taps. The principal difference between a Letter of Notification and a full Application is the level of detail required in selecting a route for the transmission line. A full Application under 52 Pa. Code §§57.72(c) requires, in addition to information required for a Letter of Notification, studies of the impacts of the transmission line on the environment, scenic areas, historic areas, land use, soil, sedimentation, plant and wildlife

habitat terrain, hydrology and landscape, descriptions of efforts to locate and identify archaeological, geologic and wilderness areas of significance, airports, alternative projects with their relative merits and detriments, and governmental agencies with jurisdiction over different aspects of the transmission project.

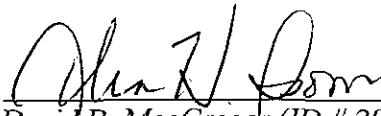
26. The need for such detailed information is much less with regard to the proposed Elroy-Hatfield Taps for the following reasons.

- a. The Taps are relatively short (2.03 miles) which will reduce their impacts.
- b. PPL Electric proposes to construct the Taps in an existing utility corridor which is already occupied by a much larger transmission line and which will minimize the incremental impacts of the Taps.
- c. Due to substantial residential development in the area which is shown on Attachment 1 hereto, there are no realistic alternative routes for the Taps.

D. CONCLUSION

WHEREFORE, PPL Electric respectfully requests that the Pennsylvania Public Utility Commission approve this Petition grant the waiver requested herein to permit PPL Electric Utilities Corporation to seek approval of the siting and construction of the Elroy-Hatfield Taps by means of a Letter of Notification instead of a full siting application.

Respectfully submitted,



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Of Counsel:
Post & Schell, P.C.

Date: October 25, 2010

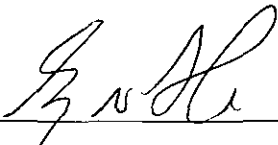
Attorneys for PPL Electric Utilities Corporation

VERIFICATION

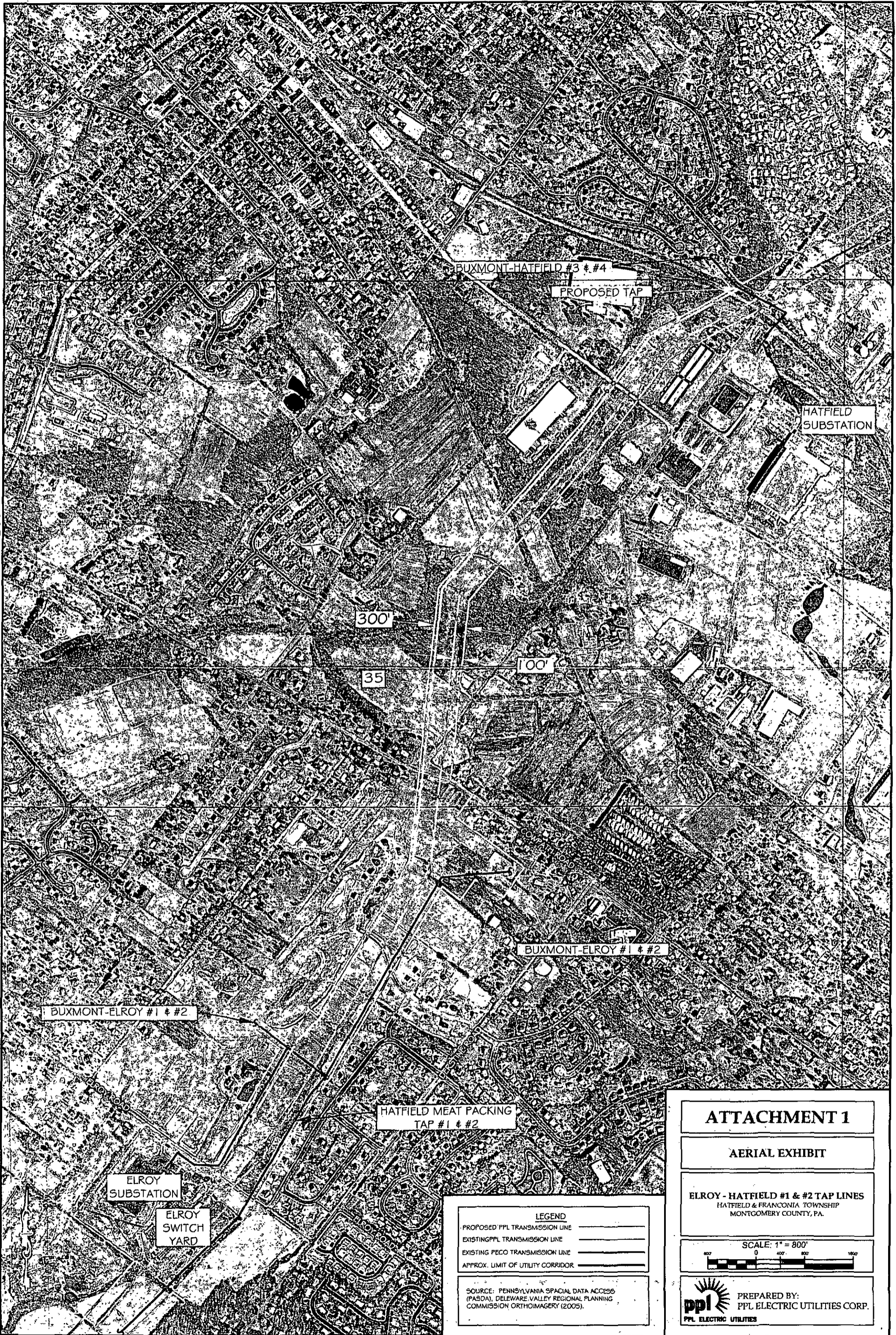
:

I, Gregory N. Dudkin, being the Senior Vice President Operations 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: 10/19/10



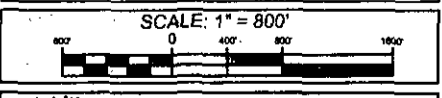
Gregory N. Dudkin



ATTACHMENT 1

AERIAL EXHIBIT

ELROY - HATFIELD #1 & #2 TAP LINES
 HATFIELD & FRANCONIA TOWNSHIP
 MONTGOMERY COUNTY, PA.

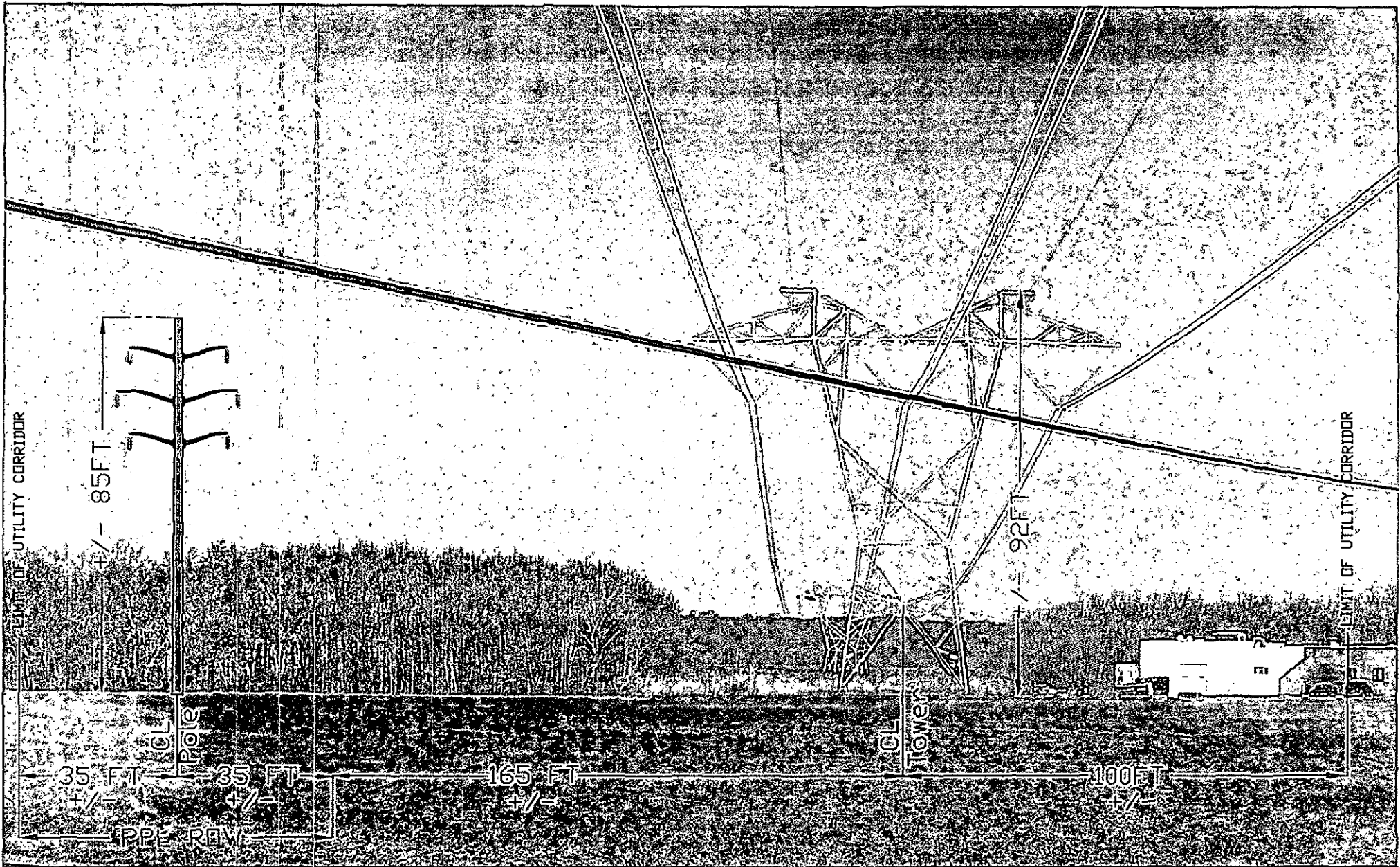


LEGEND

PROPOSED PPL TRANSMISSION LINE	
EXISTING PPL TRANSMISSION LINE	
EXISTING PECO TRANSMISSION LINE	
APPROX. LIMIT OF UTILITY CORRIDOR	

SOURCE: PENNSYLVANIA SPACIAL DATA ACCESS (PASDA), DELEWARE VALLEY REGIONAL PLANNING COMMISSION ORTHOIMAGERY (2005).

pppl PREPARED BY:
 PPL ELECTRIC UTILITIES CORP.
 PPL ELECTRIC UTILITIES



ATTACHMENT 2
PROPOSED UTILITY CORRIDOR CROSS SECTION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Petition of PPL Electric Utilities Corporation** 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

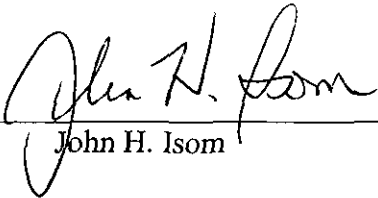
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John H. Isom