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John H. Isom

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File #: 2507/140066

November 1, 2010

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

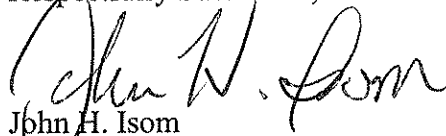
**RE: Petition of PPL Electric Utilities Corporation for a Finding that a Building to Shelter Control Equipment at the Blue Mountain 138-12 kV Substation to be Constructed in Moore Township, Northampton County, Is Reasonably Necessary for the Convenience or Welfare of the Public - Docket No. P-2010-2200410**

Dear Secretary Chiavetta:

Enclosed please find the original Prehearing Conference Memorandum of PPL Electric Utilities Corporation in the above-referenced proceeding.

Copies have been provided to the parties in the manner indicated on the Certificate of Service.

Respectfully Submitted,



John H. Isom

JHI/jl

Enclosures

cc: Honorable Ember Jandebaur  
Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **Prehearing Conference Memorandum 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**

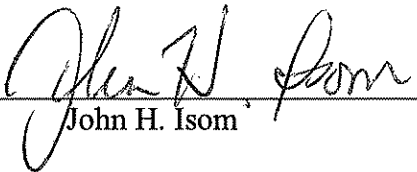
Northampton County  
Northampton County Government Center  
669 Washington Street  
Easton, PA 18042  
Attn: Mr. John Stoffa, County Executive

Lehigh Valley Planning Commission  
961 Marcon Boulevard, Suite 301  
Allentown, PA 18109  
Attn: Mr. Michael Kaiser, AICP, Executive Director

Moore Township Board of Supervisors  
2491 Community Drive  
Bath, PA 18041  
Attn: Mr. Maynard Campbell, Chair

Moore Township Planning Commission  
2491 Community Drive  
Bath, PA 18014  
Attn: Mr. Jason Harhart, Planning Director and Zoning Officer

Date: November 1, 2010

  
\_\_\_\_\_  
John H. Isom

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :  
Corporation for a Finding that a Building to :  
Shelter Control Equipment at the Blue :  
Mountain 138-12 kV Substation to be : Docket No. P-2010-2200410  
Constructed in Moore Township, :  
Northampton County, Is Reasonably :  
Necessary for the Convenience or Welfare :  
of the Public :

**PREHEARING CONFERENCE MEMORANDUM  
OF PPL ELECTRIC UTILITIES CORPORATION**

**TO ADMINISTRATIVE LAW JUDGE EMBER S. JANDEBEUR:**

PPL Electric Utilities Corporation (“PPL Electric”) hereby submits this Prehearing Conference Memorandum pursuant to the Prehearing Order that was issued by Administrative Law Judge Ember S. Jandebaur and dated October 18, 2010.

**I. SERVICE OF DOCUMENTS**

1. PPL Electric requests that all documents be served on:

John H. Isom  
Post & Schell, PC  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
Tel: 717-612-6032  
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PPL Electric agrees to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies be served upon Paul E. Russell at perussell@pplweb.com, David B. MacGregor at dmacgregor@postschell.com and Christopher T. Wright at cwright@postschell.com.

## II. PROCEDURAL HISTORY

2. On September 21, 2010, PPL Electric filed the “Letter of Notification of PPL Electric Utilities Corporation, Filed Pursuant to 52 Pa Code Chapter 57, Subchapter G, with Respect to the Blue Mountain No. 1 and No. 2 138kV Transmission Tap Lines in Moore Township, Northampton County, Pennsylvania” at Docket No. A-2010-2200439 (“Siting Application”). This Application is pending before the Commission.

3. On September 21, 2010, PPL Electric also filed the “Petition of PPL Electric Utilities Corporation for a Finding that a Building to Shelter Control Equipment at the Blue Mountain 138-12 kV Substation to be Constructed in Moore Township, Northampton County, Is Reasonably Necessary for the Convenience or Welfare of the Public” at Docket No. P-2010-2200410 (“Zoning Petition”), which is the subject of this proceeding. The proposed Blue Mountain Substation will be supplied by the Blue Mountain No. 1 and No. 2 138 kV Transmission Tap Lines.

4. The Siting Application and the Zoning Petition were served in accordance with the Commission’s regulations at 52 Pa. Code § 57.74 upon, *inter alia*, Moore Township and its planning commission and Northampton County and its planning commission.

5. On October 18, 2010, ALJ Jandebour entered a Prehearing Conference Order.

6. As of the date of this Prehearing Memorandum, no protests, complaints or petitions to intervene have been filed in either the zoning proceeding or the siting proceeding.<sup>1</sup>

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<sup>1</sup> If hearings are held regarding both the above-captioned zoning proceeding and the related siting proceeding, then they should be consolidated because they involve common issues of fact and law. If it is determined that hearings will be held in both proceedings, PPL Electric will promptly file a motion to consolidate the proceedings.

7. As explained in both the Siting Application and the Zoning Petition, the Blue Mountain Project, including the Taps and the substation, was reviewed with representatives of Northampton County, the Lehigh Valley Planning Commission, the Moore Township Board of Supervisors, and the Moore Township Planning Commission. These entities have no objection to the Blue Mountain Taps.

### **III. INFORMATION REQUESTED IN THE PREHEARING ORDER**

8. In the Prehearing Order, the ALJ directed that PPL Electric provide certain information in its prehearing conference memorandum. Below, PPL Electric complies with this directive.

a. Presently Identified Issues. The issue presented in this proceedings is as follows:

i. Is the proposed building to shelter control equipment at the Blue Mountain Substation reasonably necessary for the convenience or welfare of the public?

b. The Names and Addresses of the Witnesses. PPL Electric plans to call in support of the petition the following witnesses:

i. Kenneth B. Kuhns, whose business address is:

Two North Ninth Street  
Allentown, PA 18101

ii. William R. Keller, whose business address is:

Two North Ninth Street  
Allentown, PA 18101

c. The Proposed Area of Testimony of the Witnesses.

i. Mr. Kuhns will be testifying on the siting of the Blue Mountain Substation and the zoning ordinance of Moore Township, Northampton County, Pennsylvania.

ii. Mr. Keller will provide expert engineering testimony on the need for the Blue Mountain Substation and the control equipment building.

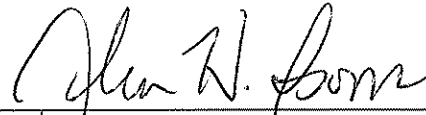
**IV. PROPOSED PROCEDURAL SCHEDULE**

9. PPL Electric will be prepared to discuss scheduling at the prehearing conference.

**V. DISCOVERY**

10. PPL Electric does not propose any modifications to the Commission's discovery rules for this proceeding. PPL Electric is willing to participate in informal discovery.

Respectfully submitted,



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Of Counsel:

Post & Schell, P.C.

Date: November 1, 2010

Attorneys for PPL Electric Utilities Corporation