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January 6, 2011

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

RECEIVED
2011 JAN -6 PM 4:07
PA PUC
SECRETARY'S BUREAU

RE: Letter of Notification of PPL Electric Utilities Corporation, Filed Pursuant to 52 PA Code, Chapter 57, Subchapter G, For Approval of the Reconstruction of the Pennsylvania Portion of the Manor-Graceton 230 KV Transmission Line in Manor Township, Lancaster County and in Chanceford, Lower Chanceford and Peach Bottom Townships in York County, Pennsylvania - Docket No. A-2011-

Dear Secretary Chiavetta:

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. Also enclosed is a CD containing copies of the exhibits and appendices, as well as a check in the amount of \$350 for the filing fee.

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

Respectfully Submitted,

John H. Isom

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, FOR APPROVAL OF :
THE RECONSTRUCTION OF THE :
PENNSYLVANIA PORTION OF THE :
MANOR-GRACETON 230 KV :
TRANSMISSION LINE IN MANOR :
TOWNSHIP, LANCASTER COUNTY :
AND IN CHANCEFORD, LOWER :
CHANCEFORD AND PEACH BOTTOM :
TOWNSHIPS IN YORK COUNTY, :
PENNSYLVANIA :**

Docket No. A-2010-_____

**RECEIVED
2011 JAN -6 PM 4: 07
PA PUC
SECRETARY'S BUREAU**

**LETTER OF NOTIFICATION OF
PPL ELECTRIC UTILITES CORPORATION**

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 reconstruction in place of the Pennsylvania portion of the Manor-Graceton 230 kV Transmission Line. In support thereof, PPL Electric states the following:

I. OVERVIEW

1. PPL Electric proposes to rebuild the Pennsylvania portion of the Manor-Graceton 230 kV Transmission Line (“Manor-Graceton Line”) which runs from the Manor Substation in Manor Township, Lancaster County, Pennsylvania, crosses the Susquehanna River below the Safe Harbor Dam and Hydroelectric Generating Station and traverses portions of Chanceford,

Lower Chanceford Townships and Peach Bottom Townships, York County, Pennsylvania to the southernmost transmission line structure in Pennsylvania, near the Pennsylvania-Maryland border. From the southernmost structure in Pennsylvania, the Manor-Graceton Line extends to the Graceton Substation in Maryland and is owned and operated by Baltimore Gas and Electric Company (“BG&E”).¹ PPL Electric intends to install a new structure between the current southernmost structure in Pennsylvania and the state border to transition the conductors from the proposed vertical configuration to the existing horizontal configuration.

2. PPL Electric proposes to rebuild all of the Pennsylvania portion of the Manor-Graceton Line, except for two spans and one structure. These two spans cross the Susquehanna River, and the structure is partially on an island in the River. These spans and the structure were rebuilt relatively recently, after they were damaged by ice floes in the 1972-73 winter.

3. The Manor-Graceton Line was built and placed in service in 1937 and is now 73 years old. It needs to be replaced because it has deteriorated substantially since it was placed in service. The foundations, the structure members, hardware, insulators, conductors and lightning protection all have been exposed to elements and are not capable of continuing to provide dependable service into the future.

4. PPL Electric proposes to minimize impacts of the Manor-Graceton Line by rebuilding it along its existing route and in the existing rights-of-way. The existing right-of-way is sufficient to accommodate the rebuilt Line and, in order to reduce the possibility of vegetation-related outages, has already been cleared of vegetation that could interfere with the operation of a high voltage transmission line.

¹ The portion of the Line owned and operated by BG&E is not the subject of this Application.

5. This Letter of Notification for the rebuilding of the Manor-Graceton Line is the first such filing of PPL Electric under its Vintage Conductor Program. Under this Program, PPL Electric has identified old and/or deteriorated transmission lines that require reinforcement in order for PPL Electric to continue to provide safe and reliable service to its customers. Most of the transmission lines in the Program were originally constructed in the 1920s and 1930s.

6. Presently, the structures for the Manor-Graceton Line are steel lattice towers. A detailed inspection of the structures has revealed that the concrete foundations are in poor condition and many would need to be replaced. Further, many steel members of the lattice structures are severely weakened by corrosion, bent or missing.

7. The Manor-Graceton Line has been part of PPL Electric's backbone bulk power system and has been relied upon in system planning for 73 years and is still required by PPL Electric to provide adequate and reliable service to customers. Abandoning the Line therefore is not a reasonable option.

8. PPL Electric analyzed whether it would be more appropriate to rehabilitate the Line or to rebuild it. PPL Electric determined that it would be slightly less expensive to rebuild the Line and that a rebuilt Line would have a much longer expected service life than a rehabilitated 73-year-old Line. It is therefore clearly more cost effective to rebuild the Line.

9. In addition, the rebuilt Line would have new conductors with substantially greater capacity, and the rebuilt Line will be constructed so that a second 230 kV circuit can be added in the future at relatively low cost and with relatively little adverse environmental impact when load growth makes it appropriate to do so.

II. INTRODUCTION

10. The Applicant is PPL Electric Utilities Corporation. Its principal address is:

Two North Ninth Street
Allentown, Pennsylvania 18101.

11. PPL Electric is a Pennsylvania corporation which supplies electric distribution and provider of last resort electric supply services pursuant to the regulatory jurisdiction of the Commission to approximately 1.4 million customers. Its service territory covers approximately 10,000 square miles in all or portions of twenty-nine counties in eastern and central Pennsylvania.

12. PPL Electric's attorneys are:

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

13. This Letter of Notification includes the following accompanying attachments:
- Attachment 1 Necessity Statement.
 - Attachment 2 Engineering Description.
 - Attachment 3 Siting Analysis and Environmental Assessment.
 - Attachment 4 Design Criteria and Safety Practices.
 - Attachment 5 Magnetic Field Management Practices.
 - Attachment 6 List of Involved Governmental Agencies, Municipalities and Other Public Entities.
 - Attachment 7 List of Property Owners within the Right-of-Way.
 - Attachment 8 Environmental Inventory Guidelines
 - Attachment 9 Land Use and Comprehensive Plan Assessment
 - Attachment 10 Historic Architectural and Archeological Sites
 - Attachment 11 References

This Letter of Notification and the Attachments listed above, which are incorporated herein by reference, provide all of the information required to be contained in a Letter of Notification under the Commission's regulations at 52 Pa. Code § 57.72(d) and the Commission's Interim Guidelines for the Filing of Electric Transmission Line Siting Applications at 52 Pa. Code §§ 69.3101 – 3107.

III. PROJECT SUMMARY

14. The Manor-Graceton Line will be located in Manor Township, Lancaster County and in Chanceford, Lower Chanceford and Peach Bottom Townships in York County. It is approximately 14.5 miles in length.

15. The Manor-Graceton Line originates at the Manor Substation in Manor Township, crosses the Susquehanna River below the Safe Harbor Dam and Hydroelectric Generating Station. The portion of the Line owned by PPL Electric terminates at the southernmost transmission structure in Pennsylvania.²

16. PPL Electric proposes to rebuild the Manor-Graceton Line except the existing structure which is situated in part on an island in the Susquehanna River and the spans on each side of this structure which cross the Susquehanna River. These facilities were rebuilt relatively recently, in 1973, after the prior structure and conductors were damaged by ice floes in the River. The only change in this portion of the Manor-Graceton Line will be that the overhead ground wire will be replaced.

17. The present Manor-Graceton Line has a single circuit and is supported by steel lattice structures which average 85 feet in height. The average span length is approximately 1,100 feet.

18. The rebuilt Line will be supported primarily by steel monopoles structures with upswept steel arms. The Line will be built initially for a single circuit but will be able to add a second circuit when future load growth makes it appropriate to do so.

19. Initially, angle structures may be single or two-pole structures depending on the severity of the angle. Additional poles may be added to some angle structures when a second circuit is added to the Line. Some angle structures may be guyed.

20. All poles will be installed on concrete foundations. The structures will average about 145 feet in height.

² The Manor-Graceton Line continues to the Graceton Substation, in Maryland, but this portion of the Line is owned and operated by BG&E and is not a subject of this Letter of Notification.

21. In total, the project will require the installation of approximately 70 structures. The average span length will be 1,100 feet. PPL Electric intends to construct the new poles adjacent to the existing lattice towers along the centerline of the right-of-way, although the location of some new structures may be shifted or adjusted slightly to reduce environmental impacts, due to engineering design requirements, or to accommodate reasonable requests from property owners. Present structures will be removed.

22. Pictures of the proposed types of structures to be used to rebuild the Manor-Graceton Line are provided in Figures 1 through 4 to Attachment 2, the Engineering Description.

23. There will initially be three 1,590 KCMIL,³ 45/7 stranding ACSR power conductors for the Line.⁴

24. Lightning protection initially will be provided by a 0.752 inch diameter optical ground wire with 48 single mode fibers. When a second circuit is added, an overhead shield wire, which will consist of ½ inch extra high strength steel, will be installed.

25. The minimum ground clearance will be 32 feet, which will occur at the maximum thermal conductor temperature of 125° C.

26. The Manor-Graceton Line will be designed and constructed to comply with, and will generally surpass, the applicable minimum standards established by the National Electric Safety Code (“NESC”).

27. The rebuilt Line will be constructed originally for a single circuit, but it will be designed and constructed to accommodate the addition of a second circuit when future load growth makes it appropriate to do so. Because the Line will be constructed to accommodate a

³ A circular mil is the cross-sectional areas of a wire one mil in diameter, where 1 KCMIL = 0.5067 mm².

⁴ Aluminum conductor steel reinforced.

future second circuit, PPL Electric will be able to add a second circuit at minimal cost and with minimal incremental impacts.

28. The estimated cost to rebuild the Line with one circuit is \$22,722,000.

29. Subject to the Commission's approval, construction of the project is scheduled to start in September, 2011, to meet an in service date of November, 2012.

IV. NECESSITY

30. The purpose of the Project is to rebuild the existing Manor-Graceton Line substantially in place. This Line is needed in order for PPL Electric to provide reliable service to customers. When the Line is temporarily out of service for maintenance, an unplanned outage of any nearby 230 kV line would cause other lines in the Manor, Otter Creek and Brunner Island area to become overloaded, which could lead to failure of the overloaded lines and substantial outages affecting numerous customers for substantial periods until repairs could be made. Permanently removing the Manor-Graceton Line from service would cause service in the Manor, Otter Creek and Brunner Island area to become unreliable and lead to substantial and prolonged service outages in the area.

V. REHABILITATE V. REBUILD

31. Because it is necessary for the Manor-Graceton Line to remain in service, PPL Electric undertook an analysis to determine whether the Line should be rebuilt or rehabilitated. The analysis included a detailed inspection of a statistically significant portion of the structures, 20 percent or 14 of 70, of the structures. The inspection revealed the following:

- a. Most of the structures have severe foundation conditions that require replacement.
- b. Many base plates are substantially corroded.

c. Many of the structures have bent, deformed or missing members, which reduce their ability to support conductors and hardware.

d. Most insulators are original and have reduced insulation levels due to long-term exposure to contaminants. The original insulators are well beyond their expected useful lives. All insulators and hardware need to be replaced due to age and deteriorated condition.

e. The grounding system at each structure leg would require upgrading by adding counterpoise.

f. All conductors need to be replaced due to their age and deteriorated condition.

g. The overhead shield wires require replacement due to age and conditions of the materials. In addition, the wires may have to be repositioned in order to bring the tower-line structures up to current lightning protection standards. Some line segments do not have the appropriate shielding angle, which makes the tower-line more susceptible to lightning strikes.

32. In order to determine whether the Line should be rehabilitated or rebuilt, PPL Electric evaluated the cost of each alternative. Based on the evaluation, PPL Electric concluded that it would be slightly less expensive to rebuild the Line rather than rehabilitate it.

33. Rebuilding the Line would provide additional benefits. First, the rebuilt Line would have a much longer expected useful life. A rebuilt Line with modern structures, conductors and hardware can be expected to remain in service for approximately 80 years. A rehabilitated Line, in contrast, with many portions of the structure already 73 years old could be

expected to remain in service for only about 30 years. As a result, the life cycle cost of rebuilding the Line is far less than rehabilitating the Line.

34. Rebuilding the Line also provides PPL Electric with the opportunity to build the Line to meet modern clearance requirements under the NESC and to implement its Electric and Magnetic Field Management Practices, increase the Lines' carrying capacity and provide for the addition of a second circuit at a minimal cost and with minimal impacts.

VI. SITING ANALYSIS

35. Once it was determined that the Manor-Graceton Line should be rebuilt, PPL Electric undertook an analysis to determine whether there was an alternative route that would have a lesser impact than rebuilding within the existing right-of-way on all factors of the natural and human environmental, while avoiding unreasonable routes, high or unnecessary costs and non-standard design requirements to the extent practical.

36. The first step in the siting analysis was to establish a Study Area. The selected Study Area encompasses approximately 90 square miles in Lancaster and York Counties. The Study Area generally is bounded by the point of origin for the Line, which is the Manor Substation in Manor Township, Lancaster County, to the north, the Lancaster side of the Susquehanna River to the east, the Pennsylvania-Maryland border along the existing Line to the south and a line running north and south approximately 1 mile west of the intersection of State Highways 425 and 74 to the west.

37. Next, the basic criteria for route selection were identified. The criteria consisted of the following:

- a. Minimize impacts to the natural and human environments.
- b. Minimize route length and cost.

- c. Use general line parameters specified by PPL Electric.
- d. Avoid residences.
- e. Minimize removal or barns, garages and other appurtenant structures.
- f. Maximize distances from residences, schools, cemeteries, historical resources, recreation areas and other important cultural sites.
- g. Minimize new crossings of designated natural resource lands such as state forests, national and state parks, wildlife management areas, designated same lands and wildlife areas and conservation areas.
- h. Avoid crossing large lakes.

PPL Electric strove to find routes that met these criteria to the extent practical.

38. The next step in the siting analysis was the identification of siting constraints. Constraints were divided into two groups based on the size of the constraints. The first group included constraints covering large areas of land or water in the Study Area. The second group of smaller constraints encompassed many other types of features covering smaller geographic areas or specific points. The constraint list was updated as the routing team developed greater familiarity with the Study Area. After potential alternative routes had been initially developed to avoid large area constraints, the alignments were adjusted to the extent practical to avoid small area constraints.

39. The siting process made extensive use of Geographic Information System (“GIS”) data. GIS data were obtained from official agency GIS data access websites and from government agencies. Additional data were created for the project either by digitizing information from paper-based maps or through aerial photo interpretation. GIS data allow for the consideration and efficient use of a wide variety of information that would otherwise be

unavailable or impractical to consider for a planning effort of this scope. GIS information is a highly effective tool when utilized for broad level planning studies, identifying and characterizing landscape level constraints and features and developing environmental inventory information for comparisons between planning alternatives.

40. PPL Electric then engaged in field inspections on July 15 and 16, 2010, in order to confirm and supplement data obtained from other sources. Alternative routes were observed from points of public access.

41. In addition, PPL Electric consulted with numerous federal, state and local governmental agencies in order to gather additional information.

42. Based upon a comprehensive evaluation of potential alternative routes within the Study Area, PPL Electric determined that no feasible alternative route exists to re-site the Manor-Graceton Line that would have a lesser impact than rebuilding the Line in place in the existing right-of-way. Use of the existing right-of-way will involve almost no additional clearing of vegetation since the right-of-way is already cleared. No condemnation of property will be required since PPL Electric already owns sufficient right-of-way for the Line. Although the existing right-of-way traverses some conservation areas, such resources are located throughout the Study Area. Therefore, any reasonable alternative route would have similar or greater incremental impacts. Most significantly, the most important environmental resources are along the Susquehanna River. The Manor-Graceton Line must cross the Susquehanna River. Crossing the River at any other point would cause far greater impacts to the environmental resources along the River than rebuilding in place, especially since the structure on an island in the River and the conductors that cross the River do not need to be replaced at this time. That is, there is no need to disturb the area along the River in order to rebuild the Line.

VII. IMPACTS ON NATURAL AND HUMAN ENVIRONMENTS

43. The rebuild of the Manor-Graceton Line will have only minimal impacts on the natural and human environments.

44. As explained in Attachment 3, no communication towers, pipelines, or other utilities will be affected by the proposed Manor-Graceton Line. Baublitz Airport is the nearest airport and is located approximately 5 miles from the project area. PPL Electric will contact the PennDOT Bureau of Aviation and the Federal Aviation Administration to ensure that the proposed Manor-Graceton Line will not be a hazard to flight operations.

45. The proposed Manor-Graceton Line was reviewed with the Pennsylvania Historical and Museum Commission (PHMC) Bureau of Historic Preservation. According to their Cultural Resource Geographic Information System (“CRGIS”), there are numerous cultural resources within two miles of the right-of-way. Historic architectural sites are dispersed relatively uniformly across the area, and archeological sites are concentrated along the Susquehanna River. There are no architectural or archeological sites within the right-of-way.

46. Effects on any historic architectural sites will be primarily visual resulting from the construction of taller structures. Use of taller structures, however, is not expected to have a substantially greater impact on the right-of-way because the existing lattice towers are complex construction with numerous crossbars and members and greater width. Further, rebuilding the Manor-Graceton Line in place in an existing, cleared right-of-way will result in lesser visual impacts on any historic resources than if a new line were constructed in an area where a line and cleared right-of-way do not already exist.

47. PPL Electric will consult with the PHMC throughout the planning, design, and construction process and conduct field work and surveys as necessary as part of the project

permitting process to minimize impacts to historic sites. Where adverse effects cannot be avoided, PPL Electric will prepare a mitigation plan in consultation with the PHMC.

48. Any direct physical effects will be minimized, where practical, by relocating access roads and staging areas. Any such effects that cannot be avoided will be only temporary.

49. Eight archeological sites have been noted within 1,000 feet of the centerline of the right-of-way. PPL Electric will conduct cultural resource studies of the construction areas for the Manor-Graceton Line in accordance with PHMC Guidelines for archaeological surveys. Any identified archaeological sites that may be adversely affected will be evaluated for eligibility for the National Registry of Historic Places.

50. All reasonable efforts will be made to avoid affecting archaeological resources. Where practical, any such resources in the transmission line corridor, in the direct path of access roads or at proposed work areas will be avoided by relocation of structure positions and rerouting of roads and reconfiguring or relocating work areas.

51. The Manor-Graceton Line will cross will cross 6 wetlands and 30 streams. In total, the right-of-way occupies 20.45 acres of wetlands and surface waters. No construction will occur within the Susquehanna River.

52. PPL Electric will use timber mats or other acceptable methods for any needed access road crossings of wetlands, and it is not anticipated that any structures would need to be placed in wetlands. If any access roads must cross through wetlands, PPL Electric will obtain all required permits and comply with all conditions imposed on the issuance of such permits.

53. Because PPL Electric proposes to rebuild the Manor-Graceton Line in an existing, cleared right-of-way, minimal tree clearing for the Line will be required. It is possible that there may be some minimal tree clearing for access roads and staging areas. If so, PPL Electric will

follow its current Vegetation Management Specification which is subject to change from time to time.

54. The route for the Manor-Graceton Line crosses or traverses near several special natural areas in both York and Lancaster Counties. The special natural areas may contain several threatened, rare, endangered species of flora.

55. The rebuild of the Line will not cause significant incremental disturbance of these areas because the right-of-way has already been cleared to accommodate the existing Line that will be replaced. Although existing access roads will be used in most areas, some vegetation clearing may be required. PPL Electric will minimize clearing in special natural areas and where threatened, endangered or rare species might be affected. Where appropriate, PPL Electric will consult with the Pennsylvania Department of Conservation and Natural Resources (“DCNR”) to develop a specific vegetation management plan for areas with potentially affected rare, endangered or threatened species.

56. PPL Electric has consulted with state and federal agencies to obtain information regarding endangered and threatened species in close proximity to the proposed Manor-Graceton Line.

57. The DCNR indicated that PPL Electric should conduct surveys regarding eight species presently listed or proposed to be listed in the Pennsylvania Natural Diversity Inventory (“PNDI”) as threatened or endangered. Three of the species, however, may be found only along the shores of the Susquehanna River. No survey is required unless it is expected that the shores will be disturbed. PPL Electric will conduct the requested surveys for the remaining five species and resolve all PNDI conflicts prior to construction.

58. Pennsylvania provides habitat for numerous species of wildlife, including certain rare, threatened or endangered species. Rebuilding the Line within the existing right-of-way will reduce, and perhaps eliminate, adverse impacts on wildlife habitat.

59. Areas near the right-of-way include potential habitat for several species of special concern, including the bald eagle, ospreys, prothonotary warblers, Indiana bats, bog turtles and red-bellied turtles.

60. In addition, the Pennsylvania Game Commission indicated that the great blue heron, a state species of special concern, might be present. In order to avoid potential disturbance of great blue heron nesting areas, PPL Electric will not engage in construction activities for the Line in Lancaster County or along the Susquehanna River from August 16 through February 14. The PFBC also indicated that the state threatened red-bellied turtle (*Pseudemys rubriventris*) is known to exist in the vicinity of the project. Since no work is planned within the Susquehanna River, and because PPL Electric anticipates being able to span any potential red-bellied turtle habitat, the project is unlikely to adversely impact the red-bellied turtle.

61. PPL Electric will conduct all required surveys and resolve all potential conflicts with rare, endangered and threatened species prior to starting construction.

VIII. HEALTH AND SAFETY

62. The rebuild of the Manor-Graceton Line will not cause any unreasonable risk to the health and safety of persons in its vicinity.

63. The Engineering Description of the proposed Manor-Graceton Line is provided in Attachment 2 accompanying this Letter of Notification.

64. The proposed Manor-Graceton Line will not create any unreasonable risk of danger to the public health or safety. The Manor-Graceton 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 NESC standards, PPL Electric's design criteria, and PPL Electric's safety practices are provided in Attachment 4 hereto.

65. Attachment 5 accompanying this Letter of Notification explains PPL Electric's standards for Electric and Magnetic Field Management.

66. In general, PPL Electric constructs its transmission lines with ground clearances greater than those required under the NESC in order to reduce electric and magnetic fields from transmission lines.

67. In addition, where feasible, PPL Electric will use reverse phasing techniques to reduce electric and magnetic fields. PPL Electric will evaluate the use reverse phasing techniques when a second circuit is added to the Line in the future.

68. Generally, PPL Electric will implement additional measures to reduce electric and magnetic fields where doing so can be accomplished at little or no cost and where the measures will not interfere with the operation of the transmission line.

69. The proposed Manor-Graceton Line was reviewed with representatives of Manor Township and Lancaster County, and with representatives of Chanceford, Lower Chanceford and Peach Bottom Townships and York County. None of the townships or counties objected to the Project.

IX. LETTER OF NOTIFICATION

70. 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 proposed rebuild of the Manor-Graceton Line qualifies for use of a Letter of Notification under 52 Pa. Code § 57.72(d)(1)(i) because the Manor-Graceton Line will be located entirely on an existing transmission line right-of-way and because the size, character, design or configuration of the

proposed Line will not substantially alter the right-of-way. The Line also qualifies for use of a Letter of Notification under 52 Pa. Code § 57.72(d)(1)(v) because it is to be reconstructed and because the size, character, design and configuration of the proposed Line will not substantially alter the right-of-way. The rebuild of the Manor-Graceton Line will not substantially alter PPL Electric's existing right-of-way for the following reasons:

a. The existing right-of-way is 150 feet wide, which is sufficient for the rebuilt Line. No additional right-of-way is required for the project.

b. Although the structures for the rebuilt Line will be taller than the structures for the existing Line, the rebuilt Line is not expected to have a substantially greater effect on the right-of-way. The present structures are steel lattice structures which have four supports and numerous, complex cross-members and braces. In contrast, most of the rebuilt structures will be monopoles with simple upswept arms to support the conductors.

c. In addition, the existing lattice towers are wider than the rebuilt structures. The existing lattice towers are approximately 57 feet in width. In contrast, the maximum width of the future monopole structures and the upswept arms will be approximately 20 feet for the initial single circuit construction and a width of approximately 38 feet after a second circuit is added.

d. The rebuilt structures will have a much smaller footprint on the right-of-way. Lattice towers require four foundations per structure, and the structures have a footprint of approximately 900 square feet. A modern monopole structure, in contrast, has a single foundation with a footprint of approximately 64 square feet.

IX. PROCEDURE

71. Attachment 6 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 Attachment 6 in accordance with 52 Pa. Code § 57.72(d)(3).

72. PPL Electric requests specifically that the Commission approve siting and rebuilding of the Manor-Graceton Line as described and the addition of a second circuit when future load growth makes the addition of a second circuit appropriate.

73. 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 Manor-Graceton Line. Such notice will contain: (a) the date this Letter of Notification was filed with the Commission; (b) a brief description of the proposed reconstruction project and its location; (c) locations where the complete Letter of Notification may be reviewed by the public; and (d) an instruction that the interested parties should contact Secretary Rosemary Chiavetta at the Commission's Harrisburg address.

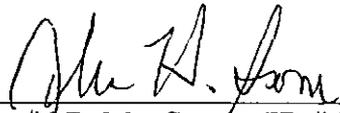
74. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the proposed Manor-Graceton Line will be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

X. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve the reconstruction of the Manor-Graceton Line in Manor Township, Lancaster and in Chanceford, Lower Chanceford and Peach Bottom

Townships in York County, Pennsylvania, as a double circuit line, as explained above and in the Attachments hereto.

Respectfully submitted,



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Date: Jan. 6, 2011

Attorneys for PPL Electric Utilities Corporation

VERIFICATION

I, Gregory N. Dudkin, being the Senior Vice President of Operations at 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: 1/3/2011



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 CERTIFIED MAIL RETURN RECEIPT REQUESTED

U.S. Army Corps of Engineers
Baltimore District- CENAB-OP-R
Regulatory Branch
P.O. Box 1715
Baltimore, MD 21203-1715

U.S. Fish and Wildlife Service
Pennsylvania Field Office
315 South Allen Street, Suite 322
State College, PA 16801-4850

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

Pennsylvania Department of Conservation
and Natural Resources
Rachel Carson State Office Building
PO Box 8767
400 Market Street
Harrisburg, PA 17105-8767

Pennsylvania Game Commission
2001 Elmerton Avenue
Harrisburg, PA 17110-9797

Pennsylvania Fish and Boat Commission
1601 Elmerton Avenue
PO Box 67000
Harrisburg, PA 17106-7000

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

Chanceford Township Board of Supervisors
P.O. Box 115
Muddy Creek Road
Brogue, PA 17309

Chanceford Township Planning Commission
P.O. Box 115
Muddy Creek Road
Brogue, PA 17309

Lancaster County Board of Commissioners
Office of the County Commissioners
150 North Queen Street
Suite 715
Lancaster, PA 17603

Lancaster County Planning Commission
150 North Queen Street
Suite #320
Lancaster, PA 17603

Lower Chanceford Township
Board of Supervisors
4120 Delta Road
Airville, PA 17302

Lower Chanceford Township
Planning Commission
4120 Delta Road
Airville, PA 17302

Manor Township Board of Supervisors
950 West Fairway Drive
Lancaster, PA 17603

Manor Township Planning Commission
950 West Fairway Drive
Lancaster, PA 17603

Peach Bottom Township Board of Supervisors
545 Broad Street
Delta, PA 17314

Peach Bottom Township Planning Commission
545 Broad Street
Delta, PA 17314

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

York County Board of Commissioners
28 East Market Street
Room 216
York, PA 17401

York County Planning Commission
28 East Market Street
Room 301
York, PA 17401

Pennsylvania Lines LLC
c/o Norfolk Southern Railway Co
110 Franklin Rd SE
Roanoke, VA 24042

Safe Harbor Water Power Co
1 Powerhouse Rd
Conestoga, PA 17516

Joyce A Heffner
1560 Furnace Rd
Brogue, PA 17309

Brook Run Farms
509 Letort Road
Washington Boro, PA 17582

Commonwealth of Pennsylvania
400 Market Street, 7th Floor
Harrisburg, PA 17105 8767

Leroy D. & Jewel O. Good
10852 Kline Rd
Brogue, PA 17309

Commonwealth of Pennsylvania
State Capitol
Harrisburg, PA 17120

Emanuel S. & Annie S. Esh
508 Furnace Rd
Airville, PA 17302

Kevin M. & Cindy Jo Riedel
565 Furnace Rd
Airville, PA 17302

David L. & Christine Y. Druck
2243 Woodbine Rd
Airville, PA 17302

PECO Energy Company
Attn: Real Estate Dept N3 3
2301 Market St 16Th Flr
Philadelphia, PA 19103

R. Leon. Jr. & Marlene J. Kilgore
79 Kilgore Rd
Airville, PA 17302

Marvin H. & Shirley M. Burton
3737 Delta Rd
Airville, PA 17302

Robert M. & Lois M. Jordan
3932 Delta Rd
Airville, PA 17302

Robert M & Lois M Jordan
12640 Collinsville Rd
Brogue, PA 17309 9089

Lois A Manifold
3801 Delta Rd
Airville, PA 17302

William F. & Rita R. Dalton
3890 Delta Rd
Airville, PA 17302

Gregory A. & Donna S. Kennard
1277 Bridgeton Rd
Airville, PA 17302

Jay D., Sr. & Sharon Sue Caudill
48 Salisbury Rd
Airville, PA 17302

James D. & Lena M. Caudill
118 Walnut St
Columbia, PA 17512

Dallas F. & Mabel J. Caudill
Revocable Living Trust
162 Reinecke Rd
Airville, PA 17302

Allison D Wolfe
119 Reinecke Rd
Airville, PA 17302

David D. & Rachel B. Esh
40 Frogtown Rd
Paradise, PA 17562

George N. & Joan L. Bair
216 Atkins Rd
Airville, PA 17302

Elam H. & Annie B. Esh
209 Telegraph Rd West
Airville, PA 17302

Joe & Krista McCollum
594 Cook Road
Delta, PA 17314

Hendrzak
533 Hollow Rd
Delta, PA 17314

William M., Jr. & Donna O. Hanna
2614 Whiteford Rd
Whiteford, MD 21160

Mark E. & Melanie Hawkins
384 Hollow Rd
Delta, PA 17314

George R. & Jocelyn J. Butler
2805 Whiteford Rd
Whiteford, MD 21160

Anthony J. Alexander, CEO
Metropolitan Edison Company
76 South Main Street
Akron, OH 44308

D.P. O'Brien, President
PECO Energy Distribution Company
2301 Market Street
Philadelphia, PA 19101

Henry K. & Elizabeth H. Esh
334 W Telegraph Rd
Airville, PA 17302

Dana E. & Verna E. Holmes
325 W Telegraph Rd
Airville, PA 17302

James & Chong S. Reheard
333 W Telegraph Rd
Airville, PA 17302

Gene A. & Linda L. Woods
346 W Telegraph Rd
Airville, PA 17302

Clyde M & Pearl L Holloway
349 W Telegraph Rd
Airville, PA 17302

Tayacres Farm
183 Buecker Rd
Delta, PA 17314

Joseph H., Sr. & Ada May Koeper, Trustees
Revocable Trust
3139 White Hall Rd
White Hall, MD 21161

Roger Cooper
1154 Flintville Rd
Delta, PA 17314

Paul W. & Laura A. Chambers Herzog
7 Pancoast Rd
Waretown, NJ 08758

Glenn J Bradley
8178 Woodbine Rd
Airville, PA 17302

Chris A., Jr. & Joan L. Parrow
8133 Woodbine Rd
Airville, PA 17302

Priscilla D. Knight
322 Murphy Rd
Airville, PA 17302

Douglas F. & Nancy H. Hankey
530 Murphy Rd
Airville, PA 17302

David E & Martha H Gemmill
458 Gemmill Rd
Delta, PA 17314

Dana M. & Kenneth W., Smith, Jr.
37 Windy Farm Ln
Delta, PA 17314 8004

Victor J., Jr. & Janet L. Renzi
63 Windy Farm Ln
Delta, PA 17314

David S., Sr. & Catherine M. Bilger
183 Gemmill Rd
Delta, PA 17314

Amos H. & Mary Ann Miller
299 Aabel Rd
Delta, PA 17314

Craig A. & Jennifer K. Metzler
1348 Bryansville Rd
Delta, PA 17314 9243

Date: January 6, 2011

Donald E. Davis, Jr.
123 Clubhouse Rd
Delta, PA 17314

Winfred E. & Virginia W. Fennell
828 Northpoint Rd
Baltimore, MD 21224

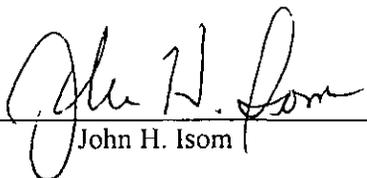
James M. & Rebecca H. Gjerdahl
103 Clubhouse Rd
Delta, PA 17314

S. Smith Fulton
1842 Bryansville Rd
Delta, PA 17314

Brothers Gross
749 Graceton Rd
Fawn Grove, PA 17321

Michael L. & Geraldine M. Sacilotto
1274 Line Rd
Delta, PA 17314

Robert A. & Carolyn J. Lemen
578 Cook Road
Delta, PA 17314



John H. Isom