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File #: 2507/140066

March 8, 2011

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: Letter Of Notification Of PPL Electric Utilities Corporation, Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G, For Expedited Approval To Replace Electric Utility Poles On The West Shore-Steelton 230 kV Transmission Line In Upper And Lower Allen Townships, Cumberland County and Fairview Township, York County, Pennsylvania - Docket No. A-2010-2217602**

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Dear Secretary Chiavetta:

Enclosed for filing is the Petition of PPL Electric Utilities Corporation to Withdraw Letter of Notification and Terminate the Proceeding in the above-referenced proceeding.

Respectfully Submitted,

John H. Isom

JHI/jl

Enclosures

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification Of PPL Electric :  
Utilities Corporation, Filed Pursuant To 52 :  
Pa. Code Chapter 57 Subchapter G, For : Docket No. A-2010-2217602  
Expedited Approval To Replace Electric :  
Utility Poles On The West Shore-Steelton :  
230 kV Transmission Line In Upper And :  
Lower Allen Townships, Cumberland :  
County and Fairview Township, York :  
County, Pennsylvania :

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**PETITION OF PPL ELECTRIC UTILITIES CORPORATION  
TO WITHDRAW LETTER OF NOTIFICATION AND TERMINATE THE  
PROCEEDING**

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**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

PPL Electric Utilities Corporation (“PPL Electric”) hereby petitions Pennsylvania Public Utility Commission (“Commission”), pursuant to its Rules of Administrative Practice and Procedure, 52 Pa. Code § 1.82, which govern withdrawal or termination of an uncontested proceeding, for leave to withdraw its above-captioned Letter of Notification and terminate this proceeding. In support of its Petition, PPL Electric states as follows:

1. The Letter of Notification was filed with the Commission on December 27, 2010.
2. In the Letter of Notification, PPL Electric sought the Commission’s approval, pursuant to 52 Pa. Code Chapter 57, Subchapter G, for the replacement of Cellon-treated wood

poles in the existing West Shore-Steelton 230 kV Transmission Line in Upper and Lower Allen Townships in Cumberland County and Fairview Township, York County.<sup>1</sup>

3. The Commission's regulations at 52 Pa. Code Chapter 57, Subchapter G require prior approval "to locate and construct a HV [high voltage] transmission line or any portion thereof . . . ." 52 Pa. Code § 57.71.

4. For the reasons explained below, based upon changes in circumstances, PPL Electric has concluded that the pole replacement project for the West Shore-Steelton 230 kV Line is a maintenance project for an existing transmission line, and not the location and construction of a transmission line. Therefore, the West Shore-Steelton pole replacement project, as revised, does not require Commission approval pursuant to the Commission's regulations at 52 Pa. Code Chapter 57, Subchapter G.

5. When PPL Electric filed the Letter of Notification, PPL Electric believed that a significant number of the poles would have to be relocated in order to obtain environmental permits for performing work in wetlands.

6. Since filing the Letter of Notification, PPL Electric has worked with the Pennsylvania Game Commission, the Pennsylvania Department of Conservation and Natural Resources and the United States Fish and Wildlife Commission. In working with these agencies, it was determined that that only three of the 107 poles to be replaced require wetland permits, and none of the poles will have to be relocated. Instead, new poles will be installed adjacent to the existing poles.

7. Based on the current status of the project as revised, PPL Electric has concluded that this pole replacement project constitutes maintenance of an existing transmission line, does

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<sup>1</sup> A small portion of the Line is located in the Borough of Steelton in Dauphin County. The poles in this portion of the Line, however, are custom-designed steel poles that are not of the type that require replacement, and therefore those poles were not a subject of the Letter of Notification.

not constitute the location and construction of a new transmission line and ,therefore, does not require Commission approval. For example, if an HV transmission pole is damaged in a motor vehicle accident, PPL Electric and, to its knowledge, every other Pennsylvania electric distribution company replaces poles under such circumstances without seeking prior Commission approval. Because the West Shore-Steelton pole replacement project, as revised, will require only “in place” replacements with no changes to the right-of-way, PPL Electric believes that it does not involve “location and construction” of the Line.

8. In support of its Petition to Withdraw its Letter of Notification and Terminate this Proceeding, PPL Electric notes that it has served copies of the Letter of Notification on all affected property owners. In addition, PPL Electric served copies of the Letter of Notification on all townships and counties where poles will be replaced and their respective planning commissions. No property owner or governmental agency has voiced any objection to the pole replacement project.

9. No person or entity has filed any protest, intervention or complaint against the West Shore-Steelton pole replacement project. Therefore, there are no parties to the proceeding other than PPL Electric.

10. Pursuant to 52 Pa. Code § 1.82(a), if no objection to the Petition to Withdraw the above-captioned Letter of Notification and Terminate this Proceeding is filed within 10 days of service, the Petition may be granted.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation withdraws its Letter of Notification in the above-captioned proceeding, and requests that the Commission terminate the proceeding.

Respectfully submitted,



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Dated: March 8, 2011

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