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File #: 2507/140066

April 29, 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 APR 29 PM 3:55  
PA PUC  
SECRETARY'S BUREAU

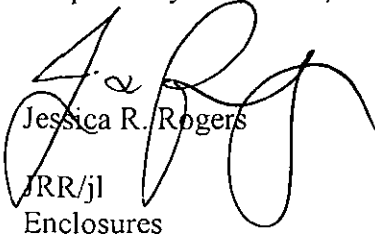
**RE: Letter of Notification of PPL Electric Utilities Corporation, Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, With Respect To The Elroy - Hatfield #1 & #2 138/69 kV Transmission Lines Located In Hatfield And Franconia Townships, Montgomery County, Pennsylvania - Docket No. A-2011-**

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 attachments which are contained in a separately-bound volume in the above-referenced proceeding. Also enclosed is a CD containing copies of the attachments.

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 any questions concerning this matter, please contact me at the address or telephone numbers provided above.

Respectfully Submitted,

  
Jessica R. Rogers  
JRR/jl  
Enclosures

April 29, 2011

Page 2

cc: Robert F. Young  
Paul T. Diskin  
Nicholas Okoro

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**RECEIVED**  
**2011 APR 29 PM 3:56**  
**PA PUC**  
**SECRETARY'S BUREAU**

Re: Letter Of Notification Of PPL Electric :  
Utilities Corporation, Filed Pursuant To 52 :  
Pa. Code Chapter 57 Subchapter G, With : Docket No. A-2011-\_\_\_\_\_  
Respect To The Elroy – Hatfield #1 & #2 :  
138/69 kV Transmission Lines Located In :  
Hatfield And Franconia Townships, :  
Montgomery County, Pennsylvania :

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**LETTER OF NOTIFICATION REQUESTING APPROVAL FOR  
THE SITING AND CONSTRUCTION OF THE  
ELROY – HATFIELD #1 & #2 138/69 kV TRANSMISSION LINE**

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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 siting and construction of the Elroy – Hatfield #1 and #2 138/69 kV Transmission Line (“Elroy – Hatfield Transmission Line”). The use of a Letter of Notification for this project was approved by the Commission in an Order entered on February 10, 2011 at Docket No. P-2010-2206466. The project, which will consist of approximately 2.03 miles of new 138/69 kV transmission line, will be constructed in Hatfield and Franconia Townships, Montgomery County, Pennsylvania. In support thereof, PPL Electric states as follows:

**I. INTRODUCTION AND OVERVIEW**

1. This Letter of Notification is filed by PPL Electric, a public utility that provides electric distribution, transmission, and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission.

2. PPL Electric's address is:

Two North Ninth Street  
Allentown, Pennsylvania 18101

3. PPL Electric's attorneys are:

David B. MacGregor (Pa. Bar I.D. #28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
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E-mail: perussell@pplweb.com

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

4. PPL Electric furnishes electric service to 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. 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.

5. PPL Electric owns approximately 5,000 miles of transmission lines operating at 69 kV (kilovolts) or higher, approximately 375 substations with a capacity of 10 MVA (megavolt amperes) or more, and approximately 43,000 miles of distribution lines operating at less than 69 kV.

6. This Letter of Notification includes the following accompanying attachments:

- Attachment 1 Necessity Statement.
- Attachment 2 Engineering Description.
- Attachment 3 Environmental Assessment.
- Attachment 4 PPL Electric Design Criteria and Safety Practices.
- Attachment 5 PPL Electric Magnetic Field Management Program.
- Attachment 6 List of Owners of Property within the Right-of-Way
- Attachment 7 List of Involved Governmental Agencies, Municipalities, and Other Public Entities.

7. PPL Electric proposes to construct the Elroy – Hatfield #1 & #2 138/69 kV Transmission Line. The proposed line will exit the existing Elroy 500 – 138 – 69 kV Substation and will extend approximately 2.03 miles to the existing Buxmont – Hatfield #3 & #4 138/69 kV Transmission Line just north of the existing Hatfield 69 – 12 kV Substation. PPL Electric requires the new transmission line in order to increase reliability of service to approximately

33,000 customers in Bucks and Montgomery Counties. The Transmission Line will be designed and constructed for 138 kV operation but will initially operate at 69 kV.

8. The proposed Elroy – Hatfield Transmission Line will be 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. There is already a larger single-circuit 500 kV transmission line in the corridor, which is owned and operated by PECO. Therefore, PPL Electric anticipates that the incremental visual impacts of the Project will be minimal.

9. The estimated cost to design and construct the transmission line is \$4.25 million. Construction is scheduled to begin in June 2012, in order to meet a May 2013 in-service date.

10. This project will be constructed at the same time as the new 500 kV transmission tie line between PECO’s Elroy 500 kV switchyard and PPL Electric’s 500-138-69 kV Elroy Substation. A Letter of Notification for the proposed 500 kV transmission tie line is being submitted concurrently with this submission. Although the two projects both involve the PPL Electric 500-138-69 kV Elroy Substation, they have different purposes. The purpose of the Elroy – Hatfield Transmission Line is to relieve load on the 138/69 kV transmission lines in the area. The purpose of the 500 kV Elroy Tie Line is to supply an additional transformer at the 500-138-69 kV Elroy Substation in order to relieve load on the transformers presently in service at the substation.

## **II. PROJECT SUMMARY**

11. The proposed Elroy – Hatfield Transmission Line will be located in portions of Hatfield and Franconia Townships, Montgomery County, Pennsylvania. An aerial plot plan is

provided in the map pocket of Attachment 2 of this Letter of Notification. The plot plan depicts the location of the existing and proposed facilities.

12. The proposed Elroy – Hatfield Transmission Line will involve the construction of a new, 2.03 mile long, 138/69 kV transmission line from the existing Elroy 500 – 138 – 69 kV Substation to the existing Buxmont – Hatfield #3 & #4 138/69 kV Transmission Line just north of the existing Hatfield 69 – 12 kV Substation. As explained below, the purpose of the proposed transmission line is to reduce load on the transmission lines currently serving the area in order to increase the reliability of service to customers in the area.

13. PPL Electric’s Elroy Substation feeds two 69 kV Lines. These two 69 kV Lines are named the Buxmont - Elroy #1 & #2 69 kV Lines and serve approximately 18,000 customers in Hatfield and Lansdale Boroughs, and Hatfield, Franconia, and West Rockhill Townships. PPL Electric’s Buxmont Substation has two 230-69 kV transformers which feed six 69 kV Lines. Two of those lines, the Buxmont - Hatfield #3 & #4 69 kV Lines, serve approximately 15,000 customers in Sellersville Borough and Hilltown, West Rockhill, Franconia, and Hatfield Townships.

14. PPL Electric has adopted its Reliability Principles and Practices (“RP&P”) in order to guide its planning processes and to establish standards for its transmission and distribution systems which will enable it to provide safe and reliable service at a reasonable cost. PPL Electric relies on the standards set forth in the RP&P for guidance in determining when it is appropriate to reinforce its transmission and distribution systems.

15. By the summer of 2013, PPL Electric will not be able to transfer load from one line to another for load relief during periods of peak demand or during scheduled or unscheduled outages on the Buxmont - Hatfield 69 kV Lines. Specifically, loss of the Buxmont - Hatfield #4

69 kV Line would load the Buxmont - Hatfield #3 69 kV to 100% of its summer emergency rating of 124 MVA. Loss of the double-circuit Buxmont - Hatfield #3 & #4 69 kV Lines would initially interrupt approximately 125 MW of load, affecting approximately 15,000 customers, in Bucks and Montgomery Counties.

16. The lost load would exceed the maximum acceptable load interruption guidelines identified in PPL Electric's RP&P. Restoration efforts would be limited by insufficient conductor capacity on the existing Buxmont - Elroy #1 and #2 69 kV Lines.

17. Constructing the new Elroy - Hatfield Transmission Lines from the Elroy Substation, and resectionalizing the circuits, will relieve both the Buxmont - Elroy #1 & #2 and Buxmont - Hatfield #3 & #4 69 kV Lines. This reinforcement will allow for improved transfer capability between Elroy and Buxmont Substations for load restoration. Approximately 33,000 customers served from these electric facilities in Bucks and Montgomery Counties will experience increased reliability of service.

18. Figure 1 to Attachment 1 of this Letter of Notification provides a one-line diagram of the existing system.

19. Figure 2 to Attachment 1 of this Letter of Notification provides a one-line diagram of the proposed Elroy - Hatfield #1 and #2 Transmission Lines, which would connect the existing Elroy Substation to the Buxmont - Hatfield #3 & #4 Transmission Lines.

20. The Elroy - Hatfield Transmission Lines will consist of approximately 2.03 miles of new double-circuit 138/69 kV line. The line will be designed and constructed for 138 kV operation, although it will be operated initially at 69 kV. The transmission line will be converted to 138 kV operation when future load increases make it appropriate in order to maintain service reliability.

21. The proposed Elroy – Hatfield Transmission Line will require installation of approximately 27 steel monopoles, which will have an average height of approximately 85 feet and an average span of 450 feet. The proposed steel monopoles will be either direct embedded or installed on concrete foundations. In addition, two existing poles adjacent to the Elroy Substation will be relocated as part of this project in order to accommodate the addition of the new transmission line.

22. The proposed transmission line will consist of six power conductors and one overhead ground wire. The power conductors will be 556.5 kcmil,<sup>1</sup> 24/7 strand ACSR<sup>2</sup> and one 0.562” optical ground wire (“OPGW”). The overhead ground wire will provide lightning protection for the proposed transmission line.

23. Two self-supporting high-low tap poles will be placed near the connection point near the Hatfield Substation. See Figure 3. These two tap poles will likely be placed on concrete foundations. The tap poles will be used to tie the new line into the existing Buxmont - Hatfield #3 & #4 lines. These poles are at two different heights in order to allow clearance for one circuit to pass over the other at this “T” point where these lines meet.

24. Five new load sectionalizing air brake switches (“LSABs”) and associated poles will be added on the existing transmission lines located near the Elroy and Hatfield substations to sectionalize the lines in this area.

25. The Elroy – Hatfield #1 and #2 Transmission Lines will be designed to comply with, and will generally surpass, the applicable minimum standards in the National Electrical Safety Code (“NESC”).

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<sup>1</sup> A kcmil is a thousand circular mils. A circular mil is the cross-sectional area of a wire one mil in diameter, where 1 kcmil = 0.5067 mm<sup>2</sup>.

<sup>2</sup> Aluminum conductor steel reinforced.

26. PPL Electric will utilize reverse phasing in the construction of the Elroy – Hatfield Transmission Line, in order to reduce magnetic fields.

27. The total estimated cost to site, design and construct the proposed project is \$4.25 million.

28. Construction is scheduled to begin in June 2012 in order to meet the in-service date of May 2013.

29. The proposed Elroy – Hatfield Transmission Line will be constructed entirely in an existing utility corridor, on property owned in fee by PPL Electric or PECO, and on rights-of-way held by PPL Electric or PECO. No additional rights-of-way are required. PPL Electric has entered into an agreement with PECO under which PPL Electric is permitted to occupy PECO's land and rights-of-way in the utility corridor.

30. Because the proposed Elroy – Hatfield Transmission Line will be constructed entirely within an existing, cleared, utility corridor which already contains a larger single circuit 500 kV transmission line, PPL Electric anticipates that the proposed construction of the Elroy-Hatfield #1 and #2 Transmission Lines will have minimal incremental impacts on the area.

31. Accompanying this Letter of Notification is a separately bound volume containing Attachments 1-7, which provide additional information about the proposed Elroy – Hatfield Transmission Line. This Letter of Notification and accompanying Attachments, which are incorporated herein by reference, contain all the information required by 52 Pa. Code § 57.72(d)(4).

### **III. LETTER OF NOTIFICATION**

32. 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

Commission approved the use of a Letter of Notification for the proposed construction of the Elroy – Hatfield #1 and #2 Transmission Lines in an Order entered on February 10, 2011 at Docket No. P-2010-2206466.

33. The Necessity Statement for the proposed construction of the Elroy – Hatfield Transmission Line is provided as Attachment 1 accompanying this Letter of Notification. As explained therein, the purpose of the proposed Elroy – Hatfield Transmission Line is to increase reliability of service and load restoration and transfer capacity in the case of an outage.

34. In determining the need for the project, PPL Electric considered converting the Elroy-Hatfield 69 kV lines to 138 kV as an alternative project. However, this alternative would have been considerably more expensive than adding additional transformation at the Elroy Substation

35. The proposed Elroy – Hatfield Transmission Line will not create any unreasonable risk of danger to public health or safety. The Elroy – Hatfield Transmission 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.

36. The Engineering Description of the proposed Elroy – Hatfield Transmission Line is provided in Attachment 2 accompanying this Letter of Notification.

37. The proposed Elroy – Hatfield Transmission Line will be located on property owned in fee by PPL Electric, right-of-way held by PPL Electric, property owned in fee by PECO, and right-of-way held by PECO. PPL Electric has entered into an agreement with PECO

relating to the use of its property and rights-of-way. PPL Electric does not need to acquire any additional rights-of-way for this project.

38. One railroad crossing will be required over a Southeast Pennsylvania Transportation Authority (SEPTA) rail line near the northern terminus of the line.

39. No communication towers, pipelines, or other utilities will be affected by the proposed Elroy – Hatfield Transmission Line. The nearest airport is approximately 5.8 miles from the project area. Impacts to this airport are not expected due to the distance between the project and the airport, and the fact that the existing, larger 500 kV transmission line in the same utility corridor does not cause any interference. PPL Electric will file the appropriate documents with the Federal Aviation Administration and PennDOT Bureau of Aviation to confirm that the proposed transmission line will not be a hazard to the airport’s flight operations.

40. The proposed Elroy – Hatfield Transmission Line was reviewed with the Pennsylvania Historical and Museum Commission (“PHMC”). The PHMC has determined that there are no anticipated impacts to National Register eligible or listed historic sites or to archaeological sites. No further investigations are required.<sup>3</sup>

41. The proposed Elroy – Hatfield Transmission Line will not affect any unique geological, scenic, or natural areas. The recreational areas located nearest to the project site include two small, local parks, which are approximately 0.5 miles and 0.9 miles from the project site. There are no anticipated impacts to these features because the proposed transmission line will be constructed adjacent to an existing 500 kV transmission line within the established utility corridor. In addition, the distance from the project area to the parks and the existing vegetative buffer between the project area and the parks will reduce any impact.

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<sup>3</sup> The applicable File Number ER 10-1181-091-A.

42. The Elroy – Hatfield #1 and #2 Transmission Lines will cross 6 wetlands and 2 streams. All wetlands and waters are easily spanned. Therefore, no impacts to these features are anticipated. PPL Electric will obtain all required permits from the Pennsylvania Department of Environmental Protection and the United States Army Corps of Engineers prior to construction and will comply with all conditions placed on those permits. In addition, PPL Electric will obtain any required soil erosion and sedimentation control permits and comply with conditions placed on those permits.

43. The use of an existing utility corridor will allow PPL Electric to avoid widespread tree clearing. Some localized tree clearing will be required along the edges of the utility corridor. In addition, some brush removal and limited tree clearing may be required to access certain work areas. PPL Electric will apply its “Specifications for Initial Clearing and Control of Vegetation on or Adjacent to Electric Right-of-Way Through Use of Herbicides, Mechanical, and Hand Clearing Techniques” when performing these activities.

44. PPL Electric has consulted with state and federal agencies to obtain information regarding endangered and threatened species in close proximity to the proposed Elroy – Hatfield Transmission Line.<sup>4</sup> A review of the Pennsylvania Natural Diversity Inventory (“PNDI”) records indicates that the project will have no impact on threatened and endangered species and/or special concern species and resources. The proposed Elroy – Hatfield Transmission Line will not create any risk to endangered or threatened species.

45. Because wetlands are present on the project site, PPL Electric contracted URS Corporation to conduct a bog turtle habitat assessment to identify whether the wetlands in the utility corridor provide habitat for bog turtles. Results of this assessment indicated that, although

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<sup>4</sup> The PNDI Search ID for this project is 20100318234513.

there was typical vegetation and spring fed hydrology, the wetlands did not contain the mucky soil that bog turtle habitat requires. Therefore, there are no bog turtles within the right-of-way.

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

47. PPL Electric provided information describing the project to Hatfield and Franconia Townships and Montgomery County, and neither the Townships nor the County objected to the project. Attachment 7 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 7 in accordance with 52 Pa. Code § 57.72(d)(3).

48. 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 modification to the Elroy – Hatfield Transmission Line. Such notice will contain: (a) the date this Letter of Notification was filed with the Commission; (b) a brief description of the proposed 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 persons should contact the Commission at its Harrisburg address.

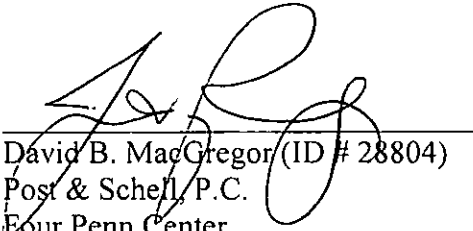
49. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the proposed Elroy – Hatfield Transmission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

**IV. CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve the proposed Elroy – Hatfield #1 and #2 138/69 kV Transmission Line in Hatfield and Franconia Townships, Montgomery County, Pennsylvania, that is explained above and in the Attachments hereto.

Respectfully submitted,

Paul E. Russell (ID # 21643)  
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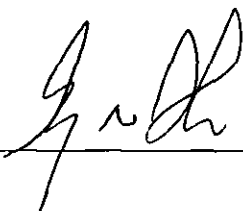
Date: 4/29/11

Attorneys for PPL Electric Utilities Corporation

## VERIFICATION

I, Gregory N. Dudkin, being the Sr. Vice President of Operations for 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: 4/27/11

  
\_\_\_\_\_

## 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

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

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

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

Montgomery County Commissioners  
Montgomery County Courthouse  
PO Box 311  
Norristown, PA 19404-0311  
Attn: Mr. James R. Matthews, Chairman

Montgomery County Planning Commission  
Montgomery County Courthouse  
PO Box 311  
Norristown, PA 19404-0311  
Attn: Mr. P. Gregory Shelly, Executive Director

Franconia Township  
671 Allentown Road  
Telford, PA 18969-2205  
Attn: Mr. Kevin D. Baver,  
Township Manager

Franconia Township  
Board of Supervisors  
671 Allentown Road  
Telford, PA 18969-2205  
Attn: Mr. Steven P. Barndt, Chairman

Franconia Township  
Planning Commission  
671 Allentown Road  
Telford, PA 18969-2205  
Attn: Mr. Gerald R. DeLong,  
Chairman

Hatfield Township  
1950 School Road  
Hatfield PA 19440-1992  
Attn: Mr. Andrew S. Haines,  
Township Manager

Hatfield Township  
Board of Commissioners  
1950 School Road  
Hatfield PA 19440-1992  
Attn: Mr. Scott Brown, President

Hatfield Township  
Planning Commission  
1950 School Road  
Hatfield PA 19440-1992  
Attn: Mr. George Zisk, Chair

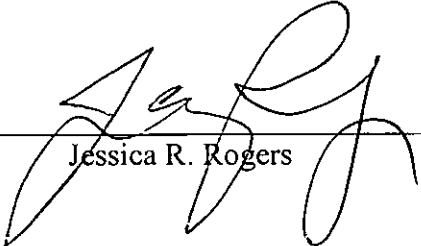
Robert & Linda Roth  
1578 Heebners Way  
Lansdale, PA 19446

Coatings for Industry  
319 Township Line Rd  
Souderton, PA 18964

PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19103

TH Properties LP  
345 Main Street  
Harleysville, PA 19438

Date: April 29, 2011



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Jessica R. Rogers