

140th anniversary
Nauman Smith
Attorneys At Law

Please Reply to:
P. O. Box 840
Harrisburg, PA 17108-0840

J. Stephen Feinour, Esquire
E-mail: sfeinour@nssh.com
Telephone Extension: 156

May 2, 2011

**Via Electronic Mail
Confirmed Via U.S. Mail**

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

**RE: Application of PPL Electric Utilities Corporation filed pursuant to 52 Pa. Code Chapter 57, Subchapter G, for approval for the siting and reconstruction of the Brunner Island – West Shore 230 kV transmission line in Cumberland and York Counties, Pennsylvania.
Docket No. A-2011-2230053**

Dear Secretary Chiavetta:

I am enclosing the original of a Petition to Intervene for filing on behalf of Upper Allen Township in connection with the above-referenced matter. As evidenced by the attached Certificate of Service, the Petition to Intervene is being served on all active parties of record. A hard copy of the Petition to Intervene will be delivered to your office as required. If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely yours,


Jeannette Chelgren, Secretary
to J. Stephen Feinour, Esquire

Enclosures

cc: All Parties of Record (w/enc.)
Upper Allen Township (w/enc.)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities Corporation:

filed pursuant to 52 Pa. Code Chapter 57,	:	
Subchapter G, for approval for the siting and	:	Docket No. A-2011-2230053
reconstruction of the Brunner Island – West	:	
Shore 230 kV transmission line in Cumberland	:	Filed Electronically
and York Counties, Pennsylvania.	:	

PETITION OF UPPER ALLEN TOWNSHIP TO INTERVENE

Pursuant to 52 Pa. Code §§ 5.75 and 57.75(d), and the First Prehearing Order in this matter dated March 17, 2011, Petitioner Upper Allen Township (hereinafter “Upper Allen”), by its Solicitor, J. Stephen Feinour, Esquire and Nauman, Smith, Shissler & Hall, LLP, 200 North Third Street, 18th Floor, P. O. Box 840, Harrisburg, PA 17108-0840, hereby petitions the Pennsylvania Public Utility Commission for permission to intervene in the above-captioned action as an interested party.

1. Petitioner, Upper Allen Township, is a first class township organized under the laws of the Commonwealth of Pennsylvania with offices at 100 Gettysburg Pike, Mechanicsburg, PA 17055.

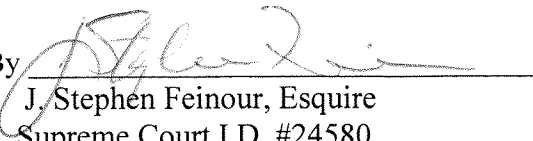
2. The existing right-of-way for the single-circuit Brunner Island - West Shore 230 kV transmission line crosses three of the municipal parks of Upper Allen Township: Winding Hills Park East, Winding Hills Park West and Fisher Park (“Community P”ark), among other properties in the Township.

3. Should PPL Electric determine that it needs additional right-of-way in any of the aforesaid municipal parks, such additional right-of-way will likely affect existing improvements and recreational facilities in the parks.

4. Upper Allen Township seeks to intervene in this proceeding in order to preserve its objection to any widening of the existing PPL Electric right-of-way in any of the Township municipal parks to the extent that such additional right-of-way affects existing improvements and recreational facilities in said parks.

WHEREFORE, Petitioner, Upper Allen Township, requests the Pennsylvania Public Utility Commission to grant it permission to intervene in the within action as an interested party.

NAUMAN, SMITH, SHISSLER & HALL, LLP

By 
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Attorneys for Upper Allen Township

Date: May 2, 2011

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities Corporation:

filed pursuant to 52 Pa. Code Chapter 57,	:	
Subchapter G, for approval for the siting and	:	Docket No. A-2011-2230053
reconstruction of the Brunner Island – West	:	
Shore 230 kV transmission line in Cumberland	:	Filed Electronically
and York Counties, Pennsylvania.	:	

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing Petition to Intervene on behalf of Upper Allen Township, in the above action, this day by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania, addressed to:

The Honorable Susan D. Colwell
Administrative Law Judge
PA Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

John H. Isom, Esquire
Post & Schell, PC
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

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1600 JFK Boulevard
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Office of General Counsel
Two North Ninth Street
Allentown, PA 18106

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Whitney & Bogris, LLP
401 Washington Ave., 12th Floor
Towson, MD 21204

Thomas E. Martin, Jr., Esquire
201 South Board Street
P. O. Box 392
Kennett Square, PA 19348-0392

Irwin S. Popowsky, Esquire
Office of Consumer Advocate
5th Floor Forum Place
555 Walnut Street
Harrisburg, PA 17101-1923

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Office of Small Business Advocate
1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101

Johnnie Simms, Esquire
PA Public Utility Commission
Office of Trial Staff
P. O. Box 3265
Harrisburg, PA 17105-3265

Douglas C. McLearen, Chief
PA Historical & Museum Commission
State Historic Preservation Office
300 North Street
Harrisburg, PA 17120

Secretary's Office of Policy
PA Dept. of Environmental Protection
P. O. Box 2063
Harrisburg, PA 17105-8767

PA Department of Transportation
Attn: Allen D. Beihler, P.E.
Commonwealth Keystone Building
400 North Street, 8th Floor
Harrisburg, PA 17120

Gary Eichelberger, Chairperson
Cumberland County Commissioners
One Courthouse Square
Carlisle, PA 17013

Kirk Stoner, AICP, Director
Cumberland County Planning Commission
18 North Hanover Street, 3rd Floor
Carlisle, PA 17013

Amanda Parrish, Chairperson
Upper Allen Township Planning Commission
100 Gettysburg Pike
Mechanicsburg, PA 17055

York County Board of Commissioners
Attn: Steve Chronister, President
28 East Market Street, Room 216
York, PA 17401

York County Planning Commission
Attn: Terry Dunlap, Chairman
28 East Market Street, Room 301
York, PA 17401

Lower Allen Township
Attn: John Titzel, President
Board of Supervisors
2233 Gettysburg Road
Camp Hill, PA 17011

Lower Allen Township Planning Commission
Attention: Brett McCreary, President
2233 Gettysburg Road
Camp Hill, PA 17011

Conewago Township Board of Supervisors
Attn: Robert Hahn, Chairman
490 Copenhaffer Road
York, PA 17404

Conewago Township Planning Commission
Attn: Daryl Hull, Chairman
490 Copenhaffer Road
York, PA 17404

East Manchester Township
Board of Supervisors
Attn: Steven Gross, Jr., Chairman
5080 North Sherman Street Ext.
Mount Wolf, PA 17347

East Manchester Township
Planning Commission
Attn: Blaine Rentzel, Chairman
5080 North Sherman Street Ext.
Mount Wolf, PA 17347

Fairview Township Board of Supervisors
Attn: Perry Albert, Chairman
599 Lewisberry Road
New Cumberland, PA 17070

Fairview Township Planning Commission
Attn: Michael Powers, Chairman
599 Lewisberry Road
New Cumberland, PA 17070

Newberry Township Board of Supervisors
Attn: Stephen Pancoe, Chairman
1915 Old Trail Road
Etters, PA 17319

Newberry Township Planning Commission
Attn: Stephen Rehner, Chairman
1915 Old Trail Road
Etters, PA 17319

Metropolitan Edison Company
Attn: Donald Brennan, President
2800 Pottsville Pike
P. O. Box 16001
Reading, PA 19612, 6001

Date: May 2, 2011

A handwritten signature in cursive script, reading "Jeannette Chelgren", written in dark ink.

Jeannette Chelgren, Secretary to
J. Stephen Feinour, Esquire and
Benjamin C. Dunlap, Jr., Esquire