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File #: 02507/140066

May 3, 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

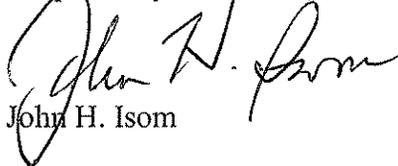
**RE: Application of PPL Electric Utilities Corporation Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, For Approval Of The Siting And Reconstruction Of The Brunner Island - West Shore 230 kV Transmission Line In Cumberland And York Counties, Pennsylvania - Docket No. A-2011-2230053**

Dear Secretary Chiavetta:

Enclosed is the Prehearing Memorandum of PPL Electric Utilities Corporation for the above-referenced proceeding.

Copies have been provided as indicated in the certificate of service.

Respectfully Submitted,



John H. Isom

JHI/jl

Enclosures

cc: Honorable Susan D. Colwell  
Certificate of Service

**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 FIRST CLASS MAIL**

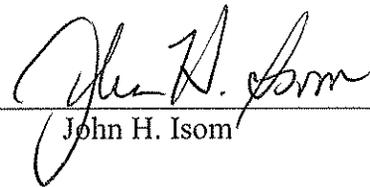
J. Stephen Feinour, Esquire  
Nauman, Smith, Shissler & Hall, LLP  
PO Box 840  
Harrisburg, PA 17108-0840

Gerald S. Gaetano, Esquire  
Whitney & Bogris, LLP  
401 Washington Avenue, 12<sup>th</sup> Floor  
Towson, MD 21204

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

Gregory J. Myers  
110 Miller Road  
York Haven, PA 17370

Date: May 3, 2011

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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: Application Of PPL Electric Utilities :  
Corporation Filed Pursuant To 52 Pa. Code Chapter : Docket No. A-2011-2230053  
57, Subchapter G, For Approval Of The Siting And :  
Reconstruction Of The Brunner Island-West Shore :  
230 kV Transmission Line In Cumberland And :  
York Counties, Pennsylvania :

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

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**TO ADMINISTRATIVE LAW JUDGE SUSAN D. COLWELL:**

Pursuant to 52 Pa. Code § 5.224(c), PPL Electric Utilities Corporation (“PPL Electric”) hereby submits this Prehearing Conference Memorandum.

**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  
jisom@postschell.com

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. This proceeding was initiated on March 9, 2011, when PPL Electric filed and served the “Application Of PPL Electric Utilities Corporation Filed Pursuant To 52 Pa. Code

Chapter 57, Subchapter G, For Approval Of The Siting And Reconstruction Of The Brunner Island-West Shore 230 kV Transmission Line In Cumberland And York Counties, Pennsylvania,” which was docketed at Docket No. A-2011-2230053 (“Application”).

3. PPL Electric was served on February 25, 2011, with a Formal Complaint filed by Gregory Myers at Docket No. C-2011-222771. The Complaint relates primarily to PPL Electric’s vegetation management plan, but it does contain allegations regarding the proposed reconstruction of the Brunner Island-West Shore 230 kV Transmission Line. The Complaint is in the mediation process.

4. On March 17, 2011, Notice of an Initial Prehearing Conference was issued. The Initial Prehearing Conference is scheduled for Monday, May 9, 2011, at 10:00 a.m. before the Honorable Susan D. Colwell (the “ALJ”).

5. On March 17, 2011, the ALJ issued the First Prehearing Order explaining party status and requesting that interested persons attend the Initial Prehearing Conference, and explaining that protests or petitions to intervene must be filed on or before May 2, 2011.

6. On March 24, 2011, a Notice of Intervention and Notice of Appearance was filed by Thomas E. Martin, Jr., Esquire on behalf of Barbara K. Martin Helen E. Martin and himself (hereinafter, collectively the “Martins”).

7. On April 29, 2011, a Notice of Intervention and Notice of Appearance was filed by Gerald S. Gaetano, Esquire on behalf of Gregory E. Black and Christy A. Black.

8. On May 2, 2011, a Notice of Intervention was filed by J. Stephen Feinour on behalf of the Upper Allen Township.

9. On March 26, 2011, notice of the Application was published in the Pennsylvania Bulletin, 41 Pa. B. 1742.

10. On March 29 and April 27, 2011, PPL Electric filed proofs of publication of the public notices of the above-referenced proceeding as published on March 18, 2011 and March 25, 2011 in The Harrisburg Patriot News, York Daily Record and The Carlisle Sentinel.

11. On April 8, 2011, PPL Electric served the following Direct Testimony:<sup>1</sup>

- a. PPL Electric St. No. 1 – Justin B. Wehr;
- b. PPL Electric St. No. 2 – Gopi R. Kedia;
- c. PPL Electric St. No. 3 – Peter Sparhawk;
- d. PPL Electric St. No. 4 – Danny S. Jarrah; and
- e. PPL Electric St. No. 5 – Debra S. Grierson;

### **III. ISSUES.**

12. PPL Electric intends to demonstrate that the proposed reconstruction of the approximately 16-mile, existing Brunner Island-West Shore 230 kV Transmission Line from a single-circuit 230 kV transmission line to a double-circuit 230 kV transmission line is reasonably necessary in order to resolve identified violations of mandatory reliability standards established by the North American Electric Reliability Corporation and to ensure reliable long-term service to customers in Cumberland and York Counties, as well as the bulk electrical system in the Mid-Atlantic region.

13. PPL Electric intends to demonstrate that the proposed route for the project was selected after extensive and detailed analysis, which included a comprehensive environmental inventory, identification and analysis of alternative routes, and selection of the preferred route. PPL Electric identified and compared route alternatives based upon a detailed analysis of societal

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<sup>1</sup> On May 3, 2011, PPL Electric served the Direct Testimony on the Blacks and the Upper Allen Township.

concerns, environmental impacts, engineering considerations and cost. PPL Electric intends to demonstrate that the preferred route was selected over the alternative routes because it makes the best use of existing transmission lines corridors, and existing rights-of-way which will minimize environmental impacts, social impacts and cost.

14. On these bases, PPL Electric intends to ask that the ALJ and the Commission approve the siting and reconstruction of the Brunner Island-West Shore 230 kV Transmission Line.

**IV. WITNESSES.**

15. PPL Electric intends to present the following statements, in its case-in-chief, in support of the above-captioned Applications:

<u>Witness</u>	<u>Issues</u>
1. Justin B. Wehr Siting Coordinator PPL Electric Utilities Corporation Two North Ninth Street Allentown, PA 18101	- Provide an overview of the project; - Describe the process employed by PPL Electric in developing, preparing, and filing the Application; - Provide an overview of the siting process; - Explain PPL Electric's use of outside consultants; - Explain the decision making process for selecting transmission line routes; and - Describe and summarize the benefits of the project.
2. Gopi R. Kedia Principal Engineer PPL Electric Utilities Corporation Two North Ninth Street Allentown, PA 18101	- Address the need for the project; - Describe the PJM, Interconnection, LLC regional transmission planning process that established the need for the project; - Describe PPL Electric's system planning process; - Explain that the proposed system will solve identified problems; and - Explain the benefits of the project.

3. Peter Sparhawk  
Project Director  
The Louis Berger Group, Inc.  
350 Eagleview Boulevard, Suite 250  
Exton, PA 19341

- Explain the selection of the route for the project.

4. Danny S. Jarrah  
Supervising Engineer  
PPL Electric Utilities Corporation  
Two North Ninth Street,  
Allentown, PA 18101

- Explain the design features of the project;  
- Describe the safety features that will be incorporated into the design of the proposed double-circuit Brunner Island-West Shore 230 kV Transmission Line.

5. Debra S. Grierson  
Senior Real Estate Specialist  
PPL Electric Utilities Corporation  
651 Delp Rd.  
Lancaster, PA 17601.

- Explain the status of the rights-of-way along the route proposed for the double-circuit Brunner Island-West Shore 230 kV Transmission Line; and  
- Explaining the notices sent to the owners of land within or adjacent to the proposed route.

PPL Electric has served copies of these statements on the interveners.

16. PPL Electric reserves the right to call additional witnesses to address any issues that may arise during the course of the proceeding.

## V. DISCOVERY

17. To date, PPL Electric has not received any requests for discovery in this matter. PPL Electric does not believe that any change or modification in the standard timelines for discovery set forth in the Commission's regulations is necessary or appropriate.

## VI. SETTLEMENT

18. On April 19, 2011, PPL Electric and the Martins initiated discussions to address the concerns set forth in the Martins' Notice of Intervention. PPL Electric and the Martins have reached an agreement in principle, and expect to execute a formal agreement in the near future.

19. On April 20, 2011, PPL Electric met with Gregory Myers to discuss his Formal Complaint filed at Docket No. C-2011-222771, which sets forth allegations regarding the proposed reconstruction of the Brunner Island-West Shore 230 kV Transmission Line. PPL Electric will continue to negotiate with Mr. Myers in an attempt to amicably resolve the concerns and allegations set forth in his Formal Complaint.

20. On May 3, 2011, PPL Electric and the Blacks initiated discussions to address the concerns set forth in the Blacks' Notice of Intervention. PPL Electric will continue to negotiate with the Blacks in an attempt to amicably resolve their concerns.

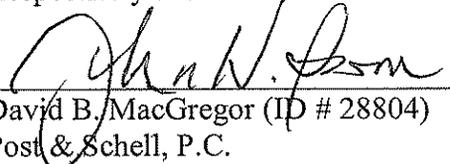
21. PPL Electric remains open to and available for settlement discussions and would support initiatives to begin settlement discussions at the earliest possible date.

Paul E. Russell (ID # 21643)  
Associate General Counsel  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18106  
Phone: 610-774-4254  
Fax: 215-587-1444  
E-mail: perussell@pplweb.com

Of Counsel:  
Post & Schell, P.C.

Date: May 3, 2011

Respectfully submitted,

  
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