

**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 : **Docket No. A-2011-_____**
THE RECONSTRUCTION OF A :
PORTION OF THE MARTINS CREEK – :
SIEGFRIED #2 230 KV TRANSMISSION :
LINE IN MOORE, LEHIGH AND ALLEN :
TOWNSHIPS IN NORTHAMPTON :
COUNTY, PENNSYLVANIA :

**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 a portion of the Martins Creek – Siegfried #2 230 kV Transmission Line. In support thereof, PPL Electric states the following:

I. OVERVIEW

1. PPL Electric proposes to rebuild a portion of the Martins Creek – Siegfried #2 230 kV Transmission Line (“Martins Creek – Siegfried #2 Line”). The portion of the Martins Creek – Siegfried #2 Line which PPL Electric proposes to rebuild is approximately 10.7 miles in length and begins at the Siegfried Substation located along West 27th Street in Allen Township and

extends to the last structure in Moore Township before the line turns east, located just south of State Game Land 168 and the Moore Township – Bushkill Township boundary.¹

2. The Martins Creek – Siegfried #2 Line was built and placed in service in 1926. The portion of the Line that will be rebuilt is now 85 years old and needs to be replaced because it has deteriorated substantially since it was initially placed in service.² The foundations, structure members, hardware, insulators, conductors and lightning protection all have been exposed to the elements and are not capable of continuing to provide dependable service into the future.

3. PPL Electric proposes to minimize the impact of rebuilding a portion of the Martins Creek – Siegfried #2 Line by using its existing route and right-of-way. The existing right-of-way is sufficient to accommodate the rebuilt Line and has already been cleared of vegetation that could interfere with the operation of a high voltage transmission line.

4. This Letter of Notification for rebuilding a portion of the Martins Creek – Siegfried #2 Line is the fifth such filing of PPL Electric under its Vintage Conductor Program. Under this Program, PPL Electric has identified old and 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.

5. Presently, the structures for the Martins Creek – Siegfried #2 Line are steel lattice towers. A detailed inspection of the structures has revealed that the concrete foundations and directly embedded steel foundations are in either poor or severe condition and need to be

¹ The eastern terminus of the line is located at the Martins Creek Power Generation Station.

² The entire length of the Line is 26.1 miles. The portion of the Line that PPL Electric does not propose to rebuild was reconstructed in the early 1970s.

replaced. Further, steel members on several of the lattice towers are bent and have been classified as being in “poor condition”.

6. The Martins Creek – Siegfried #2 Line has been part of PPL Electric’s backbone Bulk Electric System and has been relied upon in system planning for 85 years. It is still required by PPL Electric to provide adequate and reliable service to customers. Without the Martins Creek – Siegfried #2 Line, an outage of the Martins Creek – Siegfried #1 line and the subsequent outage of either the Susquehanna-Wescosville-Alburtis 500 kV line or the Siegfried – East Palmerton # 3 / Siegfried – Harwood 230 kV double-circuit line would result in 230 kV bus voltages at Siegfried substation dropping more than the five percent deviation allowed by PPL Electric’s planning guidelines. Therefore, abandoning the Line is not a reasonable option as it would compromise the integrity of the Bulk Electric System

7. PPL Electric analyzed whether it would be more appropriate to rehabilitate the Line or rebuild it. PPL Electric has determined that rebuilding the line will be more cost effective in the long run, as the line will have a longer life and will have substantially greater capacity. It is therefore clearly more prudent and a better technical solution to rebuild the Line.

8. The proposed Martins Creek – Siegfried #2 Line was reviewed with representatives of Moore, Allen and Lehigh Townships and Northampton County. Neither the Townships nor the County objects to the Project.

II. INTRODUCTION

9. The complete name of the Applicant is PPL Electric Utilities Corporation. Its principal address is:

Two North Ninth Street
Allentown, Pennsylvania 18101.

10. PPL Electric is a Pennsylvania corporation which supplies electric distribution, transmission, 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.

11. PPL Electric's attorneys are:

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

12. 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 Involved Property Owners.

13. This Letter of Notification and the Attachments listed above, which are incorporated herein by reference, provide all of the information required for a Letter of Notification under the Commission’s regulations at 52 Pa. Code § 57.72(d).

III. THE PROJECT

14. The portion of the Martins Creek – Siegfried #2 Line which PPL Electric proposes to rebuild is located in Moore, Lehigh and Allen Townships, in Northampton County. It is approximately 10.7 miles in length. The entire length of the line is 26.1 miles. The portion of the Line that PPL Electric is not proposing to rebuild was reconstructed in the early 1970s.

15. The portion of the Line that PPL Electric proposes to rebuild originates at the Siegfried Substation, in Allen Township, Northampton County. It continues in a generally northeasterly direction to the last structure in Moore Township before the line turns east, just south of State Game Land 168 and the Moore Township–Bushkill Township boundary.

16. The present Martins Creek – Siegfried #2 Line consists of a single circuit which is supported by steel lattice structures which average 90 feet in height. The average span length is approximately 1,100 feet.

17. The rebuilt Line will also consist of one circuit. It will be supported primarily by steel monopole structures with upswept steel arms.

18. Angle structures may consist of single, two- or three- pole structures, depending on the severity of the angle.

19. All poles will be installed on concrete foundations.

20. In total, the project will require the installation of approximately 52 structures. The average span length will be 1,100 feet; the structures will average about 120 feet in height.

21. 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. Such relocations may result in one or two additional structures. Present structures will be removed.

22. Pictures of the present structures and monopole structures proposed to be used to rebuild the Martins Creek – Siegfried #2 Line are provided in Figures 1 and 2, respectively, to Attachment 2, the Engineering Description.

23. There will be three 1,590 kcmil,³ 45/7 stranding ACSR⁴ power conductors for the Line.

24. Lightning protection will be provided by two shield wires consisting of a 0.752-inch diameter optical ground wire with 48 single mode fibers and a 0.5-inch extra high strength steel overhead ground wire.

³ The term “kcmil” stands for “thousand circular mils.” A circular mil is the cross-sectional area of a wire one mil in diameter, where 1 kcmil = 0.5067 mm².

⁴ ACSR stands for “aluminum conductor steel reinforced.”

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

26. The portion of the Martins Creek – Siegfried #2 Line that PPL Electric proposes to rebuild will be designed and constructed to comply with, and will generally surpass, the applicable minimum standards established in the National Electric Safety Code (“NESC”).

27. The estimated cost to rebuild the Line is \$17,137,000.

28. Subject to the Commission’s approval, construction of the project is scheduled to start in September 2012 to meet an in service date of November 2013.

IV. NECESSITY

29. The Martins Creek – Siegfried #2 230 kV Transmission Line is an integral part of the Bulk Electric System and is required to uphold the integrity of the 230 kV Bulk Electric System in the area. Without this line in-service, PPL Electric would not be in compliance with NERC Criteria as defined by the NERC Transmission Planning (TPL) Standards for the Bulk Electric System. The Line is also necessary for PPL Electric to continue to provide safe and reliable service to customers in the area.

30. The Martins Creek-Siegfried #2 230 kV line is one of two 230 kV circuits that connect the Martins Creek 230 kV switchyard and the Siegfried 230-138-69 kV Substation. The Martins Creek 230 kV switchyard serves as the outlet for the two generating units at Martins Creek Steam Electric Station and the three generating units at the Lower Mount Bethel Energy Plant. The two Martins Creek generating units each produce approximately 850 Megawatts (“MW”) of power. The Lower Mount Bethel generating units produce approximately 600 MW of power combined.

31. The Martins Creek-Siegfried #2 line is also one of seven 230 kV circuits that terminate into the Martins Creek switchyard and one of five 230 kV circuits that terminate into the Siegfried Substation. PPL Electric relies on the Martins Creek-Siegfried #2 230 kV line to uphold the integrity of the Bulk Electric System. Not rebuilding this circuit will leave the remaining 230 kV system in a vulnerable state, particularly under unplanned outage situations.

32. The North American Electric Reliability Corporation (“NERC”) requires that the Bulk Electric System remain stable and within applicable thermal and voltage limits under contingency conditions (e.g. unplanned outage) defined under Category C of the NERC TPL Standards. A Category C contingency is an event on the transmission system resulting in the loss of two or more elements. An element is a generator, single circuit transmission line, double circuit transmission line, bus section, breaker, or power transformer. An N-1-1 contingency is a specific Category C event where one element of the transmission system incurs an outage, followed by a period of system readjustment, and then a second element is unexpectedly interrupted.

33. Without the Martins Creek – Siegfried #2 Line, an outage of the Martins Creek – Siegfried #1 line and the subsequent outage of either the Susquehanna-Wescosville-Alburtis 500 kV line or the Siegfried – East Palmerton # 3 / Siegfried – Harwood 230 kV double-circuit line would result in 230 kV bus voltages at Siegfried substation dropping more than the five percent deviation allowed by PPL Electric’s planning guidelines. Therefore, abandoning the Line is not a reasonable option as it would compromise the integrity of the Bulk Electric System and cause PPL Electric to be in violation of NERC Transmission Planning Standards.

34. Taking the Siegfried Substation as an example, that Substation has five transformers. For a 2012 summer peak load scenario, using approximately 200 customers per

MW of load, the Substation supports electric service to approximately 125,000 customers. If the Martins Creek – Siegfried #2 230 kV line were not rebuilt, the reliable supply that these customers have come to expect would be compromised. In order to maintain reliable service to thousands of customers, the Martins Creek – Siegfried #2 230 kV Transmission Line must be maintained as part of the 230 kV system.

V. REHABILITATE V. REBUILD

35. Because it is necessary for the Martins Creek – Siegfried #2 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 10 of 52 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 or deformed 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 airborne pollutants. 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 the condition 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.

36. 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 while it would be slightly more expensive to rebuild the Line, the long-term benefits of rebuilding greatly outweighed the short-term cost savings of rehabilitating.

37. Rebuilding the Line would provide substantial benefits. First, the rebuilt Line would have a much longer expected useful life. A rehabilitated Line, in contrast, with many portions of the structures already 85 years old, could be expected to remain in service for only about 30 years. A rebuilt Line with modern structures, conductors and hardware can be expected to remain in service far longer.

38. Rebuilding the Line also will provide 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 Program and increase the Line's capacity by installing larger conductors.

VI. SITING ANALYSIS

39. PPL Electric did not conduct an alternative siting analysis for this project because PPL Electric determined that any alternative route outside the existing right-of-way would result in significantly greater impacts to both the social and natural environments and would increase project costs. Further, only a segment of the existing Martins Creek – Siegfried #2 230 kV

Transmission Line requires rebuilding at this time. Therefore, the endpoints to the portion of the Line to be rebuilt are established, which limits the availability of alternatives. The line replacement can be constructed entirely within the existing right-of-way and would not substantially alter the right-of-way. Therefore, the existing Martins Creek – Siegfried #2 230 kV right-of-way was determined to be the best route for rebuilding the transmission line.

40. All three townships crossed by the Line are rural townships. The project area has been historically dominated by farmland with scattered rural development and small villages. Moore, Allen and Lehigh Townships have experienced significant residential growth and corresponding loss of farmland. However, the existing land use remains predominantly a mix of agricultural and rural residential areas. The central and southern portions of the project area are primarily used for agriculture or low density rural residential development. Scattered development is located throughout the project area, which would make rerouting the Martins Creek – Siegfried project challenging. The density of residential land use in the project area further supports the decision to rebuild the Martins Creek – Siegfried within the existing right-of-way.

VII. IMPACTS ON NATURAL AND HUMAN ENVIRONMENTS

41. The rebuild of a portion of the Martins Creek - Siegfried #2 Line will have only minimal impacts on the natural and human environments.

42. The Lehigh Valley is home to many historic agricultural areas. These agricultural areas are located throughout the project area. The majority of the project area traversed by the Martins Creek – Siegfried Transmission Line, especially much of the northern portion, is designated by the Lehigh Valley Planning Commission (“LVPC”) as Farmland Preservation land. Two other agricultural designations are also found within the project area – Agricultural

Easements and Agricultural Security Areas. Eleven agricultural security areas, one in Allen Township and the remainder in Moore Township, are traversed by the Martins Creek – Siegfried #2 Line. In addition, four of the eleven agricultural security areas (one located in Allen Township and three located in Moore Township) are also subject to agricultural easements. Numerous additional agricultural easements, security areas, and land designated as Farmland Preservation by the LVPC are near the project area

43. Pursuant to 52 Pa. Code § 69.1101, PPL Electric reviewed the comprehensive plans and zoning ordinances applicable to the study area.

44. In general, zoning requirements within the townships that comprise the project area seek to preserve agricultural land and open space and concentrate growth in previously developed areas. Such preservation efforts would be negatively affected by a new transmission line right-of-way. Thus the decision to rebuild the Martins Creek – Siegfried Line within the existing right-of-way is consistent with local efforts to preserve agricultural land and open space.

45. Use of the existing right-of-way will not involve construction of utility facilities in new locations, will not require significant tree clearing and will not occupy new agricultural areas. Therefore, no significant impacts on agricultural lands are expected.

46. A desktop survey of historic architectural resources within the Martins Creek – Siegfried Project area was conducted. The survey consisted of accessing the Pennsylvania Historical and Museum Commission’s (“PHMC’s”) Bureau for Historic Preservation (“BHP”) Cultural Resources Geographic Information System (“CRGIS”) to review available information on previously recorded historic architectural sites along and in the vicinity of the transmission line.

47. The survey revealed that there are several previously-recorded historic architectural resources within one mile of the Martins Creek – Siegfried #2 Line. However, none of the NRHP-listed or eligible resources are found within the existing Martins Creek – Siegfried right-of-way. The NRHP-listed Lehigh Canal (Walnutport to Allentown Section) (key number 050956), located in multiple municipalities, and Cold Spring Bridge (key number 000125), located in Whitehall Township, are near the Siegfried Substation along the Lehigh River. One NRHP-eligible resource, referred to as “Water Company Dam” (key number 135639), in Whitehall Township and another eligible resource, referred to as “Hokendauqua Creek Crossing” (key number 136977), in Allen Township are also located within 1 mile of the Line. In addition, the NRHP-eligible Appalachian Trail, which traverses several municipalities, comes within 1 mile of the Line near the eastern terminus of the proposed rebuilt Line.

48. If consultation with the PHMC indicates that a historic architectural survey is required, it will be conducted within an area of potential effects (“APE”) that encompasses the transmission line and surrounding area for visual effects. During such a survey, historic architectural resources that have not been previously documented at the state level will be recorded. The height and design of the new transmission line towers will be used to determine the potential visual effect on these historic resources. If the transmission line results in an adverse effect on eligible or listed resources, measures will be developed and taken to mitigate the adverse effects of transmission line construction.

49. Effects on any historic architectural sites will be primarily visual resulting from the greater height of the new structures. Use of taller structures, however, is not expected to have a substantially greater impact on the right-of-way or nearby areas because the existing lattice towers are complex structures with numerous crossbars and members and greater width.

Further, rebuilding the Martins Creek – Siegfried #2 Line in place in an existing, cleared right-of-way will result in lesser visual impacts on any historic resources than a new line in an area where a line and cleared right-of-way do not already exist.

50. Review of the PHMC CRGIS reveals that only two recorded archaeological sites are within 1 mile of the proposed Martins Creek – Siegfried Transmission Line. One of these sites, 36NM0068, is located in Allen Township within the transmission corridor. The site is recorded as open prehistoric habitation. If feasible, it will be avoided when selecting tower/pole locations. The second site is also located within Allen Township approximately 0.15 miles from the right-of-way and recorded as open prehistoric habitation. Based on its distance from the right-of-way, no impact to the site is expected. The eligibility of both sites is undetermined due to insufficient data.

51. Proximity to water has been found to be the best predictor of prehistoric archaeological site locations. Pre-nineteenth century historic sites are generally located near streams. Therefore, areas within 150 meters (500 feet) of a stream, spring, or wetland are considered to have a high probability for prehistoric sites. Historic-period maps will be consulted to identify areas of high probability for later historic archaeological sites. Locations of above-ground historic resources also have a high probability for historic archaeological deposits.

52. If consultation with the PHMC indicates that a Phase I archaeological survey is required, it will be conducted within an APE encompassing all areas of anticipated ground disturbance from transmission line construction. Should potentially significant archaeological sites be identified, a Phase II survey will be conducted to determine their eligibility for the National Register. If National Register-eligible sites are present within the APE and cannot be avoided, measures will be taken to mitigate the adverse effects of transmission line construction.

53. Rebuilding the Martins Creek – Siegfried #2 Line in place will have minimal impacts on historic and architectural resources. The potential to impact surrounding cultural resources would be higher if a new transmission line right-of-way were developed, thus the decision to rebuild the Martins Creek – Siegfried #2 Line within the existing right-of-way minimizes the potential effect on these resources.

54. Based on a review of the National Hydrology Dataset (“NHD”) and the results of the wetland delineation conducted along the right-of-way, in addition to the wetlands, the Martins Creek – Siegfried #2 Line intersects nineteen (19) streams as it travels from the Siegfried Substation in the south to northern Northampton County. Two of these streams (Indian Creek and Hokendauqua Creek) are named streams, and the rest are unnamed tributaries of named streams. Based on review of Pennsylvania Department of Environmental Protection (“PADEP”) Title 25 Chapter 93 classifications, all nineteen of these streams are classified as Cold Water Fishes (PADEP 2010a). Six (6) of the nineteen streams are also classified as High Quality Waters by PADEP. None of the streams are classified as Trout Stocked Fishes.

55. Based on review of the U.S. Fish and Wildlife Service’s (“USFWS”) National Wetland Inventory (“NWI”), the Martins Creek – Siegfried Line does not intersect any NWI wetland systems (USFWS 2010). Based on the wetland delineations described previously, the Martins Creek – Siegfried Line intersects 19 wetlands, excluding the stream crossings discussed above. The Martins Creek – Siegfried Line traverses approximately 4.8 acres of wetlands.

56. These wetland systems are located throughout the project area, but are more concentrated in the northern, forested portion of the route. Most of these wetlands are palustrine emergent wetland systems. Two of the wetlands are palustrine open water wetlands (i.e., ponds), and one wetland is classified as palustrine forested.

57. The NWI provides a general overview of the potential wetlands that may be located within an area. For federal and state permitting purposes, wetlands and waterways within the study area were delineated according to regulatory standards and surveyed. The locations of the delineated wetlands will be illustrated on development plans. PPL Electric will obtain all required permits and adhere to the terms and conditions of such permits.

58. A review of Federal Emergency Management Agency (FEMA 2010) floodplain data for the project area indicates that the Martins Creek – Siegfried Line intersects three 100-year floodplains. These areas are associated with the Indian Creek, Hokendauqua Creek and Bushkill Creek stream corridors. The rebuilt line will not result in any new floodplain crossings. PPL Electric will avoid placing structures in floodplains to the extent practical.

59. Use of the existing corridor for the Martins Creek - Siegfried #2 Line instead of another route will have the least impact on water resources because it will require the least vegetation clearing and will involve no new crossings of water resources.

60. The Nature Conservancy's *Lehigh-Northampton Natural Areas Inventory* ("NAI") 2005 Update identified two special concern sites in the vicinity of the project area and one Pennsylvania Audubon Important Bird Area ("IBA")(Nature Conservancy 2004). The first special concern site, the Bushkill Creek Watershed area, is located approximately 280 feet north of the northern terminus of the Martins Creek – Siegfried #2 230 kV Line Replacement project. The site consists of gently sloping forest land and includes an "Ephemeral Fluctuating Pools Natural Community." The site includes marsh and shrub swamp, fed by ground water seepage that supports a species of concern. According to the NAI, the site is impacted by silt runoff from adjacent farm fields.

61. The second special concern site, the Clearview Road Riverbank Site, is located approximately 0.5 miles south of the southern terminus of the Martins Creek – Siegfried #2 230 kV Line Replacement project along the Lehigh River. The site supports a shrub and a graminoid (i.e., grass) species of concern. According to the NAI, extensive suitable habitat for both species occurs along this stretch of river.

62. The northernmost 0.9 miles of the line is located within a portion of the Pennsylvania Audubon designated Hawk Mountain and Kittatinny Ridge IBA No. 51. The Kittatinny Ridge is a long mountain ridge that winds 185 miles through eastern and central Pennsylvania, to the Maryland line. According to Audubon Pennsylvania, the Ridge is a fall migration flyway used annually by tens of thousands of raptors and vultures and millions of songbirds, and has been designated by Audubon Pennsylvania as the largest of the state’s IBAs. The proposed project is not expected to impact any of the identified NAI areas. The transmission line will be rebuilt in the existing right-of-way, which is currently maintained in accordance with PPL Electric’s *Vegetation Management Plan*. Although Kittatinny Ridge is an important bird migration corridor, the proposed project is not expected to adversely impact migration because the project is within an existing right-of-way and limited tree clearing would occur. The proposed project would increase the height of the structures from 90 feet to 120 feet; however, the location of the proposed project at lower elevations below the ridgeline would limit any potential for interference with bird migration.

63. A review of the Pennsylvania Natural Diversity Inventory (“PNDI”) database was conducted for the project area (PNDI Number 21074). The Pennsylvania Fish and Boat Commission (“PFBC”), Pennsylvania Game Commission (“PGC”), and the Pennsylvania Department of Conservation and Natural Resources (“DCNR”) indicated that no impacts to fish,

mammal, or plant species are anticipated. The U.S. Fish and Wildlife Service (“USFWS”) noted the potential presence of the federally threatened bog turtle (*Glyptemys muhlenbergii*). This species prefers to live in shallow, spring-fed bogs, swamps, marshy meadows, and pastures with soft, muddy bottoms, and slow-flowing waters. A Phase I habitat survey will be conducted to assess potential habitat and additional Phase II presence/absence surveys will be conducted if needed by a USFWS qualified bog turtle surveyor.

64. The proposed project is unlikely to adversely affect the bog turtle, because it is anticipated that any potential bog turtle wetlands can be spanned. In addition, because the proposed project is using an existing right-of-way, there would be limited, if any, tree clearing, thereby avoiding secondary impacts to any bog turtle habitat. Overall, using the existing right-of-way limits the potential for impacts to rare species versus constructing a transmission line in a new right-of-way, because there is less tree clearing and no new wetland and stream crossings.

VIII. HEALTH AND SAFETY

65. The rebuild of the Martins Creek – Siegfried #2 Line will not cause any unreasonable risk to the health and safety of persons in its vicinity.

66. The Engineering Description of the proposed Martins Creek – Siegfried #2 Line is provided in Attachment 2 accompanying this Letter of Notification.

67. The proposed Martins Creek – Siegfried #2 Line will not create any unreasonable risk of danger to the public health or safety. The Martins Creek – Siegfried #2 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.

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

69. 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.

70. 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.

71. The proposed Martins Creek – Siegfried #2 Line was reviewed with representatives of Moore, Allen and Lehigh Townships and Northampton County. Neither the Townships nor the County objects to the Project.

IX. LETTER OF NOTIFICATION

72. 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 Martins Creek – Siegfried #2 Line qualifies for use of a Letter of Notification under 52 Pa. Code § 57.72(d)(1)(i) because the Martins Creek – Siegfried #2 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 and will be built to operate at the same voltage as the existing line. The rebuild of the Martins Creek – Siegfried #2 Line will not substantially alter PPL Electric's existing right-of-way for the following reasons:

a. The existing right-of-way is 100 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 expected to have a lesser effect on land use within the right-of-way than currently exists. 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 maximum width of the existing lattice towers is approximately 53 feet. In contrast, the maximum width of the future monopole structures and the upswept arms will be approximately 38 feet.

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 780 square feet. A modern monopole structure, in contrast, has a single foundation with a footprint of approximately 50 square feet.

X. PROCEDURE

73. 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).

74. 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 Martins Creek – Siegfried #2

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; and (c) an instruction that the interested parties should contact Secretary Rosemary Chiavetta at the Commission's Harrisburg address.

75. 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 Martins Creek – Siegfried #2 Line will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71, *et seq.*

XI. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve the reconstruction of a portion of the Martins Creek – Siegfried #2 Line in Moore, Lehigh, and Allen Townships, Northampton County, Pennsylvania, as explained above and in the Attachments hereto.

Respectfully submitted,

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