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Jessica R. Rogers

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File #: 2507/149396

October 24, 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: Re: Letter Of Notification Of PPL Electric Utilities Corporation, Filed Pursuant To  
52 Pa. Code Chapter 57 Subchapter G, With Respect To The East Tannersville #1  
and #2 138 kV Tap Line in Pocono Township, Monroe County, Pennsylvania;  
Docket No. A-2011-**

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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 exhibits and appendices which are contained in a separately-bound volume. Also enclosed is a CD containing copies of the exhibits and appendices.

As indicated on the enclosed 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 involved governmental agencies and municipalities. If there are any questions concerning this matter, please contact me at the addresses or telephone numbers provided above.

Respectfully Submitted,



Jessica R. Rogers

JRR/kmg

Enclosures

cc: 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 REGULAR MAIL  
RETURN RECEIPT REQUESTED**

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

Pennsylvania Department of Transportation  
Commonwealth Keystone Building  
400 North Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17120  
Attn: The Honorable Allen D. Beihler, P.E.,  
Secretary

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

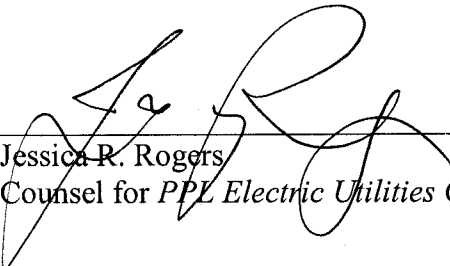
Monroe County Commissioners  
Monroe County Administration Center  
One Quaker Plaza Room 201  
Stroudsburg, PA 18360  
Attn: Suzanne McCool, Chairperson

Monroe County Planning Commission  
Monroe County Administrative Building  
One Quaker Plaza, Room 106  
Stroudsburg, PA 18360  
Attn: Ed Cramer, Chairman

Pocono Township Board of Supervisors  
PO Box 197  
Tannersville, PA 18372-0197  
Attn: Harold Werkheiser, Chairman

Pocono Township Planning Commission  
219 Oak Street  
East Tannersville, PA 18428  
Attn: Jane Cilurso, Chairwoman

DATED: October 24, 2011

  
\_\_\_\_\_  
Jessica R. Rogers  
Counsel for PPL Electric Utilities Corporation

**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, With : Docket No. A-2011-\_\_\_\_\_  
Respect To The East Tannersville #1 and :  
#2 138 kV Tap Line in Pocono Township, :  
Monroe County, Pennsylvania :

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**LETTER OF NOTIFICATION**

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TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), 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 East Tannersville #1 and #2 138 kV Tap Line (“East Tannersville Tap Line”) to supply a new substation in Pocono Township, Monroe County, Pennsylvania. The Tap Line will require approximately 750 feet of new 138 kV transmission line. 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:

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John H. Isom (Pa. Bar I.D. # 16569)  
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Voice: 610.774.4254  
Fax: 610.774.6726  
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 330 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 Field Management Program.
- Attachment 6 List of Involved Governmental Agencies, Municipalities, and Other Public Entities.

7. PPL Electric proposes to construct the East Tannersville Tap Line to improve reliability of service in Pocono Township, Monroe County. In conjunction with the proposed tap line, the Company intends to construct a 138-12 kV substation on property owned in fee by PPL Electric<sup>1</sup> and to add an additional 12 kV distribution line to reduce load on two other distribution lines in the area.<sup>2</sup>

8. The project will have few incremental land use impacts. The entire line will be located on property owned in fee by PPL Electric. The property is a wooded parcel the southern part of which is traversed by an existing double-circuit 138 kV Transmission Line. The visual

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<sup>1</sup> Contemporaneously with the filing of this Letter of Notification, PPL Electric is filing a Zoning Petition. Issues related to the Zoning Petition are interrelated with issues in this Letter of Notification.

<sup>2</sup> PPL Electric does not seek Commission approval to construct the 12 kV distribution line, because the Commission's regulations at 52 Pa. Code § 57.71 to § 57.77 require approval only for transmission lines with a design voltage greater than 100 kV. 52 Pa. Code. §§ 57.1, 57.71.

impacts of the project will be minimal, due to the dense vegetation and the adjacent transmission facilities.

9. The estimated cost to design and construct the tap is \$654,000. The total cost of the project, including the construction of the substation and the distribution line, is estimated to be \$1.1 million. Construction is scheduled to begin in spring of 2013 to meet an in-service date of November 2013.

## **II. PROJECT**

10. The proposed East Tannersville Tap Line will be located in Pocono Township, Monroe County. An aerial plot plan is provided at the end of Attachment 2 of this Letter of Notification. The plot plan depicts the location of the existing and proposed facilities.

11. The proposed East Tannersville Tap will extend approximately 750 feet from the existing Monroe-Jackson 138 kV Transmission Line to the new East Tannersville 138-12 kV Substation. The purposes of the proposed construction are to improve reliability of service in Pocono Township and to bring PPL Electric's 12 kV distribution system in that area into compliance with PPL Electric's Reliability Principles and Practices ("RP&P").

12. 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 has adopted its RP&P. 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.

13. The East Tannersville Tap Line will resolve two violations of the RP&P. First, load on the Tannersville 57-2 distribution line is projected to exceed the normal planning guidelines. The existing Tannersville 57-2 12 kV conductor is allowed to carry a maximum peak

load of 10.0 megavolt Ampere (“mVA”) under the RP&P. The winter 2013 peak load on this line is projected to be 11.1 mVA. Overloading the Tannersville 57-2 12 kV line could result in conductor damage or failure, which would interrupt service to approximately 1,600 customers until repairs could be made. This line cannot accommodate future load growth in the area.

14. Second, the existing Tannersville 57-2 distribution line exceeds PPL Electric’s RP&P guidelines for customer count per feeder. The RP&P guideline limits a 12 kV circuit to 1,300 customers. The Tannersville 57-2 circuit currently serves approximately 1,600 customers. The proposed East Tannersville Tap Line will supply the new 138-12 kV Substation. With the new substation, PPL Electric will be able to construct an additional 12 kV distribution line to serve the area. Customers can then be transferred from the 57-2 distribution line to the new distribution line, so that both lines will comply with the RP&P customer count requirement.

15. In addition to conforming to its RP&P guidelines, PPL Electric must undertake this project to improve the reliability of service in Pocono Township. The Tannersville 57-2 and Bartonsville 79-2 lines have both been among the worst performing circuits on the PPL Electric system, due to large numbers of customers experiencing multiple outages per year. These outages are caused by the wooded nature of the area and the high number of customers per distribution circuit. The existing system configuration allows for only limited transfer capability to adjoining substations during scheduled maintenance and outages. As a result, in such an event, customers remain without service until repairs are made.

16. Figures 1 and 2 to Attachment 1 of this Letter of Notification show one-line diagrams of the existing system.

17. PPL Electric proposes to construct the East Tannersville Tap Line in order to relieve overloading, and increase reliability and operating flexibility in Pocono Township. After

the Commission's approval of the new Tap Line, PPL Electric will construct the East Tannersville 138-12 kV Substation, which will be supplied by the Tap Line. One new 12 kV distribution line will be installed from the Substation to serve customers in the area.

18. The new 12 kV distribution line will serve part of the load currently being supplied by the Tannersville 57-2 distribution line. This reinforcement project will reduce peak loading on the Tannersville 57-2 distribution line by 3.3 MVA. The reduced load on the Tannersville 57-2 line will allow customers to be transferred between the Bartonsville 79-2 line and the Tannersville 57-2 line during outages. This increase in operational flexibility will improve reliability on both the Bartonsville 79-2 line and Tannersville 57-2 line.

19. The new facilities will also resolve the customer count violations on the existing Tannersville 57-2 distribution line. Once this project is implemented, the Tannersville 57-2 line will serve 950 customers, which brings the customer count to within the PPL Electric RP&P guideline of 1,300.

20. The new East Tannersville Substation will serve approximately 650 customers and 3.3 MVA of load. These customers and load will be transferred from the currently overloaded Tannersville 57-2 line.

21. Figure 3 to Attachment 1 depicts a functional one-line diagram of the proposed 138 kV facilities in the area. Figure 4 to Attachment 1 provides a functional one-line diagram of the proposed 12 kV distribution facilities in the area.

22. PPL Electric considered an alternative to the proposed project which would not require the Company to build a new tap line and substation. In the alternative, a new 12kV distribution line would be built from the existing Tannersville Substation. This alternative would require the new 12 kV distribution line to follow the same line route as the Tannersville 57-2 for

about 2 miles. This alternative would require expensive construction and would not improve reliability, because two distribution circuits installed on the same poles are susceptible to the same outages and could result in both lines experiencing an outage at the same time. Upgrades to the Tannersville Substation would also be necessary to accommodate the additional line.

23. The estimated cost for the alternative considered is \$ 1 million, which is only slightly less than the total cost of the proposed project, and the alternative does not accomplish the same improvement in reliability. In addition, a new substation would still be needed in the near future, and would result in abandonment of the new line. PPL Electric rejected this alternative because the preferred alternative, as proposed in this Letter of Notification, is a better long-term plan for the area and avoids an investment in facilities that would be useful only temporarily.

24. The East Tannersville Tap Line will require the construction of approximately 750 feet of new 138 kV line. The line will be designed for double circuit operation; however, it will initially be constructed and operated as a single circuit line until load growth in the area makes it appropriate to add a second circuit.

25. The East Tannersville Tap Line will consist of two poles and two spans of conductor. Each span will vary in length, with the shorter span being approximately 100 feet and the longer span being approximately 650 feet. The tap structure will be approximately 105 feet in height and will be installed on a concrete foundation. The remaining pole, excluding the poles for the Load Sectionalizing Air Break (“LSAB”) switches, will be approximately 80 feet in height and will be installed on a concrete foundation. In addition to the poles required for the tap to the East Tannersville Substation, two switch poles will be installed on the Monroe – Jackson #1 & #2 138 kV Line east of the proposed tap.

26. The Tap Line will consist of three power conductors and one overhead optical ground wire (“OPGW”). The power conductors will be 556.5 kcmil<sup>3</sup> 24/7 strand ACSR<sup>4</sup>. A 48 fiber 5/8 inch aluminum/aluminum clad steel OPGW will provide lightning protection for the proposed tap line.

27. When load growth in the area makes it appropriate to install the second tap line, an additional three power conductors and a 55 foot high tap pole will be added. The additional power conductors will also be 556.5 kcmil 24/7 strand ACSR. Another 48 fiber 5/8 inch aluminum/aluminum clad steel OPGW will provide lightning protection for the proposed tap line.

28. The East Tannersville Tap Line will be designed to comply with, and will generally surpass, the applicable minimum standards in the National Electrical Safety Code (“NESC”).

29. The total estimated cost to design and construct the proposed project is approximately \$654,000.

30. Construction of the proposed project is scheduled to begin in Spring of 2013 to meet an in-service date of November 2013.

31. The proposed East Tannersville Tap Line will be constructed entirely on property owned in fee by PPL Electric. No additional right-of-way is required.

32. Because the proposed East Tannersville Tap Line will require only 750 feet of new 138 kV transmission line and will be installed entirely upon property owned in fee by PPL Electric and in the vicinity of existing transmission facilities, as depicted in an aerial plot plan at

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<sup>3</sup> Kcmil wire size is the equivalent cross sectional area in thousands of circular mils. A circular mil is the area of a circle with a diameter of one thousandth (0.001) of an inch.

<sup>4</sup> ACSR stands for aluminum conductor steel reinforced.

the end of Attachment 2 to this Letter of Notification, it is anticipated that proposed construction will have minimal incremental impacts on the area.

33. Accompanying this Letter of Notification is a separately bound volume containing Attachments 1-6, which provide additional information about the proposed East Tannersville 138 kV Tap 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**

34. 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 construction of the East Tannersville Tap Line qualifies for use of a Letter of Notification because the East Tannersville Tap Line will require the siting and construction of a new high voltage transmission line that will be less than two miles in length.

35. The Necessity Statement for the proposed construction of the East Tannersville Tap Line is provided as Attachment 1 accompanying this Letter of Notification. As explained therein, the purpose of the proposed East Tannersville Tap Line is to improve reliability of service and operating flexibility in Pocono Township, Monroe County.

36. The Engineering Description of the proposed East Tannersville Tap Line is provided in Attachment 2 accompanying this Letter of Notification.

37. The Environmental Assessment for the proposed East Tannersville Tap Line is provided in Attachment 3 accompanying this Letter of Notification.

38. The proposed East Tannersville Tap Line will be located entirely on property owned in fee by PPL Electric. No additional right-of-way is required.

39. No communication towers, pipelines, or other utilities will be affected by the proposed East Tannersville Tap Line. The Stroudsburg – Pocono Airport is located approximately 6.2 miles east of the project location, and Pegasus Air Park Airport is located approximately 7.8 miles southwest of the project location. It is not anticipated that the proposed Tap Line will be a hazard to flight operations at these two airports due to the distance from the facilities, the small size of the proposed project and the existing transmission facilities in the area. PPL Electric will contact the PennDOT Bureau of Aviation and the Federal Aviation Administration to ensure that the proposed East Tannersville Tap Line will not be a hazard to flight operations.

40. The proposed East Tannersville Tap Line was reviewed with the Pennsylvania Historical and Museum Commission (“PHMC”). The PHMC identified that, given the soil type, topographic setting, slope direction, and distance to water, there is a potential for archeological resources at the project site. PPL Electric engaged the services of Dr. Frank Vento of the Quaternary Research Institute to conduct a Phase I Archeological Survey of the subject property. The Phase I Survey identified no significant archeological artifacts at the subject property. The results of the investigation were submitted to PHMC for its review, along with a recommendation that no further investigation be conducted. On June 23, 2011 PHMC issued a letter concurring with the recommendations of the report and agreeing that no further archeological evaluation was required for this project.<sup>5</sup>

41. The proposed East Tannersville Tap Line will not affect any unique geological, scenic, or natural areas. The nearest natural area is the Tannersville Cranberry Bog, which is located approximately 200 feet south of the project site. The portion of the Bog closest to the project site is at the tail end of the bog. The larger, publicly-accessible area is located

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<sup>5</sup> The applicable File Number is ER 2011-0370-089-A.

approximately one half mile east of the project site on the opposite side of Laurel Lake Road. In addition, Pennsylvania State Game Lands Number 186 is located approximately 3.5 miles southwest of the project location. Worthington State Forest is located approximately 8.5 miles southeast of the project location. No incremental impacts to these natural features are anticipated due to the small size of the project, the distance from the project site, existing vegetative buffer, topography and existing development between the project and these areas.

42. Some tree clearing is required for the construction of the East Tannersville Tap Line. 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” while conducting these activities.

43. The East Tannersville Tap Line will cross a small wetland. Given the narrow width, the tap will span the wetland. Any required permits will be obtained from the Pennsylvania Department of Environmental Protection and the United States Army Corps of Engineers prior to construction. PPL Electric will comply with any conditions placed on the permits. PPL Electric will acquire any required soil erosion and sedimentation control permits and will comply with any conditions placed on those permits.

44. The proposed East Tannersville Tap Line will not imperil any endangered or threatened species. PPL Electric has coordinated with different state and federal agencies to obtain information regarding threatened and endangered species in close proximity to the project area. A review of the Pennsylvania Natural Diversity Inventory (“PNDI”) records indicated that there were potential impacts to threatened and endangered species and/or special concern species and resources.<sup>6</sup> Based on the results of the PNDI review, Mellon Biological Services conducted

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<sup>6</sup> The PNDI Search ID for this project is: 20100812257584.

an on-site review of the project site and determined that threatened and endangered species were not present at the project site. Results of the on-site review were summarized in a report and submitted to U.S. Fish and Wildlife for review and concurrence.

45. Attachment 4 accompanying this Letter of Notification explains PPL Electric's Design Criteria and Safety Practices. The proposed East Tannersville Tap Line will not create any unreasonable risk of danger to the public health or safety. The East Tannersville Tap 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.

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

47. 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).

48. The proposed East Tannersville Tap Line was reviewed with representatives of Pocono Township and Monroe County, and neither the Township nor the County has any objection.

49. 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 East Tannersville #1 and #2 138 kV Tap 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; and (c) an instruction that interested parties should contact Secretary Rosemary Chiavetta at the Commission's Harrisburg address.

50. 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 East Tannersville #1 and #2 138 kV Tap Line will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71, *et seq.*

#### **IV. RELATED PROCEEDING**

51. Contemporaneously with the filing of this Letter of Notification, PPL Electric is filing a Zoning Petition seeking a Commission finding that a building to shelter control equipment at the proposed East Tannersville Substation in Pocono Township, Monroe County, Pennsylvania is reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance ("Zoning Petition"). Issues related to the Zoning Petition are interrelated with issues in this Letter of Notification.

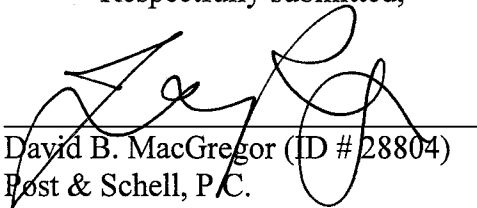
52. Pursuant to 52 Pa. Code § 57.75(i)(1), PPL Electric requests that these related proceedings be consolidated for hearings, if necessary, and decision.

V. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve the East Tannersville #1 and #2 138 kV Tap Line in Pocono Township, Monroe County, Pennsylvania, that is explained above and in the Attachments hereto.

Respectfully submitted,

Paul E. Russell (ID # 21643)  
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PPL Services Corporation  
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Of Counsel:

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E-mail: jisom@postschell.com  
E-mail: jrogers@postschell.com


Date: 10/24/11

*Attorneys for PPL Electric Utilities Corporation*

**VERIFICATION**

I, Gregory N. Dudkin, being the Senior Vice President – Operations of 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: 10/13/14

  
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