

Preliminary Objections for PUC hearings filed by Randall W. Clark (A-2011-2267352)

1. PPL has not proven the proposed 69 kV line to be necessary for proper service, accommodation, convenience or safety to residents on either side of the river.

- a. In rural settings such as these PPL, first and foremost, needs to "clean up" existing lines for proper uninterrupted service and safety to residents. This is not being done regularly as many residents have suggested at the informational meetings. Even under normal weather conditions, trees and branches touching the lines would have to excessively increase load exponentially. Overhanging branches and trees have made PPL's power lines unreliable, especially during bad weather. PPL's failure to maintain existing lines **does not** translate into a need for the new tie line which will be expensive and intrusive to communities and the rural environment. PPL would not share power line maintenance record information with us, but we can see the neglect for ourselves.
- b. After many years of neglect by PPL, power line brush and tree clean-up in our area was started hastily in the summer of 2010, only after many residents complained about the poor conditions of the existing rights of way at PPL's informational meetings. PPL would not comment about the clean-up.
- c. Residents have asked PPL for yearly outage information and causes of these outages, and they have not supplied the reports requested. At the special meeting at Hickory Corners Fire Hall PPL a representative finally admitted, in front of all attendees, that about **98%** of the outage problems on both sides of the river were maintenance, storm or accident related and not caused by the PPL stated 69kV transmission line deficiencies. PPL would not share the documents with us and are not being transparent with the citizens.
- d. Freedom of information was filed with the PUC on March 26, 2010, and the PUC has no records of excessive outages to confirm PPL's suggested "need" for the new 69 kV tie line.

We ask for PPL's actual area maintenance right of way records for the past 10 years in the study area to verify need.

Proof is needed as to why this is one of PPL's worst performing areas.

2. Another PPL river crossing will increase the number of safety hazards to aircraft and humans.

- a. Black fly and mosquito spaying occurs frequently from aircraft along the shores of the Susquehanna River.
- b. Many aircraft use the river for visual guidance.
- c. Several years ago a single engine airplane flew into PPL's **unmarked** Susquehanna River crossing lines at Dalmatia exhibiting PPL's proven disregard concerning safety of citizens.

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3. PPL's proposed 69kV tie line would do considerable environmental damage unnecessarily.

- a. The proposed line creates another river crossing. The high point river crossing is a hazard to migrating birds and waterfowl on the Susquehanna River flyway and it is also a potential hazard to several local nesting pairs of Bald Eagles using these high areas for nesting and observation perches.
- b. The line crosses more rural farmland/open spaces, which counters Pennsylvania's very expensive efforts to protect open and natural areas.
- c. Not all current land uses are compatible with the proposed line as PPL would have you believe. The line would destroy or hinder several local businesses.
- d. The Susquehanna River System is one of the most endangered river systems in the United States.
- e. The Susquehanna River is also a scenic river. Adding yet another river crossing in the vastly rural and scenic area of Snyder, Juniata and Northumberland Counties will harm this beautiful and rural landscape.

We ask the Administrative law judge for a Public Input Hearing to gather other citizen's concerns for the entire project.

4. Existing underutilized 12 kV river crossing line at Dalmatia.

- a. Existing PPL 12kV river crossing line at Dalmatia is being underutilized as an existing river crossing. Why not upgrade this river crossing to 69kV as the #1 priority before building new or double the 12kV lines? This would save millions and eliminate the need to exercise eminent domain on 10 farms. We have asked PPL for the utilization information records without success. PPL would not share this information with us at any of their "informational" meetings.
- b. The existing nearby Dalmatia 69kV line and substation is in nearly new condition and is a readily available source to connect. This line and substation is about 1 mile from the existing 12 kV river crossing at Dalmatia. This 69 kV -12 kV Substation could and should be used as a starting point even if it is proven there is a new line needed to cross the river. This connection would shorten the route, save several million dollars and most importantly be less intrusive on our rural community and environment. PPL would not comment.
- c. There is an existing 69kV high point river crossing less than 10 miles downriver (Millersburg) which we believe connects the same two 69kV lines PPL is proposing to tie. Questions were asked about this line and PPL would not comment.
- d. What are the short and long range plans for this existing 12 kV Dalmatia river crossing line? PPL would not comment.

We ask for clear grid system maps of the area including the 12 kV lines on both sides of the river especially the 36-02 12kV line and the number of residents and names and addresses of who the individual 12kV lines serve so that we may verify PPL reports.

We also ask for information about any power line sources coming into the study area and also power leaving the study area, including where

the lines go, total distance they travel, the number and names of who they serve.

- 5. If there is a proven need for the tie line project the least expensive route with the least amount of environmental impact was not chosen by PPL or researched as one of the 3 options.**
- a. Option B was less expensive with less environmental impact because less land area is needed for the project. A PPL official told us at one of the meetings that it would take at least 2 years to get permits to put a pole on an island in the river. He said that was the major concern with that option. Questions were asked why he didn't start 2 years earlier to obtain permits, we received no answer.
 - b. PPL did not look at other options which could have been cheaper, shorter and therefore would have also had less all around impact than all three of their selected routes. PPL would not comment.
 - c. There is an existing 69 kV line and substation within 1 mile of Dalmatia which could and should be connected to for use on the West shore. This existing line and substation are relatively new and in good condition. This connection would eliminate several miles of new power line construction, possibly save millions, and save open land and the environmental impact in both communities. This line connects directly to the Sunbury-Dauphin 69kV line which is the same exact line PPL proposed to connect to in all 3 of their selected options and would be miles shorter. We have not seen research or explanation by PPL as to why this can't be done.
We ask PPL to obtain an independent third party evaluation of the entire 69kV tie line proposal.

- 6. Freedom of Information was filed with the PUC on March 26, 2010 for records of PPL outage reports in the study area.**
- a. The PUC could not confirm outages by PPL or when these outages occurred on either side of the river.
 - b. Our legislators have asked for the same information from PPL with similar results.
We ask for an independent 3rd party to verify the need and verify PPL records of these outages and line performances. Option costs need to be studied by an independent 3rd party to confirm or reject PPL records.

- 7. Property owners discovered for the first time in the PPL eminent domain notebook issued in 10/11 that there was another PPL option eliminating the need for the proposed 69kV tie line and another river crossing. The eminent domain manual talks about a double circuit line running from Selinsgrove to Richfield area. This was never discussed at any meetings with the public.**
- a. How was the estimated price tag of 22 million reached? Has there been a third party investigation confirming any of these figures and routes?
 - b. Wouldn't a double circuit on the existing Juniata-Richfield 69kV line be superior in both cost and impact? A double circuit on the existing Dalmatia-Dauphin 69kV line could also be completed if needed. This

would eliminate the need for another river crossing and avoid condemning and destroying open properties?

We ask for itemized figures for all these possible options so we may form a proper opinion.

8. PPL broke state laws several times in their zeal to overpower residents and property owners. Supervisors were contacted with no resolve and the continued trespass by surveyors shows true arrogance of citizens' rights by PPL supervisors and workers. A PPL representative admitted to trespass on several properties at the last community meeting held at Hickory Corners Fire Hall in front of many witnesses. A PPL representative also admitted that PPL did not act correctly in the process.
- a. Trespass on several properties.
 - b. Destruction of property.

We ask PPL for explanations pertaining to breaking state laws. We ask that PPL explain company policy, procedures, and guidelines as it pertains to citizen rights.

9a. This 30 acre plot, owned by Randall W. Clark, is at a certain location, overlooking the Susquehanna river. From this location, one can see no less than 5 counties and its scenic beauty cannot be put into words. The property was purchased with the intention of the possibility of development in my retirement years. Now, with PPL's proposed power line running diagonally across the property, the development possibility is destroyed. This property has a lot of value, but, with this proposed power line, its value will be almost null, as far as development is concerned.

- b. Lower Mahanoy township has no zoning laws for subdivisions so we are free to do what we want with our property, including dividing and selling our land into development. With a view of the Susquehanna River and six of Pennsylvania's counties building lots would be extremely valuable if offered for sale. People have asked to buy building lots over the years of my ownership.
- c. PPL has defiantly trespassed on our property and properties of others with no explanation and with full knowledge of direct supervisors. No apology was ever given showing true arrogance on the part of PPL. The lack of following procedures and state laws by PPL should not be tolerated by the PUC.

PPL is not being upfront and truthful with us or the PUC in their condemnation process concerning our farm and business, including facts of negotiations and land use which are written in their application with the PUC.

We ask PPL for explanations to us and the PUC for clarifications of the above stated items.

We ask for PPL to list dates and times of stated negotiations with us to compare records.

10. PPL is discriminating against rural landowners who chose to resist selling land to developers over the years in order to keep rural land open and aesthetic.

Summary: PPL has not been transparent in their entire process with the public and for that matter, with the PUC and therefore it is impossible to tell truth from fiction. As far as we are aware there have been no third party evaluations of any of PPL's stated needs or plans. There are no itemized reports or figures that involve a third party for any of their options and price estimations. The PUC who is responsible for overseeing public utilities cannot confirm PPL outage/reliability problems in our area.

From an 'engineering standpoint' PPL has not proven that the proposed 69kV tie line is necessary for proper service, reliability and safety of citizens nor has PPL proven they used the lowest cost proposal with the least amount of impact. PPL has also been less than trustworthy or truthful in many actions throughout this process including discrepancies in many facets of the eminent domain application and we ask that the PUC reject the application of condemnation for my property and therefore also reject PPL's entire project on the above stated grounds.

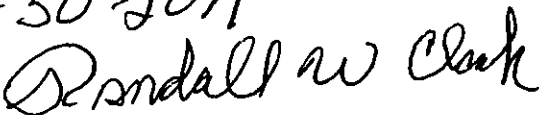
Verification

I,

Randall W. Clark

, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect 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: 11-30-2011

Signature: 

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Certificate of Service

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of & 1.54 (relating to service by a party)

All served via first class mail.

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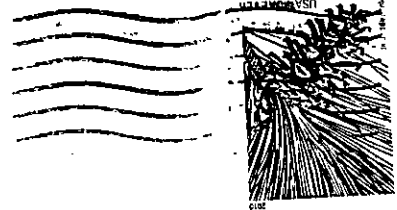
Dated this 30 day of November, 2011

Randall W. Clark

Signature

A handwritten signature in black ink that reads "Randall W. Clark". The signature is written in a cursive style and is positioned to the right of the printed name "Randall W. Clark".

RANDALL W CLARK
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