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File #: 2507/150135

December 19, 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 Reese – Hershey
138/69 kV Transmission Line in Derry Township, Dauphin County, Pennsylvania;
Docket No. A-2011-**

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 a copy of the Letter of Notification.

As indicated on the enclosed certificate of service, copies of the Letter of Notification 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
Robert F. Young
Paul T. Diskin
Nicholas Okoro
Kimberly

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**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 Reese – Hershey 138/69 :
kV Transmission Line in Derry Township, :
Dauphin County, Pennsylvania :

LETTER OF NOTIFICATION

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 construction of two short sections of new overhead 138/69 kV transmission line to connect the Reese Candy 138/69 kV Tap to the Hershey 69-12 kV Substation in Derry Township, Dauphin County, Pennsylvania. 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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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 375 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. Accompanying this Letter of Notification is a separately bound volume containing Attachments 1-7, which provide additional information about the proposed construction of the Reese – Hershey 138/69 kV Transmission Line:

- 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 Owners of Property within the Right-of-Way
- Attachment 7 List of Involved Governmental Agencies, Municipalities, and Other Public Entities.

7. 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).

8. This project is required to resolve violations of PPL Electric's Reliability Principles and Practices ("RP&P") guidelines, and improve the reliability of service and operating flexibility of PPL Electric's system in the Hershey area. In addition, the project will help meet the increasing demand for electrical power in the area.

9. The two new sections of overhead 138/69 kV transmission line proposed in this Letter of Notification will be approximately 360 feet and 70 feet in length. The remaining portion of the new 138/69 kV line, which is approximately 2.2 miles in length, will be constructed underground within existing public right-of-way and new private right-of-way. PPL Electric is only seeking Commission approval for the overheard portion of this line.

10. The total estimated cost of the proposed project is \$13 million, which includes both the overhead and underground portions. The overhead portions of the line will cost approximately \$700,000, and the underground portion will cost approximately \$12.3 million. Construction is scheduled to begin in March of 2012, to support the project's scheduled in-service date of May of 2013.

II. PROJECT SUMMARY

11. The proposed Reese – Hershey 138/69 kV Line will be located in Derry Township, Dauphin County. An aerial exhibit showing the location of the proposed facilities is provided at the end of Attachment 2 to the Letter of Notification. The plot plan depicts the location of the proposed construction route.

12. The proposed Reese – Hershey 138/69 kV Transmission Line will involve the construction of approximately 360 foot and 70 foot sections of overhead line. One section will be located at each end of the Transmission Line. The purpose of the proposed construction is to connect the Reese Candy 138/69 kV Tap to the Hershey 69-12 kV Substation in Derry Township, Dauphin County.

13. The Necessity Statement for the proposed construction of the Reese – Hershey 138/69 kV Transmission Line is provided as Attachment 1 accompanying this Letter of Notification. As explained therein, this Project is necessary to comply with the reliability requirements for PPL Electric's 69 kV transmission system, as found in PPL Electric's RP&P.

14. PPL Electric plans its system in accordance with the guidelines found in the RP&P, so that PPL Electric can sustain probable contingencies and disturbances with only minimal customer service interruptions, and so that it can adequately serve each customer's needs with regard to capacity, voltage and reliability for all load levels throughout the daily load cycle. System Planning is the process which assures that PPL Electric's regional system can supply electricity to all customer load in a manner that is reliable and economic. In addition, the system is planned so that system reliability can be maintained to prevent large scale, long term, or frequent service interruptions in order to avoid adverse effects and hazards to the public.

15. The planning process begins with the development of a computer model of the future system. A specific study year is chosen. The future system model is then developed using the existing system plus any planned modifications to the transmission system scheduled to be in service prior to the study year. Load levels used in the system model are based on the latest forecast prepared annually by PPL Electric, which is based on recent summer peak load forecasts that take into account ambient temperatures and humidity indices.

16. Once the system model is complete, comprehensive power flow simulations are performed to determine the ability of the system to comply with the PPL Electric transmission planning reliability criteria. All conditions where the system is not in conformance with the reliability criteria are identified, and system reinforcements are added to bring the system into conformance. Also identified are estimated costs and lead-times to implement the required reinforcements. Computer simulations of the system with the identified reinforcement alternatives are completed to identify the best overall reinforcement that will meet the needs of the region in a reliable and economic manner.

17. The RP&P guidelines require that, for an outage of a double circuit 69 kV transmission line, 120 MW of load can be interrupted for up to 2 hours, and after 2 hours only 45 MW of load can remain interrupted. All other load must be restored by field switching to adjacent transmission lines or substations. In addition, after 10 hours or until repairs are completed, whichever is earlier, all load must be restored.

18. There are two existing 69 kV transmission lines which terminate into the Hershey Substation; both are served from PPL Electric's Hummelstown 230-69 kV Substation. One of the transmission lines goes directly into the Hershey Substation. The other goes via PPL Electric's South Hershey 69-12 kV Substation before connecting to the Hershey Substation. These two 69 kV transmission lines provide electric power supplies to two 69-12 kV PPL Electric-owned distribution substations and one customer-owned substation. The lines are double circuited for 1.47 miles into the Hershey Substation. This portion of the line is an area of immediate concern, because an outage on this portion of the line could interrupt the entire Hershey Substation load of 52 MW.

19. Figure 1 to Attachment 1 of this Letter of Notification provides a one-line diagram of the existing transmission system configuration.

20. By the summer of 2012, if there was a double circuit line failure of the Hummelstown – Hershey and Hershey – South Hershey 69 kV lines due to a transmission line failure or a maintenance outage, approximately 52 MW of load would remain interrupted at the Hershey Substation after all of the field switching moves are completed to transfer load to the adjacent substations.¹ PPL Electric's RP&P permits up to 45 MW for a double circuit 69 kV line outage. A double circuit line outage of either the Hummelstown – Hershey or the Hershey –

¹ A line failure includes failure of cross arms, insulators, structures, or wires down, etc.

South Hershey 69 kV Line would cause excessive load drop beyond that which is permitted by the RP&P.

21. By the end of May 2012 this problem will transfer from the Hershey Substation side of the system to the Reese Substation side, because approximately 20 MW of load from Hershey Substation would be transferred to the customer-owned Reese Substation as a result of the relocation by The Hershey Company of some manufacturing equipment from their existing facility, which is served by the Hershey Substation, to a new facility which will be served by the Reese Substation. A double circuit outage of the 69 kV transmission line from the Hummelstown Substation, which supplies the PPL Electric-owned Duke Substation and the customer-owned Reese Substation, would interrupt approximately 57 MW of load. After restoration of 5 MW of load via transfers on the 12 kV system, load in excess of 45 MW would remain interrupted. This amount would exceed the permissible limit for a double circuit 69 kV line outage under the RP&P.

22. The proposed Project will allow PPL Electric to meet its RP&P guidelines, will provide the transmission facilities required for quick restoration of electric service to customers, and will resolve the load loss concerns associated with an outage of double circuits supplying the Duke and Reese Substations or a failure of the double circuits supplying the Hershey Substation. The proposed project involves the construction of a high capacity 138/69 kV transmission line between the customer owned Reese Substation and the PPL Electric owned Hershey Substation in order to alleviate excessive load drop conditions in the event of a failure of existing supply lines. The project will also provide capacity for future load growth and load transfer capability in case an outage occurs at either the Hershey or the Reese Substation. In addition, the proposed system will provide improved operating flexibility.

23. In order to construct the proposed line, PPL Electric requires new rights-of-way across three separate parcels, all of which are owned by a single property owner. PPL Electric is in the process of negotiating with the property owner to acquire the new land rights. PPL Electric has come to an agreement in principle with the property owner, but has yet to execute the agreement.

24. The section of new overhead line near the area of the existing Reese Substation, which is on the western end of the line, will connect to the existing Reese Candy #1 138/69 kV Tap. This line segment will require the installation of approximately 360 feet of new transmission line and two new structures.

25. One new structure will be a single-shaft steel transmission pole switch structure. *See Attachment 2, Figure 1.* The other new structure will be an overhead to underground transition structure. *See Attachment 2, Figure 2.* The new steel transmission pole will be approximately 70 feet in height and direct embedded. The new transition structure will be approximately 80 feet in height and will be installed on a concrete foundation. The line will consist of three power conductors and one overhead ground wire. The power conductors will be 556.5 kcmil², 24/7 stranding, ACSR³ power conductors. A 3/8 inch steel overhead ground wire will provide lightning protection for the proposed line.

26. The section of new overhead line near the area of the existing Reese Substation will be designed to accommodate an additional pole and conductors to allow for a future double tap installation. The second circuit will run from the Reese Candy #2 138/69 kV Tap to the additional pole. The second circuit will be used primarily for maintenance and contingency

² 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.

³ ACSR stands for aluminum conductor steel reinforced.

situations. The additional pole will be a single-shaft steel transmission pole switch structure, which will be similar to and installed adjacent to the switch structure mentioned in Paragraph 25. *Three additional power conductors will be installed when the switch structure is installed.* The additional facilities will be installed when justified by system requirements.

27. The section of new overhead line connecting to the existing Hershey Substation, which is the eastern section of the line, will consist of approximately 70 feet of new transmission line and one new overhead to underground transition structure. The new structure will be approximately 71 feet in height and will be installed on a concrete foundation. The line will consist of three power conductors and one overhead ground wire. The power conductors will be 556.5 kcmil, 24/7 stranding, ACSR power conductors. A 3/8 inch steel overhead ground wire will provide lightning protection for the proposed line.

28. Figure 2 to Attachment 1 of this Letter of Notification provides a one-line diagram of the proposed transmission system configuration.

29. The proposed construction of the Reese – Hershey 138/69 kV Transmission Line will be designed to comply with, and will generally surpass, the applicable minimum standards in the National Electrical Safety Code (“NESC”).

30. The total estimated cost to design and construct the proposed overhead portion of the Project is \$700,000.

31. The proposed construction has a scheduled in-service date of May 2013. In order to meet that date, construction is scheduled to begin by March of 2012.

32. In determining the proposed solution for this project, PPL Electric considered one other alternative. The other alternative would require construction of a transmission line that would be approximately 4 miles long. Approximately two miles of this line would be overhead

in a new right-of-way, and approximately two miles would be underground. This transmission line would connect the Hummelstown Substation to the Hershey Substation. This alternative is estimated to cost approximately \$17.2 million.

33. This alternative would add 2 miles of additional overhead transmission line to the proposed solution, which makes it more expensive and more difficult to construct, due to the additional rights-of-way that would be needed. In addition, it requires a new 69 kV line terminal at the Hummelstown Substation. The alternative would cost almost \$3 million more than the proposed project.

34. The Engineering Description of the proposed construction of the Reese – Hershey 138/69 kV Transmission Line is provided in Attachment 2 accompanying this Letter of Notification.

III. HEALTH AND SAFETY

35. The proposed construction of the Reese – Hershey 138/69 kV Transmission Line will not create any unreasonable risk of danger to the public health or safety. The proposed line sections 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.

36. Attachment 5 accompanying this Letter of Notification explains PPL Electric's standards for Magnetic Field Management. PPL Electric has determined, as a matter of policy, to design its new and rebuilt transmission lines to reduce magnetic fields when that can be done at low or no cost and consistent with functional requirements. PPL Electric's Magnetic Field Management Program has been developed to implement that policy decision. To reduce

magnetic field exposures, the program generally prescribes the use of a line design that provides for five feet higher ground clearance than NESC standards and reverse phasing of new double-circuit lines where it is feasible to do so at low or no cost.

37. Consistent with the program, PPL Electric will construct the new overhead line sections for five feet higher ground clearance than NESC standards, in order to reduce magnetic field exposures. Since the line will initially be designed for a single circuit, reverse phasing is not possible. Reverse phasing requires a double circuit line. In the future, when PPL Electric installs the second circuit on the Reese Candy portion of the line, the Company will implement reverse phasing if it is practical and economically feasible.

IV. RIGHT-OF-WAY STATUS

38. The proposed construction of the Reese – Hershey 138/69 kV Transmission Line will be located within new rights-of-way obtained by PPL Electric for the purposes of this Project. PPL Electric has reached a verbal agreement with the property owner regarding the rights-of-way.

39. Because the proposed Reese – Hershey 138/69 kV Transmission Line will be located in an industrial area in close proximity to other PPL Electric transmission facilities, it is anticipated that the proposed construction will have minimal incremental impacts on the area.

V. ENVIRONMENTAL EVALUATION

40. No communication towers, pipelines, or other utilities will be affected by the proposed construction of the Reese – Hershey 138/69 kV Transmission Line. Reigle Field Airport is the nearest airport, and is located approximately 3.5 miles to the east of the Project site. PPL Electric will contact the PennDOT Bureau of Aviation and the Federal Aviation Administration to ensure that the proposed construction will not be a hazard to flight operations.

41. The proposed construction of the Reese – Hershey 138/69 kV Transmission Line was reviewed with the Pennsylvania Historical and Museum Commission (“PHMC”).⁴ The PHMC determined that there are prehistoric and historic archaeological resources located near the project. In addition, the PHMC determined that there are properties near the project which are listed or eligible for the National Register of Historic Places. Correspondence from the PHMC, dated July 18, 2011, indicates that the proposed activities associated with construction of this Project should have no effect on the identified resources. No further investigations are required.

42. The proposed construction of the Reese – Hershey 138/69 kV Transmission Line will not affect any unique geological, scenic, or natural areas. The overhead line segments will be located in industrial areas. Tree clearing is not required for either segment. The line will not cross any wetlands or other aquatic resources. PPL Electric will acquire any required soil erosion and sedimentation control permits and comply with any conditions imposed by such permits.

43. PPL Electric has consulted with state and federal agencies to obtain information regarding endangered and threatened species in close proximity to the proposed construction of the Reese – Hershey 138/69 kV Transmission Line.⁵ A review of the Pennsylvania Natural Diversity Inventory (“PNDI”) records indicates that there is a potential impact under the jurisdiction of the United States Fish and Wildlife Service (“USFWS”). The USFWS reports that the project area is within the known range of the bog turtle (*clemmys muhlenbergii*).

44. PPL Electric retained Rick Mellon, of Mellon Biological Services, to address any USFWS concerns. Bog turtles are known inhabitants of certain types of wetlands. However,

⁴ File No. ER2011-1883-043-A.

⁵ The PNDI Search ID for this Project is 20101229276318.

Mellon Biological Services determined that there are no wetlands present within the project area. Correspondence from the USFWS, dated May 11, 2011, concluded that, based on the information supplied by Mr. Mellon, the proposed project will not affect the bog turtle. All conflicts with species of concern have been resolved with the appropriate agencies.

VI. NOTICE

45. The proposed construction of the Reese – Hershey 138/69 kV Transmission Line was reviewed with representatives of Derry Township and Dauphin County. The Township and the County have no objection.

46. Attachment 6 accompanying this Letter of Notification identifies the owner of the property which will be crossed by the proposed new rights-of-way. A copy of this Letter of Notification is being served on the property owner listed in Attachment 6 in accordance with 52 Pa. Code § 57.72(d)(3).

47. Attachment 7 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 7 in accordance with 52 Pa. Code § 57.72(d)(3).

48. 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 construction of the Reese – Hershey 138/69 kV Transmission Line. Such notice will contain: (a) the date this Letter of Notification was filed with the Commission; (b) a brief description of the proposed construction Project and its location; and (c) an instruction that interested parties should contact Secretary Rosemary Chiavetta, at the Commission's Harrisburg address.

VII. LETTER OF NOTIFICATION

49. 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 Reese – Hershey 138/69 kV Transmission Line qualifies for use of a Letter of Notification because the overhead portions of the Project are less than two miles in length.

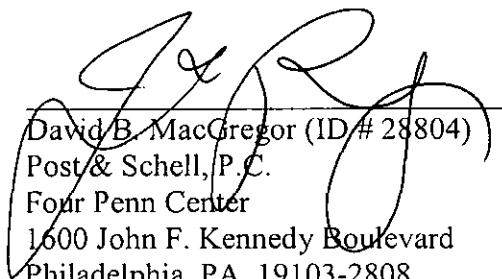
50. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the proposed construction of the Reese – Hershey 138/69 kV Transmission Line will be completed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71, *et seq.*

VIII. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve the proposed construction of the Reese – Hershey 138/69 kV Transmission Line in Derry Township, Dauphin County, Pennsylvania, that is explained above and in the Attachments hereto.

Respectfully submitted,

Paul E. Russell (ID # 21643)
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Date: December 19, 2011

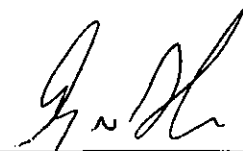
Attorneys for PPL Electric Utilities Corporation

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VERIFICATION

I, Gregory N. Dudkin, being the Senior Vice President of 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: 12/13/11



Gregory N. Dudkin

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Letter of Notification has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA CERTIFIED 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, 8th 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

Dauphin County Planning Commission
Dauphin County Veterans Memorial
Building
112 Market Street, 2nd Floor
Harrisburg, PA 17101
Attn: Thomas Clark, Chairperson

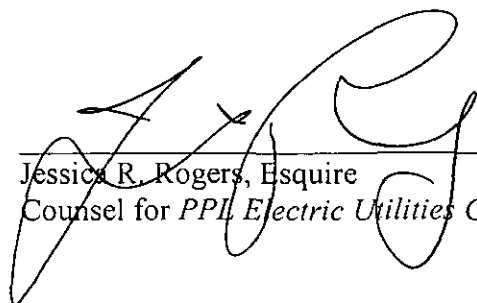
Dauphin County Board of Commissioners
P.O. Box 1295
Harrisburg, PA 17108
Attn: Jeffrey T. Haste, Chairperson

Derry Township Planning Commission
600 Clearwater Road
Hershey, PA 17033
Attn: Ned Wehler, Chairperson

Derry Township Board of Supervisors
600 Clearwater Road
Hershey, PA 17033
Attn: E. Christopher Abruzzo, Chairperson

The Hershey Company
100 Crystal A Drive
P.O. Box 810
Hershey, PA 17033-0810

Date: December 19, 2011



Jessica R. Rogers, Esquire
Counsel for PPL Electric Utilities Corporation

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