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File #: 140066

February 27, 2012

BY E-FILE

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: Petition of PPL Electric Utilities Corporation For A Finding That A Building To Shelter Control Equipment At The Fountain Hill 69 - 12 kV Substation To Be Constructed in Salisbury Township, Lehigh County, Pennsylvania Is Reasonably Necessary For The Convenience Or Welfare Of The Public
Docket No. P-2012-

Dear Secretary Chiavetta:

Enclosed, for filing, are an original and three (3) copies of the Petition of PPL Electric Utilities Corporation for the above-referenced proceeding. Copies have been provided to the governmental agencies and municipalities as indicated on the certificate of service.

Respectfully Submitted,

John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service
Kimberly Hafner
Office of Consumer Advocate
Office of Small Business Advocate
Bureau of Investigation & Enforcement

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Petition** 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 CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

PA Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
Attn: Mr. Douglas C. McLearn, Chief

Honorable Barry Schoch, P.E., Secretary
PA Department of Transportation
c/o Office of Chief Counsel
Commonwealth Keystone Building
400 North Street, 9th Floor
Harrisburg, PA 17120
Attn: Andrew Gordon

Department of Environmental Protection
Market Street State Office Building
PO Box 2063
Harrisburg, PA 17105
Attn: Office of Field Operations

Lehigh County Commissioners
17 S. Seventh Street
Allentown, PA 18101
Attn: Mr. Dean N. Browning, Chairman

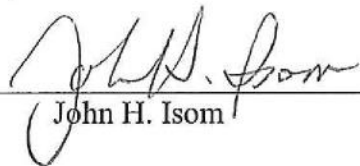
Lehigh Valley Planning Commission
961 Marcon Boulevard, Suite 310
Allentown, PA 18103
Attn: Steven L. Glickman, Chairman

Salisbury Township
Board of Commissioners
2900 South Pike Avenue
Allentown, PA 18103
Attn: James Brown, President

Salisbury Township Planning Board
2900 South Pike Avenue
Allentown, PA 18103
Attn: Charles Beck, Chairperson

County of Lehigh
17 S. Seventh Street
Allentown, PA 18101

Date: February 27, 2012



John H. Isom

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition Of PPL Electric Utilities :
Corporation For A Finding That A Building :
To Shelter Control Equipment At The :
Fountain Hill 69 - 12 kV Substation To Be : Docket No. P-2012-_____
Constructed In Salisbury Township, Lehigh :
County, Pennsylvania Is Reasonably :
Necessary For The Convenience Or Welfare :
Of The Public :

PETITION OF PPL ELECTRIC UTILITIES CORPORATION

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric”) hereby petitions the Pennsylvania Public Utility Commission (“Commission”), pursuant to 52 Pa. Code § 5.41 and 53 P.S. § 10619, for a finding that a building to shelter control equipment (“Control Equipment Building”) at the proposed Fountain Hill 69 – 12 kV Substation (“Fountain Hill Substation”) in Salisbury Township, Lehigh County, Pennsylvania is reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance (“Zoning Petition”).¹ PPL Electric reviewed its plan to construct the Fountain Hill Substation with representatives of Salisbury Township and Lehigh County, and neither had any objection to the Project.

In support of this Zoning Petition, PPL Electric states as follows:

¹ PPL Electric believes its Control Equipment Building is not a “building” but, rather, is part of its substation facilities. Therefore, PPL Electric’s Control Equipment Building is exempt from local zoning requirements. *See, e.g., Duquesne Light Co. v. Upper St. Clair Township*, 377 Pa. 323, 334-35, 105 A.2d 287, 292 (1954). This Zoning Petition is being filed as a precaution in the event that the Commission were to determine that the Control Equipment Building is not a facility and, therefore, potentially subject to local zoning ordinances.

I. INTRODUCTION AND OVERVIEW

1. This Zoning Petition 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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PPL Electric's attorneys are authorized to receive all notices and communications regarding this Zoning Petition.

4. PPL Electric is a “public utility” and an “electric distribution company” as those terms are defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803. PPL Electric furnishes services 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.

5. PPL Electric owns approximately 5,000 miles of transmission lines operating at 69 kilovolts (“kV”) or higher, approximately 375 substations with a capacity of 10 megavolt-amperes (“MVA”) or more, and approximately 43,000 miles of distribution lines operating at less than 69 kV.

II. THE PROJECT

6. Simultaneously with the filing of this Zoning Petition, PPL Electric is filing the “Letter Of Notification Of PPL Electric Utilities Corporation File Pursuant To 52 Pa. Code Chapter 57, Subchapter G, With Respect To The Fountain Hill #1 And #2 138/69 kV Tap Line in Salisbury Township, Lehigh County” (“Siting Letter of Notification”). This Project is required to resolve violations of PPL Electric’s Reliability Principles and Practices (“RP&P”) guidelines in Salisbury Township, Lehigh County, Pennsylvania.” There, PPL Electric seeks approval from the Commission for the siting and construction of the Fountain Hill #1 and #2 138/69 kV Tap Line (“Fountain Hill Tap”).

7. The Fountain Hill Tap will supply the new Fountain Hill 69-12 kV Substation. The Fountain Hill Substation, in turn, will supply new distribution lines in the area which will be used to distribute electricity to customers. The Project includes the Fountain Hill Tap, the Fountain Hill Substation and related distribution facilities.

8. This Project is required to resolve violations of PPL Electric's Reliability Principles and Practices ("RP&P") guidelines. In addition, the Project will help meet the increasing demand for electricity in the area.

9. The total estimated cost of this Project is approximately \$2,166,000. This amount includes \$1,620,000 for the new substation, \$106,000 for transmission work and \$440,000 for distribution work.

10. Subject to the Commission's approval, construction on the Project is scheduled to start in May, 2012 in order to meet the required in-service date of May, 2013. The required in-service date is when the proposed facilities need to be placed in service to prevent equipment overloads that have the potential to damage existing facilities and, thereby, cause the interruption of service to customers.

11. The proposed Fountain Hill Substation will be located in Salisbury Township, Lehigh County. An aerial exhibit showing the location of the proposed facilities is provided as Attachment 2 to the Letter of Notification.

12. The Necessity Statement for the proposed construction of the Fountain Hill #1 & #2 138/69 kV Tap Line is provided as Attachment 1 to the Letter of Notification being filed simultaneously with this Petition. As explained there, this Project is necessary to comply with the reliability guidelines in PPL Electric's RP&P to meet load growth by relieving overloading on the nearby Elliot Heights 69-12 kV Substation and the Seidersville 39-2 12 kV distribution line and to provide operating flexibility to permit transfers of load to maintain or quickly restore service on distribution lines in the area.

13. Presently the Elliot Heights and Seidersville 69 – 12 kV Substations provide service to the area of concern. The Elliot Heights 69 – 12 kV Substation has two 69 – 12 kV

transformers that are energized from the two circuits of the Elliot Heights #1 and #2 138/69 kV Transmission Tap Line,. The Elliot Heights Substation currently supplies five 12 kV distribution lines, which serve a total of nearly 9,000 customers.

14. The Seidersville 69 – 12 kV Substation has two 69 – 12 kV transformers that are energized from the Fountain Hill – Quarry #1 and #2 138/69 kV Transmission Line. The Seidersville 69 – 12 kV Substation currently supplies five 12 kV distribution lines, which in total serve about 8,000 customers.

15. PPL Electric plans its system in accordance with its RP&P guidelines, so that PPL Electric can sustain probable contingencies and disturbances with 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 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.

16. 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. Forecasts take into account ambient temperatures and humidity indices.

17. 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 the model 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.

18. Due to the increasing demand for electricity, the Elliot Heights 69 – 12 kV Substation is expected to serve a peak load of approximately 37 MVA in the summer of 2012, which exceeds its rating of 35.5 MVA determined by its 12 kV underground transformer cables. If there were an outage of one transformer at the Elliot Heights Substation, and all load at Elliot Heights had be served by the remaining transformer, the underground cables could fail, interrupting service to nearly 5,000 customers until repairs can be made.

19. In addition to the concerns with loading at Elliot Heights Substation, the Seidersville 39-2 12 kV Distribution Line is expected to serve a peak load of 9.9 MVA in the summer of 2015. A portion of this line is composed of 2/0 copper conductor which has a normal planning loading guideline of 8 MVA in the RP&P. If this guideline is exceeded, there could be conductor damage or failure that could interrupt service to customers until repairs are made.

20. The Seidersville 39-2 Distribution Line is particularly important because it is the principal source of supply for the St Lukes' Hospital. In the event of an outage of the Seidersville 39-2 Distribution Line, the Hospital can be served through the Seidersville 39-4 Distribution Line. If load is transferred from the Seidersville 39-2 Distribution line to the 39-4 Distribution line, however, the load on the Seidersville 39-4 Distribution Line would exceed its

emergency planning guideline for a portion of the line. Exceeding the emergency planning guideline can result in damage to the line and could result in an outage of service to customers.

21. In addition, the Elliot Heights 12-4 12 kV Distribution Line has been one of PPL Electric's worst performing circuits in terms of outages in recent years.

22. To resolve the conductor and substation overload and reliability issues explained above, PPL Electric proposes construction of the new Fountain Hill Substation, which will be supplied by the Fountain Hill Tap, which is proposed in the Letter of Notification filed simultaneously with this Petition.

23. PPL Electric will own, operate and maintain the new Fountain Hill Substation and Fountain Hill Tap.

24. Two new 12 kV circuits which will be supplied from the Fountain Hill 69 – 12 kV Substation will initially be installed. The new Fountain Hill 69 – 12 kV Substation and the new 12 kV distribution circuits will allow load transfers to relieve the overloading on the Elliot Heights Substation and the Seidersville 39-2 Distribution Line.

25. The Fountain Hill Substation and new 12 kV distribution lines will tap into the Elliot Heights 12-4 12 kV distribution line, picking up its entire load. This load transfer will reduce loading at the Elliot Heights Substation by about 5.8 MVA, which will reduce load to a level well within RP&P guidelines.

26. In addition, the installation of motorized switching on this new distribution line will reduce restoration times on the former Elliot Heights 12-4 12 kV distribution line during outages by allowing remote operation of switching devices.

27. The second new circuit from the Fountain Hill Substation will tap into the Seidersville 39-2 Distribution Line picking up approximately 3.1 MVA of load which will bring load on the 2/0 Copper section well within the applicable RP&P planning guidelines.

28. Presently, St. Luke's Hospital is supplied by the Seidersville 39-2 12 kV Distribution Line. After the completion of the Fountain Hill Tap and Substation, it will be supplied by one of the new Fountain Hill circuits. Therefore, in addition to reducing the load on the Seidersville 39-2 12 kV distribution line, St. Luke's Hospital will be supplied from two separate substations, two separate transmission lines, and two separate distribution lines. These improvements will further improving the reliability of electric service to this critical human needs customer because, with two transmission lines, two substations and two distribution lines, service can be maintained or quickly restored in the event of an outage of either source of supply.

29. The new facilities will result in a reduced load on the new principal distribution line serving St. Luke's Hospital, one of the Fountain Hill Distribution Lines. Therefore, in the event of an outage of that line, the load that would be transferred to the Seidersville 39-4 Distribution Line will be reduced so that the total load will not exceed its emergency planning guideline.

30. The new substation will provide an additional source for load transfers between distribution circuits, which will improve the reliability and operating flexibility on the Elliot Heights and Seidersville 12 kV Distribution Lines.

III. THE PROPOSED CONTROL EQUIPMENT BUILDING

31. The new Fountain Hill Substation will include a Control Equipment Building. Substations must include certain control equipment, primarily switches, relays, and Supervisory Control and Data Acquisition ("SCADA") equipment to control the flow of electricity into, within, and from the substation. Much of this equipment, in order to function properly, must be

protected from the elements. The purpose of the proposed building in the Fountain Hill Substation is to protect the control equipment from the elements so that the line equipment, and the entire substation, can function properly.

32. The Control Equipment Building at the Fountain Hill Substation will be approximately 12 feet by 12 feet. It will be constructed on a concrete slab. The exterior walls will be constructed of corrugated metal. There will be minimal space heating and cooling equipment for the building. Such equipment will be installed solely for the purpose of keeping the temperature inside the building within limits tolerated by the control equipment. The building will not be intended for human occupancy; there will be no supply of water and no sanitary facilities.

33. The Fountain Hill Substation will be surrounded by a high fence to prevent entry by unauthorized persons. The fenced area for the Fountain Hill Substation will be 104 by 136 feet. Access to the substation, including the Control Equipment Building, must be limited because the high voltages at which the Substation will operate present dangers to untrained persons.

34. Provided as Attachment 1 hereto is an aerial map showing the location of PPL Electric's tract of land on which the proposed Fountain Hill Substation Control Equipment Building expansion will be constructed.

IV. THE MUNICIPALITIES PLANNING CODE

35. The Pennsylvania Municipalities Planning Code ("MPC") provides, in relevant part, as follows:

This article shall not apply to any existing or proposed building, or extension thereof, used or to be used by a public utility corporation, if, upon petition of the corporation, the Pennsylvania Public Utility Commission shall, after public hearing, decide that the present or proposed

situation of the building in question is reasonably necessary for the convenience or welfare of the public.

Section 619 of the MPC, Act of July 31, 1968, P.L. 805, *as amended*, 53 P.S. § 10619. Thus, a public utility building may be subject to local zoning requirements for buildings unless, upon petition, the Commission determines that the proposed situation of the building in question is reasonably necessary for the convenience and welfare of the public. 53 P.S. § 10619.

36. As explained above, the Control Equipment Building at the Fountain Hill Substation is reasonably necessary to meet the needs of the public for electricity. The Fountain Hill Substation must include certain control equipment in order to operate properly, and said equipment must be protected from the elements. The purpose of the Control Equipment Building at the Fountain Hill Substation is to provide that protection.

37. Because the Fountain Hill Substation is reasonably necessary for the public convenience and welfare and because the Control Equipment Building is necessary to properly operate the Fountain Hill Substation, the Commission should find that the Control Equipment Building is reasonably necessary and, therefore, exempt from the Salisbury Township's local zoning ordinance pursuant to Section 619 of the MPC. *Del-AWARE Unlimited, Inc. v. Pa. P.U.C.*, 513 A.2d 593 (Pa. Cmwlth. 1986).

[T]he Commission will consider the impact of its decisions upon local comprehensive plans and zoning ordinances. This will include reviewing applications for:

- (1) Certificates of public convenience.
- (2) Siting electric transmission lines.
- (3) Siting a public utility "building" under section 619 of the Municipalities Planning Code (53 P.S. § 10619).
- (4) Other Commission decisions.

52 Pa. Code § 69.1101.

V. **THE SALISBURY TOWNSHIP ZONING ORDINANCE**

38. On January 11, 2001, the Commission adopted a policy statement to further the Commonwealth's goal of making agency actions consistent with sound land use planning by considering the impact of its decision upon local comprehensive plans and zoning ordinances. See 31 Pa. Bull. 951 (Feb. 17, 2001). Section 69.1101 of the Commission's Policy Statement provides:

39. Salisbury Township has adopted a zoning ordinance, which includes a map on which zoning districts are identified. See *Salisbury Township Zoning Ordinance of 1993*. Ord. 5-93-372 of May 13, 1993, as amended ("Zoning Ordinance").² The location where PPL Electric proposes to construct the Fountain Hill Substation is designated as "C-R," Conservation Residential District.

40. Initially, it is noted that Salisbury Township's Zoning Ordinance expressly recognizes that there is an exemption from the Zoning Ordinance for public utility buildings under Section 619 of the MPC, which is quoted in pertinent part, above. Zoning Ordinance § 115. Therefore, the filing of this Zoning Petition by PPL Electric for an exemption is consistent with the Zoning Ordinance.

41. With respect to electric substations, the Zoning Ordinance provides the following:

"The following are permitted essential services and are required (except within § 115) to meet all of the applicable requirements of this chapter³]:

² A copy of the complete Zoning Ordinance can be found at the Salisbury Township website. The URL is as follows: http://www.salisburytownship.org/info_zoning_ordinance.shtml. PPL Electric is not attaching a copy of the ordinance with this Petition because the ordinance is almost 300 pages long.

³ Here, "chapter" refers to the entire Zoning Ordinance.

(1) Electrical substations Electric substations involving outdoor structures at least 10 feet in height shall be required to provide evergreen screening within the requirements of § 803 on sides that are within 150 feet of a dwelling, undeveloped residentially zoned land or an expressway or an arterial street. . . .”

42. PPL Electric will not be able to comply with certain provisions of Section 803 of the Salisbury Township Zoning Ordinance, and it would be unreasonable for PPL Electric to be required to comply with other provisions.

a. PPL Electric cannot provide evergreen screening along a portion of the south side of the Substation. Although the majority of the south side can be screened, the underground “getaway,” which will connect the Fountain Hill Substation to 69 – 12 kV substations, exits the property through the south side of the Substation. PPL Electric will not be able to plant evergreen trees in this area above the underground 69 kV distribution line.

b. Further, PPL Electric will not be able to plant evergreen trees along the west side of the substation due to the presence of a 12 kV distribution line.

c. The planting of evergreen trees on the north side of the Substation would be unreasonable because such plantings would require removal of natural deciduous trees presently growing there. Planting evergreens and removing existing deciduous trees would create a buffer that is inferior to the existing buffer.

43. Section 307 of the Zoning Ordinance sets forth the following requirements which could be interpreted, in the absence of an exemption, to apply to a Control Equipment Building:

Minimum lot size	2 acres
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Minimum lot width	200 feet
Minimum setback	
Front	50 feet
Side	25 feet
Rear Yard	100 feet
Maximum building coverage	10%
Maximum impervious coverage	15%

44. PPL Electric’s Fountain Hill Substation can comply with all of the requirements set forth in Paragraph 42, above, except the maximum impervious coverage. If the entire area that will be graveled is considered impervious under the Zoning Ordinance, the site would have approximately 27 percent impervious coverage, which is greater than the allowable 15 percent.

45. The Zoning Ordinance also places restrictions on heights of fences. Fences can be limited to 4 or 6 feet in height, depending on their location, although higher fences may be permitted to protect public safety against a specific hazard. Zoning Ordinance § 403. At this time, it is not known whether Salisbury Township would approve a higher fence around the Fountain Hill Substation. Further, under the Zoning Ordinance, fences are to be constructed of wood or wood-like material. Zoning Ordinance § 403. PPL Electric installs chain-link fencing to provide security for the substation and Control Equipment Building.

46. PPL Electric believes that Salisbury Township would consider its Control Equipment Building at the Fountain Hill Substation to be a structure under its Zoning Ordinance.

47. Under the Zoning Ordinance, construction of a structure is not permitted to commence until a building permit has been issued. Zoning Ordinance, § 108.

48. The process of obtaining a zoning permit, including possible appeals from the Board's decision, can be a long and time-consuming process, which could delay completion of the Project until long after the date when the Project is required to be in service in order to avoid conditions which could damage facilities and cause interruption of service to customers.

49. Further, under the Zoning Ordinance, the Board may have the power to add conditions to the approval of the Project, in addition to those required under the Ordinance. Zoning Ordinance § 106.

50. Such conditions, if imposed, could add to the cost of the Project, delay the Project or interfere with its operations.

51. The proposed Project, including the Control Equipment Building, was reviewed with representatives of Salisbury Township and Lehigh County. The Township and the County had no objection to the Project, including the Control Equipment Building.

52. As indicated in the attached certificate of service, PPL Electric is serving a copy of this Zoning Petition on Salisbury Township, the Salisbury Township Planning Commission, Lehigh County, and the Lehigh Valley Planning Commission.

53. Further, in all of its interactions with Salisbury Township and Lehigh County, PPL Electric will continue to apply its long-standing policy of cooperating with local governments.

54. The Control Equipment Building at the Fountain Hill kV Substation is necessary in order for PPL Electric to continue to provide adequate and reliable service. The proposed Substation, together with the related work on transmission and distribution facilities, will enable PPL Electric to continue to provide reliable and adequate service in the future. The Fountain Hill Substation is needed to improve the reliability of electric service in the Fountain Hill area.

55. For these reasons, PPL Electric requests that the Commission find that the Control Equipment Building expansion is reasonably necessary for the convenience or welfare of the public and is, therefore, exempt from the provisions of the Salisbury Township Zoning Ordinance.

VI. RELATED PROCEEDING

56. As explained above, simultaneously with the filing of this Zoning Petition, PPL Electric is filing a Siting Letter of Notification related to other portions of the same Project. PPL Electric asks that these two proceedings be consolidated for purposes of consideration and resolution because they contain common factual and legal matters.

VII. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission find that the expansion of the Control Equipment Building proposed by PPL Electric Utilities Corporation at the Fountain Hill 230-69 kV Substation is reasonably necessary for the convenience or welfare of the public and, therefore, is exempt from the Zoning Ordinance of Salisbury Township.

Respectfully submitted,



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Of Counsel:

Post & Schell, P.C.

Date: February 27, 2012

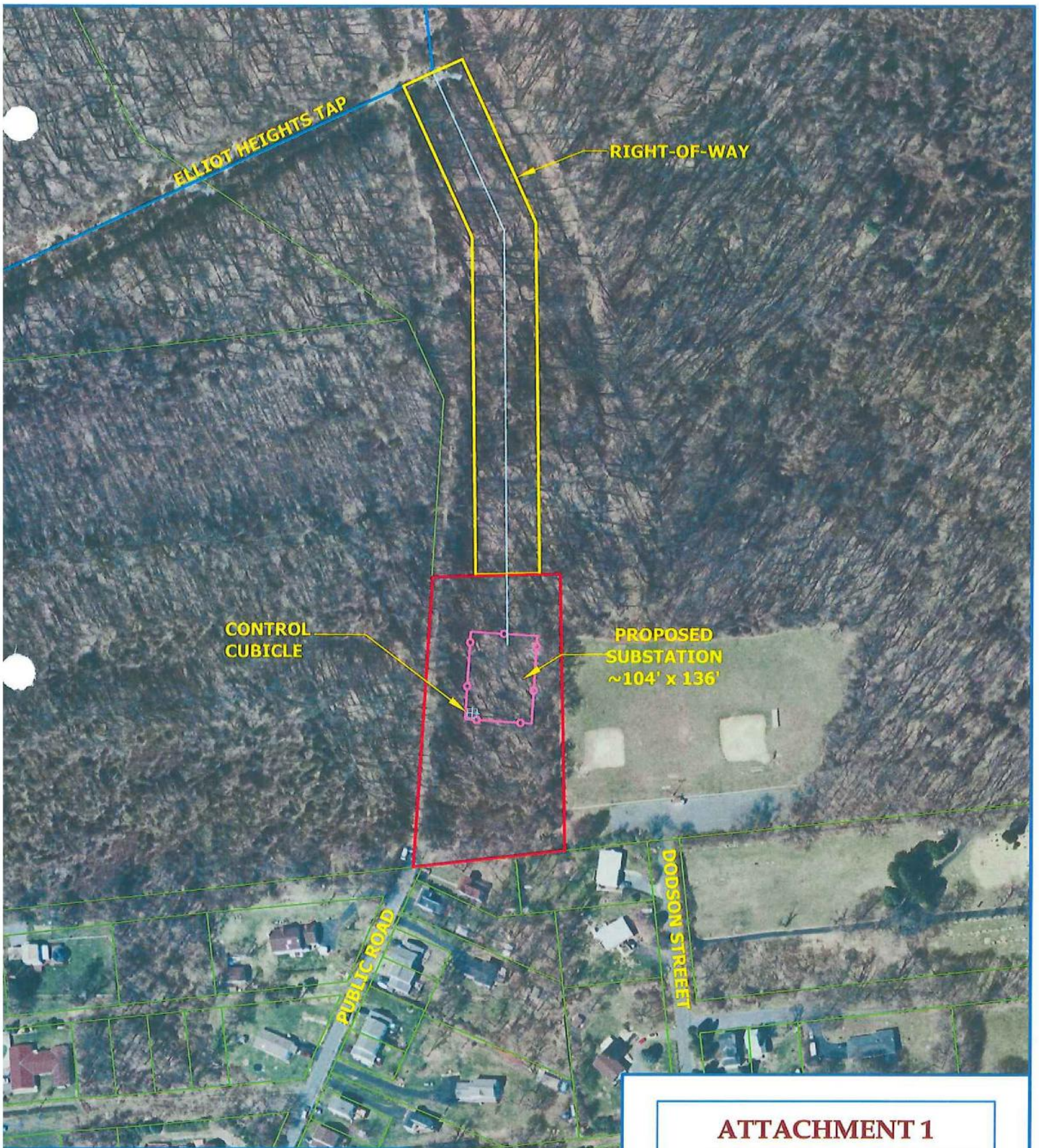
Attorneys for PPL Electric Utilities Corporation

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: 2/17/12





LEGEND

- EXISTING TRANSMISSION LINE
 - PROPOSED TRANSMISSION TAP
 - EXISTING PROPERTY LINE (APPROX.)
 - PROPOSED - PROPERTY LINE (APPROX.)
 - SUBSTATION FENCED AREA (APPROX.)
 - PROPOSED RIGHT-OF-WAY (APPROX.)
- SCALE 1" = 200'

ATTACHMENT 1

FOUNTAIN HILL SUBSTATION
 SALISBURY TOWNSHIP
 LEHIGH COUNTY, PA.



PREPARED BY:
 PPL ELECTRIC UTILITIES CORP.

PPL ELECTRIC UTILITIES