Before the
Pennsylvania Public Utility Commission

PAUPACK SUBSTATION BUILDING PETITION

Application Docket No. _____

Submitted by: PPL Electric Utilities Corp.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation for a Finding that a Building to Shelter Control Equipment at the Paupack 230-69 kV Substation to be Constructed in Paupack Township, Wayne County, Pennsylvania is Reasonably Necessary for the Convenience or Welfare of the Public	:	Docket No. P-2012-_____

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 Paupack 230-69 kV Substation ("Paupack Substation") in Paupack Township, Wayne County, Pennsylvania is reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance ("Zoning Petition").[1] Construction is scheduled to commence as soon as practical following Commission approval to meet a required

[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.

in-service date of November 2014. In support of this Zoning Petition, PPL Electric states as follows:[2]

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 as follows:

PPL Electric Utilities Corporation
Two North Ninth Street
Allentown, Pennsylvania 18101

3. PPL Electric's attorneys are:

Paul E. Russell (Bar I.D. #21643)
Associate General Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
Voice: 610.774.4254
Fax: 610.774.6726
E-mail: perussell@pplweb.com

David B. MacGregor (Bar I.D. #28804)
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
Voice: 215.587.1197
Fax: 215.320.4879
E-mail: dmacgregor@postschell.com

John H. Isom (Bar I.D. #16569)
Christopher T. Wright (Bar I.D. # 203412)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Voice: 717.731.1970
Fax: 717.731.1985
E-mail: jisom@postschell.com
E-mail: cwright@psotschell.com

[2] Contemporaneously with the filing of this Zoning Petition, PPL Electric is filing with the Commission a Letter of Notification requesting Commission approval of the siting and construction of the single-circuit Peckville-Paupack 230 kV Line and the single-circuit Paupack-Blooming Grove 230 kV Line. Issues relating to the necessity for and location of these Lines are interrelated with this Zoning Petition.

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 defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 102, 2803. PPL Electric furnishes electric distribution and provider of last resort electric supply 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 kV (kilovolts) or higher, approximately 375 substations with a capacity of 10 MVA (megavolts ampere) or more, and approximately 43,000 miles of distribution lines operating at less than 69 kV.

II. PROJECT SUMMARY

6. The proposed Paupack Substation is being planned in conjunction with two new single-circuit 230 kV lines each 0.9 miles in length, the Peckville-Paupack 230 kV Line and the Paupack-Blooming Grove 230 kV Line ("connecting 230 kV Lines"). Contemporaneously herewith, PPL Electric is filing a Letter of Notification seeking Commission approval of the siting and construction of the connecting 230 kV Lines ("Paupack LON"). The new 230 kV Lines will intersect the existing Peckville-Blooming Grove 230 kV Transmission Line and continue south to provide a 230 kV power source to the newly proposed Paupack Substation. These new connecting 230 kV Lines and Substation are needed to resolve violations of PPL Electric's "Reliability Principles & Practices" ("RP&P") guidelines described below and more

fully explained in Attachment 2 to the Paupack LON. PPL Electric's Paupack LON and supporting Attachments are incorporated herein by reference.

7. PPL Electric proposes to undertake three separate transmission projects to resolve violations of PPL Electric's RP&P guidelines and reinforce the 69 kV systems in Lackawanna and Wayne Counties. Each transmission line project will be the subject of a separate filing.[3]

8. Studies conducted for PPL Electric's transmission system revealed that an outage of the single circuit Blooming Grove-West Damascus 69 kV Transmission Line would violate PPL Electric's RP&P guidelines for load loss allowed due to a single-circuit contingency (unplanned outage). Together, the three separate transmission line projects, including the Paupack Substation and connecting 230 kV Lines, will replace a "weak link" in the 69 kV transmission system between the Peckville and Blooming Grove regional substations by replacing small, aging, low capacity #2/0 copperweld copper wire with larger, high capacity 556 kcmil[4] ACSR[5] wire.

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[3] The Letter of Notification for the second transmission line project is being filed contemporaneously herewith.

On April 30, 2012, PPL Electric filed a Letter of Notification for the first transmission line project, at Docket No. A-2012-2301698, which is currently pending before the Commission. Therein, PPL Electric seeks Commission approval for the reconstruction of 19.4 miles of the existing single circuit Peckville-Honesdale 69 kV Line for double circuit 138/69 kV operation. This line section will be rebuilt within the existing right-of-way as a double circuit 138/69 kV line, but 15 out of the 19.4 miles will initially operate as a single circuit 69 kV line. The reconstructed Peckville-Honesdale 138/69 kV Line is also needed to resolve violations of PPL Electric's RP&P guidelines and reinforce the 69 kV systems in Lackawanna and Wayne Counties. This part of the project was filed first because the expected construction time for it is substantially longer than the anticipated construction time for the other two parts of the transmission project. The Letter of Notification for this first transmission line project was also filed first to coordinate with the construction schedule of the previously approved Susquehanna-Roseland 500 kV Line, a portion of which the rebuilt Peckville-Honesdale 138/69 kV Line will parallel.

In the filings for the third transmission line project, PPL Electric will seek Commission approval for the reconstruction of a portion of the Lakeville 138/69 kV Tap and a portion of the existing Blooming Grove – Honesdale 138/69 kV Line. These line sections will be reconstructed from single circuit 138/69 kV lines to double circuit 138/69 kV lines. These reconstructed lines sections are also needed to resolve violations of PPL Electric's RP&P guidelines and reinforce the 69 kV systems in Lackawanna and Wayne Counties.

[4] Wire sizes are expressed in thousands of circular mils (kcmil). A circular mil is the cross-sectional area of a wire one mil in diameter, where 1 kcmil = 0.5067 mm^2.

[5] Aluminum conductor steel reinforced.

9. The Paupack Substation will be located entirely in Paupack Township, Wayne County, Pennsylvania. PPL Electric provided information regarding the Project to representatives from the Township and County; none of which had any objection to the project.

10. The Paupack Substation will be located entirely on land to be owned in fee by PPL Electric. The 0.9 mile connecting 230 kV Lines will be constructed within right-of-way previously acquired by PPL Electric and on the substation site for the Paupack Substation. An aerial plot plan is provided at the end of Attachment 2 to the Paupack LON. The plot plan depicts the location of the existing and proposed facilities.

11. The Paupack Substation, together with the connecting 230 kV Lines and the other two separate but related transmission line projects, will resolve violations of PPL Electric's RP&P guidelines, improve reliability, and increase operating flexibility of the 69 kV systems in Lackawanna and Wayne Counties.

12. Presently, the Blooming Grove-West Damascus 69 kV Line and Peckville-Varden 69 kV Line are the only two sources of electrical power to the northern Blooming Grove area.

13. The Blooming Grove-West Damascus 69 kV Line, including the related taps, is 38 miles in length. The majority of the Blooming Grove-West Damascus 69 kV Line is constructed for future 138 kV operation, but currently is operated at 69 kV. The line supplies one-half of the load at the Honesdale 69-12 kV Substation.

14. The Peckville-Varden 69 kV Line, including the related taps, is approximately 24 miles in length. From the Peckville Substation to the Varden Tap, the Peckville-Varden 69 kV Line is built on single-circuit 69 kV structures and is not constructed for future 138 kV operation. The Peckville-Varden 69 kV Line dates to the late 1920's, and is an insufficient electrical tie due to the small-sized conductor (#2/0 copperweld copper) and its length.

15. The Blooming Grove-West Damascus 69 kV Line is a radial line (only one source of electrical power) with only one 69 kV tie line (the Peckville-Varden 69 kV Line) to provide a back-up source of power. Transferring load between the Blooming Grove and Peckville regional substations is limited today because, as explained above, the Peckville-Varden 69 kV Line is an insufficient electrical tie due to its small-sized conductor (#2/0 copperweld copper).

16. Studies conducted for PPL Electric's transmission system revealed that, under winter peak conditions with all generation at Wallenpaupack out of service, the following single-circuit contingencies would occur by 2014 if an outage of the single-circuit Blooming Grove-West Damascus 69 kV Line occurred near the Blooming Grove 69-12 kV Substation:

(i) The interruption of 73 MW of load. This interruption would violate PPL Electric's RP&P guideline for maximum allowable load loss for a single-circuit line outage, which only allows up to 60 MW of load to be interrupted until manual sectionalizing can be performed.

(ii) Only the Honesdale 69-12 kV Substation load could be transferred over to the Peckville-Varden 69 kV Line without exceeding the winter emergency thermal rating of the conductor or causing low voltage levels. If the West Damascus 69-12 kV Substation load also were transferred, the Peckville-Varden 69 kV Line would be loaded to 106% of its winter emergency thermal rating, and the West Damascus 69 kV bus voltage would be at the lowest permissible limit.

(iii) The customer load served by the Tennessee Gas distribution substation (customer-owned), Indian Orchard distribution substation, West Damascus distribution substation, and Bohemia distribution substation would remain interrupted in order for the Power Dispatcher to restore 69 kV voltage along the line to the acceptable

lower limit. That outage would result in the interruption of 53 MW of load (approximately 9,500 customers) for an extended period of time until repairs could be made. This load loss would violate PPL Electric's RP&P guideline, which only allows up to 30 MW to be interrupted until repairs can be completed.

17. To resolve the single-circuit contingency issues described above, PPL Electric, with approval from the Commission, plans to construct three separate but related transmission line projects. After all three projects are complete, a single-circuit outage on the Blooming Grove-West Damascus 69 kV circuit occurring near the Blooming Grove Substation would interrupt no load for an extended period of time after switching is completed.

18. Studies conducted for PPL Electric's transmission system revealed that, under winter peak conditions with all generation at Wallenpaupack out of service, the following double-circuit contingencies would occur by 2014 if an outage of both the Blooming Grove-West Damascus and Blooming Grove-Honesdale 69 kV lines occurred near the Blooming Grove Substation:[6]

(i) Interruption of 133 MW of load. This interruption would violate PPL Electric's RP&P for maximum allowable load loss for a double-circuit line outage, which allows only 120 MW or less to be interrupted until manual sectionalizing can be performed.

(ii) The load served by the Tennessee Gas distribution substation (customer), Bohemia distribution substation, Kimbles distribution substation, and Tafton distribution substation would remain out of service in order for the Power

[6] From the Blooming Grove Substation to the Kimbles 69-12 kV Substation, the Blooming Grove-West Damascus 69 kV circuit is built on double-circuit 69 kV structures, sharing the line route and those structures with the Blooming Grove-Honesdale 69 kV circuit.

Dispatcher to restore 69 kV voltage along the line to the acceptable lower limit. The outage would result in approximately 68 MW that would remain interrupted for an extended period of time until repairs can be completed. This load loss would violate PPL Electric's RP&P guideline for maximum allowable load loss for a double-circuit line outage, which only allows up to 45 MW of load to be interrupted until overhead line repairs can be completed.

(iii) The projected loading on the Blooming Grove-West Damascus 69 kV Line will be 72 MW. This violates the RP&P guideline, which recommends that loading on a 69 kV not exceed 60 MW so that the load from an out-of-service line can be transferred to the remaining in-service line and still operate that line within its emergency ampacity rating while maintaining acceptable voltage.

19. After completion of the Paupack Substation, together with connecting 230 kV Lines and the third transmission line project, a double-circuit outage on the Blooming Grove-West Damascus and Blooming Grove-Honesdale 69 kV single circuits occurring near the Blooming Grove Substation would result in 0 MW that would remain interrupted for an extended period of time after switching is completed.

20. A detailed explanation of the need for the Paupack Substation and connecting 230 kV Lines is set forth in Attachment 1 to the Paupack LON.

21. The total estimated cost of the Project is approximately $22.3 million, which includes approximately $1.7 million for the new connecting 230 kV Lines.

22. The new Paupack Substation will include a Control Equipment Building. The Paupack Substation must include certain switches, relays, and other control equipment to control the flow of electricity into, within, and from the substation. In order to function properly, much

of this equipment must be protected from the elements. The purpose of the Control Equipment Building is to protect the control equipment at the proposed Paupack Substation from the elements so that the control equipment, and the entire substation, can function properly.

23. The Control Equipment Building will be approximately 40 feet by 60 feet. It will be constructed on a concrete slab. The exterior walls will be constructed of corrugated aluminum. 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 the limits required for the control equipment to operate properly. The Control Equipment Building will not be intended for human occupancy; there will be no supply of water and no sanitary facilities.

24. The Paupack Substation will be surrounded by a 8-foot high fence to prevent entry by unauthorized persons. The fenced area for the Paupack Substation will be approximately 400 feet by 690 feet. Access to the Substation, including the Control Equipment Building, must be limited because the high voltages at which the substation will operate present hazards to untrained persons. The Control Equipment Building will be contained within the fenced perimeter of the Substation.

25. The Paupack Substation will be located on a 35-acre tract of land in Paupack Township, Wayne County. The entire 35-acre site for the proposed Paupack Substation will be owned in fee by PPL Electric. The Paupack Substation fence area will only occupy approximately 7 acres.

26. The new Paupack Substation will be located near the Lakeville Tap between the Blooming Grove and Peckville Substations, which is more centrally located to the load it will serve. The Paupack Substation will tie into the Blooming Grove-Honesdale and Blooming

Grove-West Damascus 139/69 kV lines, will reduce the load on these lines by providing a new 230 kV source, and will reduce the exposure of each line through expected resectionalizing.[7] The Paupack Substation will provide a backup source to the Blooming Grove and Peckville Substations using interconnected 69 kV lines. This backup source would be needed during a single contingency outage of one or more of these lines.

27. Further, the location of the Paupack Substation is advantageous because the 230 kV source transmission line, the existing Blooming Grove-Peckville 230 kV Transmission Line, is located in close proximity to the proposed Paupack Substation site. Consequently, the connecting 230 kV Lines will only extend 0.9 miles to connect the proposed Substation to the 230 kV electric grid. Additionally, by siting the Paupack Substation within close proximity to the existing transmission source, PPL Electric can minimize the costs and environmental impacts of the connecting 230 kV Lines supplying the Substation.

28. Provided as "Attachment 1" hereto is an aerial exhibit showing the location of the tract of land on which the proposed Paupack Substation, together with the Control Equipment Building, will be constructed.

III. EXEMPTION FROM LOCAL ZONING

29. 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.

[7] Portions of the Blooming Grove-West Damascus and Blooming Grove-Honesdale 69 kV lines will become the new Paupack-Honesdale #1 and Paupack-Honesdale #2 69 kV lines that are the subject of the filings for the third transmission line project.

Section 619 of the MPC, Act of July 31, 1968, P.L. 805, *as amended*, 53 P.S. § 10619. Thus, a municipality may zone a public utility building unless the Commission determines that the building is reasonably necessary for the convenience or welfare of the public. If the Commission finds that the building is reasonably necessary, the building is exempt from local zoning ordinances under the MPC. *Del-AWARE Unlimited, Inc. v. Pa. P.U.C.*, 513 A.2d 593, 596 (Pa. Cmwlth. 1986).

30. As explained above, and more fully in the Paupack LON and supporting Attachments, the Paupack Substation, together with the connecting 230 kV Lines and two other separate but related transmission projects, is necessary to resolve violations of reliability criteria, increase the operating flexibility, and reinforce the 69 kV systems in Lackawanna and Wayne Counties. The Paupack Substation must include certain control equipment in order to operate properly, and said equipment must be protected from the elements. The most efficient and appropriate means of protecting the equipment at this substation is construction of a Control Equipment Building on the site proposed for the Paupack Substation.

31. Because the Paupack Substation is reasonably necessary for the public convenience and welfare, the Commission should find that the Control Equipment Building is reasonably necessary and, therefore, exempt from the Paupack 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).

IV. THE PAUPACK TOWNSHIP ZONING ORDINANCE

32. 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 Regulations provides:

> [T]he Commission will consider the impact of its decisions upon local comprehensive plans and zoning ordinances. This will include reviewing applications for:
>
> ***
>
> (2) Siting electric transmission lines.
>
> (3) Siting a public utility "building" under section 619 of the Municipalities Planning Code (53 P.S. § 10619)....

52 Pa. Code § 69.1101.

33. Paupack Township has adopted a zoning ordinance, a copy of which is attached hereto as "Attachment 2." *See* PAUPACK TOWNSHIP ZONING ORDINANCE, *as amended* (February 12, 2003) (hereinafter "Zoning Ordinance"). Under the Zoning Ordinance, a building/zoning permit is required for the construction of any building. *See* Zoning Ordinance, Article XVI, § 1602, p. 81.

34. The Zoning Ordinance defines a "building" as any structure permanently affixed to the land having a roof supported by columns or walls used for housing, shelter or enclosure of persons, animals or property. *See* Zoning Ordinance, Article III, § 302.A, p. 7. In turn, the Zoning Ordinance defines a "structure" to include a man-made object having an ascertainable stationary location on land. *See* Zoning Ordinance, Article III, § 302.A, p. 25.

35. With respect to public utility facilities, the Zoning Ordinance defines "essential services" to include the construction, alteration, or maintenance of, by public utilities, underground or overhead transmission systems, poles, wires, or other similar equipment. *See* Zoning Ordinance, Article III, § 302.A, p. 12. The Zoning Ordinance further defines "public

uses" to include public and semi-public uses, including essential public utilities that require enclosure within a building. *See* Zoning Ordinance, Article III, § 302.A, p. 20.

36. The site for the proposed Paupack Substation currently is zoned as a Rural Residential District. The Zoning Ordinance does not permit either "essential services" or public uses" in a Rural Residential District. *See* Zoning Ordinance, Article V, § 502, p. 34. Rather, the Zoning Ordinance provides that public utility uses and public utility facilities, including facilities incidental to such uses, are only permitted in a Rural Residential District upon obtaining approval of a special exception. *See* Zoning Ordinance, Article V, § 504, p. 35.

37. Based on the foregoing, in the absence of a finding by the Commission under Section 619 of the MPC, it is unlawful under the Zoning Ordinance for PPL Electric to commence work on and begin to use the Control Equipment Building at the Paupack Substation without first applying for and obtaining from the Paupack Zoning Hearing Board (i) approval to operate the Substation and related facilities as a special exception in a Rural Residential District, and (ii) a building/zoning permits to construct the Control Equipment Building. In order to obtain such permits, PPL Electric must follow the permitting procedures set forth in the Zoning Ordinance, including the payment of fees. *See* Zoning Ordinance, Article XVI, §§ 1601-1626.

38. If PPL Electric were required to apply for and obtain building/zoning permits and approval of a special exception in a Rural Residential District prior to the construction and use of the Control Equipment Building, the process, including appeals from adverse determinations, could consume substantial time, which could delay the construction of the Paupack Substation and the connecting 230 kV Lines, as well as the third transmission line project, which are all reasonably necessary for the convenience or welfare of the public as explained above. Construction on the Paupack Substation and the connecting 230 kV Lines is scheduled to begin

as soon as practical following Commission approval to meet a required in-service date of November 2014. The required in-service date is the date 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.

39. Furthermore, if PPL Electric were required to apply for and obtain approval of a special exception prior to the construction and use of the Control Equipment Building, PPL Electric could be subject to any condition and/or safeguard that the Paupack Zoning Hearing Board deemed advisable and appropriate, despite the fact that local municipalities lack the authority to regulate the design, location, or construction of public utility facilities.[8]

40. PPL Electric has provided information to representatives of Paupack Township and Wayne County describing the Project. These entities have not objected to the Project. Further, as indicated in the attached certificate of service, PPL Electric is serving a copy of this Zoning Petition on the Paupack Township Planning Board, Paupack Township Board of Supervisors, Wayne County Commissioners, and Wayne County Planning Commission.

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[8] The lack of authority for a local municipality to regulate the design, location, or construction of public utility facilities is consistent with the long line of cases holding that public utilities are exempt from local ordinances. *See Duquesne Light Company v. Monroeville Borough*, 449 Pa. 573. 580, 298 A.2d 2352 (1972) ("This Court has consistently held, however, that the Public Utility Commission has exclusive regulatory jurisdiction over the implementation of public utility facilities") (citations omitted). *See, e.g., County of Chester v. Philadelphia Elec. Co.*, 420 Pa. 422, 218 A.2d 331 (1966) (holding that regulation by a multitude of jurisdictions would result in "twisted and knotted" public utilities with consequent harm to the general welfare); *Newtown Twp. v. Philadelphia Elec. Co.*, 594 A.2d 834, 837 (Pa. Cmwlth. 1991) (noting that "it is clear that no 'implied' power exists in the MPC which would allow the Township to regulate [the Philadelphia Electric Company] through its subdivision and land development ordinance"); *Heintzel v. Zoning Hearing Bd. of Millcreek Twp.*, 533 A.2d 832 (Pa. Cmwlth. 1987) (holding that township had no power to regulate, under its zoning ordinance, city's erection of water tower because that power was under the exclusive jurisdiction of the PUC); *South Coventry Twp. v. Philadelphia Elec. Co.*, 504 A.2d 368 (Pa. Cmwlth. 1986) (noting that to possibly subject [the Philadelphia Electric Company] to a miscellaneous collection of regulations upon its system would clearly burden and indeed disable it from successfully functioning as a utility); *Commonwealth v. Delaware and Hudson Railway Co.*, 339 A.2d 155 (Pa. Cmwlth. 1975) (holding that the MPC did not authorize local governments to regulate public utilities in any manner which infringes upon the power of the Commission to so regulate).

41. In addition, in all of its interactions with Wayne County, Paupack Township, and their respective planning commissions, PPL Electric will continue to apply its long-standing policy of cooperating with local governments.

42. For these reasons, PPL Electric requests that the Commission find that the Control Equipment Building at the proposed Paupack Substation is reasonably necessary for the convenience or welfare of the public and is, therefore, exempt from the requirements of the Zoning Ordinance that may, in the Paupack Township's opinion, impose any restriction, condition, or regulation on the construction of the Control Equipment Building at the Paupack Substation.

V. RELATED PROCEEDINGS

43. Contemporaneously with the filing of this Zoning Petition, PPL Electric is filing with the Commission the Paupack LON. Therein, PPL Electric is requesting approval for the siting and construction of the Peckville-Paupack 230 kV Line and the Paupack-Blooming Grove 230 kV Line, which will be connected to and supply the proposed Paupack Substation, including the Control Equipment Building that is the subject of this Zoning Petition. Issues relating to the necessity for and location of the connecting 230 kV Lines are interrelated with this Zoning Petition.

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

VI. CONCLUSION

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

Respectfully submitted,

David B. MacGregor (ID # 28804)
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
Phone: 215-587-1197
Fax: 215-320-4879
E-mail:dmacgregor@postschell.com

John H. Isom (ID # 16569)
Christopher T. Wright (ID # 203412)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: jisom@postschell.com
E-mail: cwright@postschell.com

Attorneys for PPL Electric Utilities Corporation

Paul E. Russell (ID # 21643)
Associate General Counsel
PPL Services Corporation
Office of General Counsel
Two North Ninth Street
Allentown, PA 18106
Phone: 610-774-4254
Fax: 610-774-6726
E-mail:perussell@pplweb.com

Of Counsel:

Post & Schell, P.C.

Date: June 11, 2012

VERIFICATION

I, David J. Bonenberger, being the General Manager of Transmission and Substations 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: 6/7/12

David J. Bonenberger