

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification of PPL Electric :
Utilities Corporation, Filed Pursuant to :
52 Pa. Code Chapter 57 Subchapter G, : Docket No. A-2012-_____
for Approval to Construct and Relocate :
Transmission Line Connections :
Associated with the Proposed :
Breinigsville 500-138-69 kV Substation :
in Upper Macungie Township, Lehigh :
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, relocation, and re-termination of transmission lines in preparation for the construction of the proposed Breinigsville 500-138-69 kV Substation in Upper Macungie Township, Lehigh County, Pennsylvania (“Breinigsville Project”). PPL Electric has provided information regarding this Project to these political subdivisions, and none of them have objected to the Project.

This Project will resolve identified transmission reliability criteria violations, meet increasing load, and maintain reliable electric service to customers in portions of the Upper Macungie, Lower Macungie, and Upper Milford Townships of Lehigh County. Subject to the Commission’s approval, construction is scheduled to begin in October

2012, to support the Project's in-service date of May 2015. In support thereof, PPL Electric states as follows:

I. INTRODUCTION

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 as follows:

PPL Electric Utilities Corporation
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3. PPL Electric's attorneys are:

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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. PPL Electric proposes to build a new substation, the Breinigsville 500-138-69 kV Substation (“Breinigsville Substation”), to resolve identified transmission reliability criteria violations. In preparation for the construction of the new Breinigsville Substation, PPL Electric herein seeks Commission approval to construct, relocate, and re-terminate the connecting transmission lines associated with the new Breinigsville Substation.

7. This Letter of Notification includes the following accompanying attachments:

- Attachment 1 Necessity Statement.
- Attachment 2 Engineering Description.
- Attachment 3 Environmental Assessment.
- Attachment 4 PPL Electric Design Criteria and Safety Practices.
- Attachment 5 Magnetic Field Management Program.
- Attachment 6 Owner of Property

- Attachment 7 List of Involved Governmental Agencies, Municipalities, and Other Public Entities.

8. 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).

II. THE PROJECT

A. OVERVIEW

9. PPL Electric proposes to build the new Breinigsville Substation to resolve violations of the PJM Interconnection, L.L.C. (“PJM”) Reliability Planning Criteria as defined in “Manual 14B: PJM Region Transmission Planning Process” (PJM Manual 14B) and PPL Electric’s Reliability Principles and Practices (RP&P), to meet increasing load, and to maintain reliable electric service to customers in portions of the Upper Macungie, Lower Macungie, and Upper Milford Townships of Lehigh County.

10. In preparation for the construction of the new Breinigsville Substation, PPL Electric herein seeks Commission approval of the following: (1) re-routing approximately 3,300 feet of the existing AT&T #1 and #2 138/69 kV Tap Line (AT&T Tap Line) to create the required space for construction of the new Breinigsville Substation; (2) splitting and re-terminating approximately 1,525 feet of the existing Albertis-Wescosville 500 kV Transmission Line into the new Breinigsville Substation; and (3) constructing approximately 325 feet of new double-circuit new Breinigsville-Wescosville #1 & #2 138/69 kV Transmission Line (“Breinigsville-Wescosville Transmission Line”) to connect the relocated portion of the AT&T Tap Line to the 69 kV yard at the new Breinigsville Substation.

11. The estimated cost of the proposed Breinigsville Project is approximately \$43.8 million, which includes \$2,900,000 for the constructing and relocation of the proposed transmission lines.

12. The Breinigsville Project is being carefully planned to coordinate with and take advantage of a planned outage of the Susquehanna-Wescosville-Alburtis 500 kV Transmission Line that ultimately will be re-terminated and connected to the proposed Breinigsville 500-138-69 kV Substation. Subject to the Commission's approval, construction of the three parts of the proposed Project will be completed as follows: (1) re-routing a segment of the existing AT&T Tap Line is scheduled to begin in October 2012 and be completed by May 2013 to accommodate the scheduled construction of the new Breinigsville Substation; (2) splitting and re-terminating the existing Alburtis-Wescosville 500 kV Transmission Line into the Breinigsville Substation is scheduled to begin by October 2012 to coordinate with planned outages of the Susquehanna-Wescosville-Alburtis 500 kV Transmission Line; and (3) constructing the new double-circuit Breinigsville-Wescosville Transmission Line to connect the relocated AT&T Tap Line with the Breinigsville Substation is scheduled to coordinate with the construction of the Breinigsville Substation and be completed by May 2015. The Project's overall in-service date is May 2015.

13. As explained below, PPL Electric does not require any additional right-of-way for the Breinigsville Project.

14. An aerial plot plan is provided at the end of Attachment 2 to this Letter of Notification. The plot plan depicts the location of the existing and proposed transmission facilities for this Project.

B. NEED FOR THE PROJECT

1. Transmission Planning

15. The North American Electric Reliability Corporation (“NERC”) has developed mandatory reliability standards, which define the reliability requirements for planning and operating transmission systems in North America. The NERC Reliability Standards apply to all users, owners, and operators of the nation’s interconnected transmission grid, including PPL Electric. NERC achieves compliance through monitoring, audits, investigations, the imposition of financial penalties, and other enforcement actions for non-compliance. PPL Electric’s transmission planning has adopted and incorporated the NERC Reliability Standards. A further description of the NERC Reliability Standards is provided in Attachment 1 to this Letter of Notification.

16. PJM is the Federal Energy Regulatory Commission-approved Regional Transmission Organization charged with ensuring the reliability of the electric transmission system under its functional control and coordinating the movement of electricity in all or parts of thirteen states and the District of Columbia, including most of Pennsylvania. PPL Electric, as an owner of transmission facilities in Pennsylvania, is a member of PJM and actively participates in the PJM transmission planning process.

17. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”) to identify system reinforcements that are required to, among other things, meet the mandatory NERC Reliability Standards. A further description of PJM’s RTEP process is provided in Attachment 1 to this Letter of Notification.

18. PJM has developed the PJM Reliability Planning Criteria as set forth in the PJM Manual 14B. The PJM Reliability Planning Criteria consist of multiple

standards and applicable planning principles that include PJM planning procedures, NERC Planning Standards, NERC Regional Council planning criteria, Reliability First Corporation Standards, and Transmission Owner-defined reliability criteria (in this case, the PPL Electric RP&P). PJM applies all applicable planning criteria when identifying reliability problems and determining the need for transmission system upgrades in the PJM service territory. As a transmission owner in the PJM service territory, PPL Electric is required to follow the PJM Reliability Planning Criteria.

19. PPL Electric undertakes an independent analysis of both its bulk electric system (BES) transmission facilities, which include transmission facilities operated at voltages of 100 kV or higher and are under the functional control of PJM, and its non-bulk electric system transmission facilities. The PPL Electric planning guidelines are outlined in the RP&P, which was developed to ensure adequate and appropriate levels of electric service to its customers consistent with good utility practice. The PPL Electric RP&P for the bulk electric system is consistent with the NERC Reliability Standards and PJM Reliability Planning Criteria. A further description of PPL Electric's system planning process is provided in Attachment 1 to this Letter of Notification.

20. The Necessity Statement for the proposed Breinigsville Project is provided as Attachment 1 accompanying this Letter of Notification. As explained in greater detail therein, the purpose of the project is to resolve reliability violations of the PJM Reliability Planning Criteria and PPL Electric RP&P, to meet increasing load growth, and to maintain reliable electric service to customers in portions of the Upper Macungie, Lower Macungie, and Upper Milford Townships of Lehigh County.

2. Existing System

21. Customers in the western portion of Lehigh County primarily are served by the Wescosville 500-230-138-69 kV Substation (“Wescosville Substation”). Presently, approximately 27,000 customers (approximately 300 MVA of load) in western Lehigh County are served from the 69 kV yard at the Wescosville Substation.

22. The Wescosville Substation is supplied by the existing Susquehanna-Wescosville-Alburtis 500 kV Line, which is connected to the 500 kV yard

23. The Wescosville Substation currently has four transformers: the T1 138-69 kV transformer, the T2 230-69 kV transformer, the T3 500-138 kV transformer, and the T4 138-69 kV transformer.

24. The 138 kV yard at the Wescosville Substation is supplied by the T3 500-138 kV transformer. The 138 kV yard feeds four 138 kV lines and the T1 and T4 138-69 kV transformers at the Wescosville Substation.

25. The T1 and T4 138-69 kV transformers at the Wescosville Substation feed the 69 kV yard. The 69 kV yard feeds six 69 kV lines, including the Wescosville-Trexlerstown #1, #2, #3, and #4 138/69 kV Transmission Lines. The AT&T Tap Line is connected to and supplied by the Wescosville-Trexlerstown #1 & #2 138/69 kV Transmission Line.

26. The T2 230-69 kV transformer at the Wescosville Substation can also supply the 69 kV yard. However, due to the criticality of the 69 kV bus at the Wescosville Substation, the T2 230-69 kV transformer does not normally carry load and serves as an emergency backup source in the event of a loss of one of the T1 or T4 138-69 kV transformers.

27. The basic functional arrangement of the existing transmission system in the region is shown in Figure 1 of Attachment 1 to this Letter of Notification.

3. Reliability Violations

28. The violations of the PJM Reliability Planning Criteria and PPL Electric RP&P were first identified in the 2010 RTEP, which was approved by the PJM Board in November 2010. Specifically, the 2010 RTEP identified a load loss violation and a thermal overload for an N-1 event.

29. Load growth in the western Lehigh area has been increasing beyond normal load growth projections with new industrial, commercial, and residential loads. As a result, the Wescosville Substation serving customers in this region has become heavily loaded.

30. PPL Electric's transmission planning studies indicate that, by the summer of 2015, the peak load on the 69 kV yard at the Wescosville Substation will be approximately 300 MVA. A failure to relieve the loading on the Wescosville Substation could result in thermal damage to either the T1 or T4 138-69 kV transformer, an N-1 event, if either transformer were lost. This could put approximately 300 MVA of load, approximately 27,000 customers, served by the Wescosville Substation at risk of being interrupted. This load loss would violate the PJM Reliability Planning Criteria identified in Manual 14B, which limits load loss to 300 MW for all criteria tests.

31. Although the T2 230-69 kV transformer could be placed into network operation via Supervisory Control and Data Acquisition ("SCADA") by the Transmission System Operator, it would only be able to restore approximately 230 MVA of load. Further, due to the limited transfer capability of the existing system, only approximately 40 MVA of load could be supplied from alternate sources. Consequently, if either the T1 or T4

transformer were lost, about 30 MVA of load would experience an extended interruption until a mobile transformer could be installed on an emergency basis.

32. A contingency loss of either the T1 or T4 138-69 kV transformer at the Wescosville Substation, an N-1 event, also will overload the remaining transformer to 112% of its summer 2-hour emergency rating¹ of 269 MVA, which would be a violation of both the PPL Electric RP&P guidelines and PJM Planning Criteria.²

33. Although the T2 230-69 kV transformer at the Wescosville Substation could be placed into network operation via SCADA control, it would only slightly reduce the loading on the remaining 138-69 kV transformer. As such, even with the support of the T2 230-69 kV transformer, the load on the remaining 138-69 kV transformer would be approximately 100% of its one month thermal rating³ of 231 MVA.

34. In addition, a contingency loss of the T3 500-138 kV transformer at the Wescosville Substation, and N-1 event, would result in an 8% voltage drop on the networked 138 kV lines between the Wescosville Substation and the Siegfried 230-138-69 kV Substation. This voltage drop would violate the maximum allowable voltage drop of 5% permitted after a contingency as set forth in both the PPL Electric RP&P guidelines and PJM Planning Criteria.

35. Further, a double-circuit outage of the Wescosville-Trexlertown #1 & #2 138/69 kV Transmission Line would initially interrupt approximately 150 MW of load. The load interrupted by this contingency would exceed the RP&P guideline for maximum

¹ The 2 hour emergency rating is used for the initial loss of one transformer. The remaining transformers must be below the 2 hour emergency rating after the loss of the first transformer.

² If the T1 138-69 kV transformer were lost, the T4 138-69 kV transformer would become overloaded and vice versa.

³ The one month thermal rating is used after another transformer is put in service via SCADA to relieve the loading on the remaining transformer. It takes approximately one month to install a replacement transformer.

allowable load drop due to a double-circuit outage, which only allows a maximum of 120 MW of load to be interrupted for up to 2 hours until manual switching can be completed.

36. In addition, a single-circuit outage of either circuit on the Wescosville-Trexlerstown #1 or #2 138/69 kV Transmission Line would initially interrupt approximately 75 MW of load. The load interrupted by this contingency would exceed the RP&P guideline for maximum allowable load drop due to a single-circuit outage, which only allows a maximum of 60 MW of load to be interrupted for up to 2 hours until manual switching can be completed.

37. The Wescosville-Trexlerstown #1 & #2 138/69 kV Transmission Line normally has open ties to the Wescosville-Trexlerstown #3 & #4 138/69 kV Transmission Line. However, transferring load from the Wescosville-Trexlerstown #1 & #2 138/69 kV Transmission Line to the Wescosville-Trexlerstown #3 & #4 138/69 kV Transmission Line to reduce loading below the RP&P guidelines for maximum allowable load drop is not a viable option because this Line is also heavily loaded.

C. THE PROPOSED PROJECT

38. To resolve the reliability criteria violations described above, PPL Electric proposes to construct the new Breinigsville 500-138-69 kV Substation⁴ and connecting lines.

39. The new Breinigsville Substation will provide load relief for the T1 and T4 138-69 kV transformers at the Wescosville Substation, as well as load relief for the Wescosville-Trexlerstown #1 & #2 138/69 kV Transmission Line. The new Breinigsville

⁴ Although a temporary 69 kV yard will temporarily be installed at the Breinigsville 500-138-69 kV Substation, the Substation will be designed to accommodate the future 500 – 138 kV arrangement. Conversion to 138 kV is expected within 10 years from the installation of the Substation.

Substation will enable approximately 120 MVA of load to be transferred from the heavily loaded Wescosville Substation.

40. Upon completion of the Breinigsville Substation, the load on each of the T1 and T4 138-69 transformers at the Wescosville 500-230-138-69 kV Substation will be reduced from approximately 150 MVA to 85 MVA of load during the summer of 2015.

41. Further, the loading on the Wescosville-Trexlerstown #1 & #2 138/69 kV Transmission Line will be reduced from approximately 80 MVA to approximately 20 MVA during the summer of 2015.

42. In addition, the new Breinigsville Substation will allow for the implementation of the future plan to convert the area to 138 kV operation. Load from Wescosville Substation will be transferred to Breinigsville Substation while the 138 kV yard at the Wescosville Substation is expanded to accommodate additional 138 kV bays.

43. The new Breinigsville Substation and connecting lines will resolve all the identified violations of the PJM Planning Criteria and PPL Electric RP&P.

44. The Breinigsville Project is being carefully planned to coordinate with and take advantage of a planned outage of the Susquehanna-Wescosville-Alburtis 500 kV Transmission Line that will ultimately be re-terminated and connected to the proposed Breinigsville Substation.

45. Pending approval by the Commission, the transmission line work for this Project will be completed in three parts: (1) re-routing a segment of the existing AT&T Tap Line around the proposed Breinigsville Substation; (2) splitting and re-terminating the existing Alburtis-Wescosville 500 kV Transmission Line into the Breinigsville Substation; and (3) constructing the new double-circuit Breinigsville-Wescosville

Transmission Line to connect the relocated AT&T Tap Line with the Breinigsville Substation. Without this transmission work, the new Breinigsville Substation cannot be placed in service.

46. The three parts of the transmission line portion of the Breinigsville Project are summarized below. The engineering description of these parts of the Breinigsville Project is more fully explained in Attachment 2 to this Letter of Notification.

1. Relocation of the AT&T Tap Line.

47. Part one of the Breinigsville Project involves re-routing approximately 3,300 feet of the AT&T Tap Line to create the required space for construction of the proposed Breinigsville Substation.

48. The relocation of the AT&T Tap Line requires the installation of 4 double-circuit poles and 2 single-circuit tap poles that will be located approximately 2200 feet from the existing location of the AT&T Tap Line. The poles will have a height of 105 feet.

49. Six power conductors and one overhead groundwire will be installed. The power conductors will be 556.5 kcmil⁵ 24/7 stranding ACSR.⁶ The overhead ground wire will be either 3/8-inch or 1/2-inch diameter high strength steel and will provide lightning protection for the relocated section of AT&T Tap Line.

50. This part of the Project is scheduled to begin in October 2012 and be completed by March 2013 to accommodate the scheduled construction of the new Breinigsville Substation.

⁵ Kcmil stands for thousand circular mills. Kcmil wire size is the equivalent cross sectional area in thousands of circular mils. A circular mil is the area of a circle with a diameter of one thousandth (.001) of an inch.

⁶ ACSR stands for aluminum conductor steel reinforced

51. The estimated cost of this part of the Project is \$1.45 million.

2. Re-Terminating the Albertis-Wescosville 500 kV Transmission Line

52. Part two of the Project involves splitting the existing Wescosville-Albertis 500 kV Transmission Line, near the location of the new Breinigsville Substation, and re-terminating the Line into the 500 kV yard at the new Breinigsville Substation.

53. The split and re-termination of the Wescosville-Albertis 500 kV Transmission Line requires the removal of one existing transmission line steel pole structure. The proposed modification will be designed to accommodate a single-circuit 500kV line.

54. The split and re-termination of the Wescosville-Albertis 500 kV Transmission Line requires the installation of approximately 4 structures. These structures will be H-frame steel poles equipped with one steel cross arm. They will have an average height of 100 feet, and the average span length will be 626 feet. All poles will be installed on concrete foundations.

55. Three power conductors and one overhead ground wire will be installed. The power conductors will be twin bundled, 2,493 kcmil 54/37 stranding Aluminum Conductor Aluminum Alloy Reinforced (ACAR). The overhead ground wire will be 19 #9 alumoweld and will provide lightning protection for the re-terminated Lines.

56. Construction of part two of the Project is scheduled to begin by October 2012 to meet a required in-service date of March 2015. The construction of part two has been carefully coordinated with planned outages of the Susquehanna-Wescosville-Albertis 500 kV Transmission Line and the Unit 2 outage at the Susquehanna Steam

Electric Station nuclear plant in 2013 and 2015, respectively. The estimated cost of this part of the Project is \$1.1 million.

3. Construction of the Breinigsville-Wescosville Transmission Line

57. In part three of the Project, the new double-circuit Breinigsville-Wescosville Transmission Line will be constructed to connect the relocated portion of the AT&T Tap Line to the 69 kV yard at the proposed Breinigsville Substation.

58. The construction of the new Breinigsville Wescosville Transmission Lines will consist of the installation of 2 single-circuit poles with an average height of 75 feet. Three power conductors and one overhead ground wire will be installed on each circuit. The power conductors will be 556.5 kcmil 24/7 stranding ACSR. The overhead ground wire will 3/8-inch diameter high strength steel and will provide lightning protection for the new Transmission Lines.

59. Construction of the Breinigsville-Wescosville Transmission Line will be coordinated with the construction of the Breinigsville Substation and be completed by May 2015. The estimated cost of this part of the Project is \$350,000.

III. HEALTH AND SAFETY

60. The proposed Breinigsville Project will not create any unreasonable risk of danger to the public health or safety. The above-described transmission work for the Breinigsville Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electrical Safety Code (“NESC”) minimum standards and all applicable legal requirements. Descriptions of the NESC

standards, PPL Electric's design criteria, and PPL Electric's safety practices are provided in Attachment 4 to this Letter of Notification.

61. Attachment 5 accompanying this Letter of Notification explains PPL Electric's standards for Magnetic Field Management. As explained there, ground clearances for the relocated AT&T Tap Line, re-terminated Wescosville-Alburtis 500 kV Transmission Line, and new Breinigsville-Wescosville Transmission Line will be increased five feet higher than those required by the NESC standard in order to reduce the magnetic field exposure.

62. The relocated AT&T Tap Line will be a double circuit line and will be reversed phased to reduce magnetic fields. Similarly, the new Breinigsville-Wescosville Transmission Line will be a double circuit line and will be reverse phased. The re-terminated Wescosville- Alburtis 500 kV Transmission Line will be a single-circuit and cannot be reverse phased.

63. No communication towers, pipelines, or other utilities will be affected by the proposed Breinigsville Project.

64. The closest airport is the is the Allentown Municipal Airport, which is located approximately 10 miles northeast of the Project. Impacts to this airport are not expected. Nevertheless, PPL Electric will file the appropriate notifications with the PennDOT Bureau of Aviation and the Federal Aviation Administration to confirm that the proposed Lines will not be a hazard to flight operations at this airport.

IV. RIGHT-OF-WAY STATUS

65. PPL Electric does not require any additional right-of-way for the proposed Breinigsville Project.

66. The relocated AT&T Tap Line, re-terminated Wescosville-Alburtis 500 kV Transmission Line, and new Breinigsville-Wescosville Transmission Line will all be constructed entirely within the substation site for the Breinigsville Substation, which is owned by PPL Electric.

67. An aerial plot plan is provided at the end of Attachment 2 to this Letter of Notification. The plot plan depicts the location of the existing and proposed transmission facilities.

V. LAND USE AND ENVIRONMENTAL EVALUATION

68. As explained above, construction of the connecting transmission lines associated with the Breinigsville Substation will take place within the substation site for the Breinigsville Substation, which is owned by PPL Electric. The proposed Breinigsville Project will be constructed in Upper Macungie Township, Lehigh County. It is anticipated that the Breinigsville Project will have minimal incremental impacts on the area.

69. The closest residential community is located approximately 500 feet south of Long Lane. Although the proposed transmission lines may be visible to nearby property owners, visual impacts to existing and future homes in the area will be incremental because the existing Alburtis-Wescosville 500 kV and AT&T Tap Line presently occupy a portion of the property.

70. Some tree clearing may be required. If so, PPL Electric will apply its “Specifications for Initial Clearing and Control of Vegetation on or Adjacent to Electric Right-of-Way Through Use of Herbicides, Mechanical, and Hand Clearing Techniques” to mitigate any impacts.

71. The Project area contains no state lands, national parks, state parks, or local parks.

72. The Breinigsville Project will not traverse or affect any unique geological, scenic, or natural areas.

73. The Breinigsville Project will not affect any recreational areas or natural landmarks. The closest recreational areas include the Breinigsville Park located approximately 0.9 mile south of the Project and the Bob Rodale Cycling and Fitness Park located approximately 0.8 mile southeast of the Project. One Natural Area Inventory (NAI) site, the Jungle NAI, is located approximately 1 mile southeast of the Project. Based on the distances from the proposed Project, no impacts are expected to any recreational areas or natural areas.

74. The Project area was reviewed with the Pennsylvania Historical and Museum Commission (PHMC). PHMC determined that there is a probability of significant archaeological sites in the Project area. PPL conducted a Phase 1 survey and recovered approximately 6,000 artifacts on the site, and submitted the appropriate documentation to PHMC. PPL Electric will continue to consult with the PHMC and will comply with any further requests for investigations or surveys from the PHMC.

75. The PHMC indicated that no evaluation of historic buildings, structures, and/or archaeological resources is required for this Project. Nonetheless, if PPL Electric becomes aware of any previously unidentified resources that would be affected by the construction of the proposed Breinigsville Project, the PHMC will be contacted immediately.

76. PPL Electric conducted a wetland delineation of the Breinigsville Project area in October 2008. Three wetlands were observed within the Project area: two palustrine forested (PFO) wetlands (Wetlands A and B), and one palustrine emergent (PEM)/PFO wetland (Wetland C). PPL Electric will acquire all required environmental permits and adhere to all of their terms and conditions.

77. PPL Electric will obtain all necessary permits from Pennsylvania Department of Environmental Protection and the United States Corps of Engineers and will comply with all of the terms and conditions placed on those permits.

78. PPL Electric will acquire any required soil erosion and sedimentation control permits and will comply with any conditions placed on those permits.

79. PPL Electric has consulted with state and federal agencies to obtain information regarding endangered and threatened species in close proximity to the Project. Following a review of the Pennsylvania Natural Diversity Inventory, the Pennsylvania Game Commission (PGC), Pennsylvania Department of Conservation and Natural Resources (DCNR), and the U.S. Fish and Wildlife (USFWS) indicated that no impacts on any species are anticipated. However, because the project is located within the range of the federally threatened bog turtle (*Clemmys muhlenbergii*), PPL Electric conducted bog turtle phase I and phase II surveys of the Project area. However, no bog turtles were identified during the surveys. Therefore, the USFWS provided initial clearance in a letter dated February 3, 2010 and reconfirmed this clearance in a letter dated May 3, 2012.

80. The Pennsylvania Fish and Boat Commission (PFBC) September 24, 2008 response letter indicated that the state endangered Eastern Spadefoot toad (*Scaphiopus*

holbrookii) was known to exist in the vicinity of the Project. PPL Electric has conducted a survey of the Project Area for the Eastern Spadefoot toad. During the course of the survey, four Eastern Spadefoot toads were observed east of the Substation footprint B. Based on the results of the survey, PPL Electric coordinated with the PFBC to identify a 300-foot buffer area around the vernal pool, and adjusted the substation footprint accordingly to minimize encroachment into the buffer area. In conjunction with the PFBC, PPL Electric also developed a construction minimization plan. This plan, among other things, protects the two vernal pools and upland buffers through a deed restriction/land transfer. This plan also describes measures to conduct Eastern Spadefoot toad monitoring for a minimum of 5 years following construction. Provided these avoidance and minimization measures are followed, PFBC indicated in a letter dated May 22, 2012, that no adverse impacts to the Eastern Spadefoot toad population are identified.

VI. NOTICE

81. PPL Electric has provided information regarding the Breinigsville Project to representatives of the Upper Macungie Township and its respective planning commissions. PPL Electric also has provided information to the Board of Commissioners and Planning Commission for Lehigh County. These entities have not objected to the proposed Project.

82. 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).

83. PPL Electric is the only owner of property within the Project area. PPL Electric is fully aware of the proposed Project.

VII. LETTER OF NOTIFICATION

84. 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)(iv). The proposed Breinigsville Project qualifies for use of a Letter of Notification because the total collective length of the constructed, relocated, and re-terminated connecting transmission lines is less than two miles and because all of the lines will be constructed entirely within the PPL Electric-owned substation site for the Breinigsville Substation.

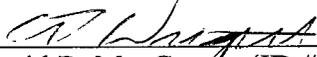
85. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the proposed Breinigsville Project will be constructed 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 Breinigsville Project in Upper Macungie Township, Lehigh County, Pennsylvania, that is explained above and in the Attachments hereto.

Respectfully submitted,

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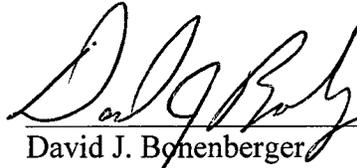
Date: July 29, 2012

Attorneys for PPL Electric Utilities Corporation

VERIFICATION

I, David J. Bonenberger, being the General Manager, 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: 6/25/12



David J. Bonenberger