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SECRETARY'S BUREAU

July 19, 2012

BY HAND

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: Joint Petition of PPL Electric Utilities Corporation for Waiver of Certain Provisions of the Pennsylvania Public Utility Commission's Regulations at 52 Pa. Code § 57.71 et seq., and Letter of Notification of PPL Electric Utilities Corporation, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval of the Siting and Construction the Paupack-Honesdale #1 & #2 138/69 kV Transmission Line in Paupack Township, Palmyra Township, and Cherry Ridge Township, Wayne County, Pennsylvania - Docket No. A-2012-

Dear Secretary Chiavetta:

Enclosed, for filing, are an original and six (6) copies of the Joint Petition for Waiver and Letter of Notification of PPL Electric Utilities Corporation, together with seven (7) copies of the accompanying attachments which are contained in a separately-bound volume in the above-referenced proceeding. Also enclosed is a CD containing copies of the Joint Petition for Waiver and Letter of Notification and attachments.

As indicated on the certificate of service, copies of the Joint Petition for Waiver Letter of Notification and accompanying exhibits and appendices are being served by certified mail, return receipt requested upon the property owners and the involved governmental agencies and municipalities.

Construction is scheduled to commence as soon as practical following approval by the Pennsylvania Public Utility Commission to meet a required in-service date of November 2014.

Rosemary Chiavetta, Secretary

July 19, 2012

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If you have any questions concerning this matter, please contact me at the address or telephone numbers provided above.

Respectfully Submitted,



Christopher T. Wright

CTW/jl

Enclosures

cc: Robert F. Young
Paul T. Diskin
Nicholas Okoro
Kimberly Hafner
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of PPL Electric Utilities :
Corporation for Waiver of Certain :
Provisions of the Pennsylvania Public : Docket No. _____
Utility Commission's Regulations at 52 :
Pa. Code § 57.71 *et seq.*, and Letter of :
Notification of PPL Electric Utilities :
Corporation, Filed Pursuant to 52 Pa. :
Code Chapter 57 Subchapter G, for :
Approval of the Siting and :
Construction the Paupack-Honesdale :
#1 & #2 138/69 kV Transmission Line :
in Paupack Township, Palmyra :
Township, and Cherry Ridge :
Township, Wayne County, :
Pennsylvania. :

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SECRETARY'S BUREAU

**JOINT PETITION FOR WAIVER AND
LETTER OF NOTIFICATION**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric"), hereby files this Petition for Waiver, pursuant to 52 Pa Code §§ 5.43 and 57.72(e), for a waiver of certain of the Pennsylvania Public Utility Commission's ("Commission") regulations governing the review and approval of the siting and construction of high voltage electric transmission lines set forth at 52 Pa. Code §§ 57.71 *et seq.*, together with this Letter of Notification to request that the Commission approve the siting and construction of the proposed Paupack-Honesdale #1 & #2 138/69 kV Transmission Line ("Paupack-Honesdale Transmission Line") pursuant to 52 Pa. Code § 57.72(d). This Project is the third of three

separate but related transmission line Projects to reinforce the 69 kV transmission systems in Lackawanna and Wayne Counties, Pennsylvania.

The proposed Paupack-Honesdale Transmission Line will consist of approximately 6.9 miles of existing single-circuit 138/69 kV line that will be reconstructed for double-circuit operation within the existing right-of-way. The proposed Line also will consist of approximately 0.5 miles of new double-circuit 138/69 kV line that will be constructed using new right-of-way to connect the Line to the Paupack 230-69 kV Substation.¹ Collectively, these line segments make up the proposed Paupack-Honesdale Transmission Line to be constructed in Paupack, Palmyra, and Cherry Ridge Townships, Wayne County. PPL Electric has provided information regarding this Project to these political subdivisions, and none of them have objected to the Project. Subject to the Commission's approval, construction of this Project is scheduled to begin in Spring 2013, to support an in-service date of November 2014. In support thereof, PPL Electric states as follows:

I. INTRODUCTION

1. This Joint Petition for Waiver and 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:

¹ On June 11, 2012, PPL Electric submitted a Zoning Petition, at Docket No. P-2012-2309302, for a finding that will exempt the control equipment building at the proposed Paupack 230-69 kV Substation from the Paupack Township Zoning Ordinance.

PPL Electric Utilities Corporation
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 Joint Petition for Waiver and 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 undertake three separate transmission projects to resolve violations of PPL Electric's "Reliability Principles & Practices" ("RP&P") guidelines and reinforce the 69 kV systems in Lackawanna and Wayne Counties. Each transmission line Project has been the subject of a separate filing.²

7. The Letter of Notification for the first transmission line Project was filed first to coordinate the construction of the Peckville-Varden 69 kV Line with the construction schedule of the previously approved Susquehanna-Roseland 500 kV line a portion of which will parallel the Peckville-Varden 69 kV Line.

8. The Letter of Notification for the second transmission line Project was filed to coordinate the construction of the proposed Paupack 230-69 kV Substation with the expected outage of the existing Peckville-Blooming Grove 230 kV Line due to its reconstruction for the Susquehanna-Roseland 500 kV Project. PPL Electric herein seeks

² 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. The Letter of Notification for this Project was filed first because the expected construction time for it is substantially longer than the anticipated construction time for the other two related Projects. The Letter of Notification for the 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 will parallel the rebuilt Peckville-Honesdale 138/69 kV Line.

On June 11, 2012, PPL Electric filed a Letter of Notification for the second transmission line project, at Docket No. A-2012-2309315, which is currently pending before the PUC. Therein, PPL Electric seeks Commission approval of the construction of two single circuit 230 kV lines each 0.9 miles in length, the Peckville – Paupack 230 kV Line and the Paupack – Blooming Grove 230 kV Lines, to supply power to the proposed Paupack 230-69 kV Substation. The new 230 kV Lines will intersect the existing Peckville – Blooming Grove 230 kV Transmission Line and continue south to provide a power source to the newly proposed Paupack 230-69 kV Substation. Those new Lines and Substation also are needed to resolve the violation of PPL Electric's RP&P described herein. The Letter of Notification for the second transmission line Project was filed to coordinate with the construction schedule of the Paupack 230-69 kV Substation.

Commission approval of the third transmission line Project as the final phase of the plan to reinforcement of the 69 kV transmission systems in Lackawanna and Wayne counties.

9. This Joint Petition for Waiver and 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 List of Owners of Property within the Right-of-Way
- Attachment 7 List of Involved Governmental Agencies, Municipalities, and Other Public Entities.

10. This Joint Petition for Waiver and 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. LETTER OF NOTIFICATION

A. THE PROJECT

1. Overview

11. PPL Electric proposes to reconstruct 2.9 miles of the existing single-circuit Lakeville 138/69 kV Tap Line and 4.0 miles of the existing single-circuit Blooming Grove-Honesdale 138/69 kV Transmission Line for double circuit 138/69 kV operation (hereinafter, these reconstructed lines will be referred to as the “Reconstructed Line Segment”). PPL Electric also proposes to connect the Reconstructed Line Segment

to the Paupack 230-69 kV Substation³ by constructing 0.5 miles of new double circuit 138/69 kV line (hereinafter, “Connecting Line Segment”). The total Project length is 7.4 miles. Collectively, these line segments will make up the proposed double-circuit Paupack-Honesdale Transmission Line.

12. The proposed Paupack-Honesdale Transmission Line, together with the Paupack Substation and the other two separate but related transmission line Projects, will resolve violations of PPL Electric’s RP&P guidelines and improve reliability and increase operating flexibility of the 69 kV systems in Lackawanna and Wayne Counties.

2. Need for the Project

13. Through a regional transmission system planning process and PPL Electric’s planning guidelines, PPL Electric identifies facilities that require reinforcement to enable it to continue to provide adequate and reliable service to the public and plan appropriate measures to assure reasonably continuous supply to the entire regional load, even during adverse conditions. A further description of PPL Electric’s system planning process is provided in Attachment 1 to this Letter of Notification.

14. The Necessity Statement for the Line is provided as Attachment 1 accompanying this Letter of Notification. As explained in greater detail therein, the purpose of the Project is to resolve violations of reliability criteria, to improve reliability, and to increase operating flexibility of PPL Electric’s 69 kV system in Lackawanna and Wayne Counties.

³ The need for the Paupack 230-69 kV Substation is explained in the Letter of Notification for the second transmission line Project filed with the Commission on June 11, 2012, at Docket No. A-2012-2309315. PPL Electric also submitted a Zoning Petition, at Docket No. P-2012- 2309302, for a finding that will exempt the control equipment building at the proposed Paupack 230-69 kV Substation from the Paupack Township Zoning Ordinance.

a. Existing System

15. 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.

16. The Blooming Grove-West Damascus 69 kV Line, including the related taps, is 38 miles in length.⁴ 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.

17. The Peckville-Varden 69 kV Line, including the related taps, is approximately 24 miles in length.⁵ 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 1920s and is an insufficient electrical tie due to the small-sized conductor (#2/0 copperweld copper) and its length.

18. 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,

⁴ With its related taps, the Blooming Grove-West Damascus 69 kV Line runs from (1) the Blooming Grove 69-12 kV Substation to the Kimbles 69-12 kV Substation, where it shares the line route and double-circuit 69 kV structures with the Blooming Grove-Honesdale 69 kV Line; (2) then from the Kimbles 69-12 kV Substation to the Honesdale 69-12 kV Substation, with a normally open (sectionalizing) point located at the Honesdale Substation; and (3) then from the Honesdale 69-12 kV Substation to the West Damascus 69-12 kV Substation. See Figure 1 of Attachment 1 to this Letter of Notification.

⁵ The Peckville-Varden 69 kV Line runs from the Peckville 69-12 kV Substation to the Varden 69 kV Tap Line, with a normally open (sectionalizing) point located at the Varden 69 kV Tap Line. See Figure 1 of Attachment 1 to this Letter of Notification.

the Peckville-Varden 69 kV Line is an insufficient electrical tie due to its small-sized conductor (#2/0 copperweld copper).

b. Single-Circuit Contingency

19. Studies conducted for PPL Electric's transmission system revealed that, under winter peak conditions with all generation at Wallenpaupack out of service, by 2014 an outage of the single-circuit Blooming Grove-West Damascus 69 kV Line occurring near the Blooming Grove 69-12 kV Substation, *i.e.*, a single circuit outage, would interrupt 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 to be interrupted until manual sectionalizing can be performed.

20. *Further, if there were an outage of the Blooming Grove-West Damascus 69 kV circuit, only the Honesdale 69-12 kV Substation load could be transferred 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.*⁶

21. In addition, an outage of the Blooming Grove-West Damascus 69 kV Line would cause the customer load served by the Tennessee Gas distribution substation (customer-owned), Indian Orchard distribution substation, West Damascus distribution substation, and Bohemia distribution substation to remain interrupted in order for the

⁶ Transmission lines have a maximum rated thermal capacity, which is the maximum electrical current they can safely carry. When a transmission line overloads, the conductor, the hardware securing the conductor, and the line terminal equipment begin to overheat. Overloading transmission lines may cause permanent damage to transmission infrastructure and substantial and prolonged power outages.

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.

22. 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 have been completed, 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.

c. Double-Circuit Contingency

23. In addition, this Project, together with the previously filed second transmission line Project, also will resolve the reliability double-circuit contingency violations described below.

24. Studies conducted for PPL Electric's transmission system revealed that, under winter peak with all generation at Wallenpaupack out of service, by 2014 an outage of both the Blooming Grove-West Damascus and Blooming Grove-Honesdale 69 kV lines, *i.e.*, a double-circuit outage, occurring near the Blooming Grove Substation, would interrupt 133 MW of load.⁷ 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 of load to be interrupted until manual sectionalizing can be performed.

⁷ 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.

25. In addition, the double-circuit outage of the Blooming Grove-West Damascus and Blooming Grove-Honesdale 69 kV single circuit lines would require load served by the Tennessee Gas distribution substation (customer-owned), Bohemia distribution substation, Kimbles distribution substation, and Tafton distribution substation to remain interrupted in order for the Power Dispatcher to restore 69 kV voltage along the line to the acceptable lower limit. Indeed, only 65 MW of the total 133 MW could be restored with voltage remaining within acceptable levels at the local 69 kV substation buses. Therefore, such an 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 to be interrupted until overhead line repairs can be completed. In general, the amount of time to repair a damaged overhead transmission line might extend through one work day or longer.

26. Further, under winter peak conditions with all generation at Wallenpaupack out of service, by 2014 the projected loading on the Blooming Grove-West Damascus 69 kV Line will be 72 MW. This loading would violate 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.

27. After completion of this Project, together with the previously filed second transmission 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 interrupt no load for an extended period of time after switching is completed.

3. The Proposed Project

28. As explained in the Letter of Notification for the second transmission line Project filed with the Commission on June 11, 2012, at Docket No. A-2012-2309315, PPL Electric proposes to build the new Paupack Substation along SR 3031 in northwestern Paupack Township, Wayne County. The new Paupack Substation will be located near the Lakeville Tap between the Blooming Grove and Peckville Substations, which is 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 resectionalizing. 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.

29. The new Paupack Substation will be connected to the existing 138/69 kV transmission systems by building the proposed double circuit Paupack-Honesdale Transmission Line. The proposed Paupack-Honesdale Transmission Line consists of three segments that are summarized below. The Aerial Exhibit at the end of Attachment 2 to this Letter of Notification depicts the location of these facilities.

30. The proposed Paupack-Honesdale Transmission Line will be connected to the Paupack 230-69 kV Substation by construction of the new double circuit 138/69 kV Connecting Line. The new Connecting Line will extend 0.5 miles from the Paupack 230-69 kV Substation to the Lakeville 138/69 kV Tap where it will tie into the Lakeville

138/69 kV Tap. Approximately 0.2 miles of the Connecting Line will be constructed within the PPL Electric-owned site for the Paupack 230-69 kV Substation. The remaining 0.3 miles will be constructed within a new right-of-way previously acquired by PPL Electric. The proposed Connecting Line will consist of approximately 4 single-shaft steel pole tangent structures equipped with upswept arms, and approximately 4 angle structures that may consist of single or two-pole structures depending on the severity of the angle.

31. The existing single-circuit Lakeville 138/69 kV Tap will be reconstructed for double-circuit 138/69 kV operation. The reconstructed section of the Lakeville 138/69 kV Tap will extend 2.9 miles from its Tap point on the existing Blooming Grove-Honesdale 138/69 kV Transmission Line to a point at which it will tie into the Connecting Line described above. The Lakeville 138/69 kV Tap will be constructed entirely within the existing right-of-way. The existing Lakeville 138/69 kV Tap is supported by 61 poles with an average height of approximately 70 feet and an average span of 263 feet. The proposed rebuilt transmission Line will consist of approximately 39 single-shaft steel pole tangent structures equipped with upswept arms, and approximately 3 angle structures that may consist of single or two pole structures, depending on the severity of the angle.

32. The existing single-circuit Blooming Grove-Honesdale 138/69 kV Transmission Line will be reconstructed for double-circuit 138/69 kV operation. The reconstructed section of the Blooming Grove-Honesdale 138/69 kV Transmission Line will extend approximately 4.0 miles from the Lakeville Tap pole, where it will tie into the reconstructed Lakeville 138/69 kV Tap described above, to the Varden 138/69 kV Tap.

The existing Blooming Grove-Honesdale 138/69 kV Transmission Line is supported by 79 poles with an average height of approximately 70 feet and an average span of 263 feet. The proposed rebuilt transmission Line will consist of approximately 38 single-shaft steel pole tangent structures equipped with upswept arms, and approximately 17 angle structures that may consist of single or two pole structures, depending on the severity of the angle.

33. Collectively, the three transmission line segments will make up the proposed Paupack-Honesdale Transmission Line.

34. The proposed Paupack-Honesdale kV Transmission Line will be designed and constructed for future 138 kV double circuit operation, but initially will be operated as a double circuit 69 kV until load growth in the area makes it appropriate to increase the operating voltage.

35. The proposed double-circuit Paupack-Honesdale Transmission Line will utilize six 556 kcmil,⁸ 24/7 stranding, ACSR⁹ conductors and one 48 count optical ground wire for lightning protection and communication between circuit breakers that remove the line from service should a fault in the line be detected.

36. This Project requires the installation of approximately 106 poles, which reflects approximately a 33 percent decrease in the total number of poles. The proposed single-shaft steel poles will average approximately 83 feet tall and the average span length will be approximately 386 feet.

⁸ 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 mm².

⁹ Aluminum conductor steel reinforced.

37. The total estimated cost for the proposed Line is approximately \$7.8 million.

38. Subject to the Commission's approval, construction of this Project is scheduled to begin in Spring 2013, to support a required in-service date of November 2014. The required in-service date is defined by PPL Electric as the date the proposed facility needs 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. The Engineering Description of the proposed Paupack-Honesdale Transmission Line is provided in Attachment 2 accompanying this Letter of Notification.

B. HEALTH AND SAFETY

40. The proposed Lines will not create any unreasonable risk of danger to the public health or safety. The proposed Lines 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.

41. Attachment 5 accompanying this Letter of Notification explains PPL Electric's standards for Magnetic Field Management. Pursuant thereto, ground clearances for the proposed Lines will be increased five feet higher than those required by the NESC standard in order to reduce the magnetic field exposure. The proposed Paupack-Honesdale Transmission Line will be constructed for double circuit operation, which will allow for reverse phasing. A reduction in magnetic field exposure is anticipated due to the higher ground clearances and reverse phasing.

42. No communication towers, pipelines, or other utilities will be affected by the proposed Paupack-Honesdale 138/69 kV Transmission Line.

43. The closest airport is the Cherry Ridge Airport, which is a public airport located approximately .025 miles from the northern-most portion of the proposed Paupack-Honesdale 138/69 kV Transmission Line. Impacts to this airport are not expected due the location of the Project in relation to the orientation of the runways and the fact that electrical structures located near the project site are taller than those proposed herein. 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 these airports.

C. RIGHT-OF-WAY STATUS

44. The proposed rebuild of the Reconstructed Line Segment will be entirely within the existing rights-of-way. The existing rights-of-way are sufficient to accommodate the reconstructed transmission lines without the need for additional right-of-way. Therefore, no additional rights-of-way are required for the Reconstructed Line Segment of the Project.

45. Approximately 0.2 miles of the Connecting Line will be constructed within the PPL Electric-owned site for the Paupack 230-69 kV Substation. The remaining 0.3 miles will be constructed within a new right-of-way previously acquired by PPL Electric. Therefore, no additional rights-of-way are required for the construction of the Connecting Line segment of the proposed Paupack-Honesdale 138/69 kV Transmission Line.

46. 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 transmission facilities for this Project.

D. LAND USE AND ENVIRONMENTAL EVALUATION

47. As explained above, construction of the proposed Line will take place entirely within existing rights-of-way, a right-of-way previously acquired by PPL Electric, and on PPL Electric fee-owned property, as depicted in the aerial plot plan at the end of Attachment 2 to this Letter of Notification. It is anticipated that the proposed Paupack-Honesdale Transmission Line will have minimal incremental impacts on the area.

48. The proposed Paupack-Honesdale Transmission Line will be constructed in Cherry Ridge, Palmyra, and Paupack Townships, Wayne County.

49. Land use in the Project area ranges from forest and croplands to commercial and residential development. Land use impacts as a result of the Project are anticipated to be minimal. With the exception of the 0.5 mile long Connecting Line, the Paupack-Honesdale Transmission Line will be located within existing PPL Electric-owned rights-of-way. The Project is also located in areas that contain existing PPL Electric facilities that will be upgraded. Interference with existing land uses will be further minimized because, where practical, PPL Electric will use previously established access roads for construction.

50. The previously acquired right-of-way for the 0.5 mile Connecting Line is almost entirely forested,¹⁰ and some tree clearing along the right-of-way will be required.

¹⁰ The only deviation from forested land is the northern end the Connecting Line where it will connect with the existing Lakeville 138/69 kV Tap. At this point, the Connecting Line is within an existing transmission

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.

51. The Project area and Wayne County as a whole have significant agricultural land, including pastures, croplands, and open brush areas that are used to produce feeds or raise farm animals. The proposed Paupack-Honesdale 138/69 kV Transmission Line is not anticipated to have any effect on these lands because the reconstructed segments of the Line will be built within the existing right-of-way in these areas, which generally parallels the edges of these properties, and will use strategic pole placement locations to span across active use areas.

52. There are no state lands, national parks, state parks, or local parks within the Project area.

53. The Project area was reviewed with the Pennsylvania Historical and Museum Commission (PHMC). There were no listed or eligible National Register of Historic Places within 0.5-miles of the Project right-of-way. The PHMC indicated in its October 26, 2011 letter that no further actions are required from a historical or archaeological perspective. If PPL Electric becomes aware of any previously unidentified resources that would be affected by the construction of the proposed Paupack-Honesdale Transmission Line, the PHMC will be contacted immediately.

54. The Project will not affect any unique geological, scenic, or natural areas as these areas will not be crossed.

line right-of-way, which is categorized as pasture/brush and which has been previously cleared for the existing line.

55. The proposed Paupack-Honesdale Transmission Line will make eight crossings over seven streams as it extends from the Paupack Substation to the Varden Tap pole. However, the proposed Paupack-Honesdale Transmission Line will cross these streams in the same location as the existing transmission line sections to be reconstructed. Further, reconstruction activities will be conducted using an approved erosion and sedimentation control plan to minimize the effects of stormwater runoff. No permanent impacts to local stream networks are anticipated.

56. The proposed Paupack-Honesdale Transmission Line will traverse a few wetland systems and fresh water ponds as it extends from the Paupack Substation north to the Varden Tap pole. Identification and delineation of wetlands and watercourses within the Project right-of-way will take place before determining structure locations. PPL Electric will obtain all necessary permits from the 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.

57. The proposed Paupack-Honesdale Transmission Line will traverse minor portions of the 100-year floodplain area of Middle Creek. Placement of structures in the floodplain areas will be avoided to the extent practical. If floodplain impacts cannot be avoided, PPL Electric will coordinate with Federal Emergency Management Agency and the Pennsylvania Department of Environmental Protection. PPL Electric will obtain all necessary permits and will comply with all of the terms and conditions placed on those permits.

58. The Nature Conservancy's *Wayne County Natural Areas Inventory* identified two natural sites in the vicinity of the Project right-of-way. The first site is the

Heron Rookery Natural Area, which is located about 1.3 miles to the west of the right-of-way at the Paupack Substation in Paupack Township. The second site is the Hawley Bog, which is located about 1.9 miles northeast of the Project right-of-way in Palmyra Township. Neither of these natural areas will be directly affected by the proposed Paupack-Honesdale 138/69 kV Transmission Line.

59. The Nature Conservancy's *Pike County Natural Areas Inventory* identified one natural site within the vicinity of the Project right-of-way. The identified site is the Lake Wallenpaupack Natural Area, which is located approximately 1.1 southeast of the Project right-of-way along the border among Paupack Township, Wayne County and Palmyra Township, Pike County. This natural area will not be directly affected by the proposed Paupack-Honesdale 138/69 kV Transmission Line.

60. PPL Electric has consulted with state and federal agencies to obtain information regarding endangered and threatened species in close proximity to the Project. A review of the Pennsylvania Natural Diversity Inventory records under the jurisdiction of the Department of Conservation and Natural Resources, the Pennsylvania Fish and Boat Commission, and the Pennsylvania Game Commission, U.S. Fish and Wildlife Service has been completed. The Pennsylvania Fish and Boat Commission, Pennsylvania Game Commission, and Pennsylvania Department of Conservation and Natural Resources indicated that there are no known species of concern under their jurisdiction within the study area. The United States Fish and Wildlife Service noted the potential presence of the federally listed Indiana Bat (*Myotis sodalis*) but added that the Project is unlikely to adversely affect the Indiana bat population. The United States Fish and Wildlife Service also mentioned that avian species protected under the Migratory

Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act may use the Project area for wintering, migrating, or breeding activities. PPL Electric will review the National Bald Eagle Management Guidelines and the Avian Power Line Interaction Committee guidelines and implement protective measures as practicable.

E. NOTICE

61. PPL Electric has provided information regarding the Project to representatives of Cherry Ridge, Palmyra, and Paupack Townships, and their respective planning commissions. PPL Electric also has provided information to the Board of Commissioners and Planning Commission for Wayne County. These entities have not objected to the proposed Line.

62. 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).

63. All owners of property within the right-of-way for the proposed Paupacke-Honesdale 138/69 kV Transmission Line are listed in Attachment 6. The landowners listed in Attachment 6, who own property within the right-of-way were notified by PPL Electric representatives and sent a letter summarizing the construction of these line sections. Owners of land in the vicinity of the Project were invited to attend several open houses on this Project and on related filings. Further, copies of this Letter of Notification will be served on the landowners listed in Attachment 6.

III. PETITION FOR WAIVER

A. OVERVIEW

64. The purpose of the Petition for Waiver, as explained more fully below, is to obtain from the Commission such waivers as are necessary or appropriate to permit PPL Electric to proceed by means of this Letter of Notification for the siting and construction of the proposed Paupack-Honesdale 138/69 kV Transmission Line. Use of a Letter of Notification will permit PPL Electric to complete the filings required for approval in a much shorter period of time than the time that would be required to prepare a complete siting Application for the proposed Paupack-Honesdale Transmission Line. Regulatory review in a shorter period of time will enable PPL Electric to complete construction of the proposed Paupack-Honesdale Transmission Line and maintain the construction and in-service dates for all three of the separate but related transmission line Projects that are required to reinforce the 69 kV systems in Lackawanna and Wayne Counties.

65. The total Project length is 7.4 miles. The proposed Project can be separated into two distinct components.

66. The first component of the Project is the reconstruction of 2.9 miles of the existing single-circuit Lakeville 138/69 kV Tap Line and 4.0 miles of the existing single-circuit Blooming Grove-Honesdale 138/69 kV Transmission Line for double circuit 138/69 kV operation. The proposed Reconstructed Line Segment will be entirely within the existing rights-of-way.

67. The second component of the Project is the construction of the Connecting Line that will extend 0.5 miles to connect the proposed Paupack-Honesdale Transmission Line to the Paupack 230-69 kV Substation. Approximately 0.2 miles of the Connecting

Line will be constructed within the PPL Electric-owned site for the Paupack 230-69 kV Substation. The remaining 0.3 miles will be constructed within a new right-of-way previously acquired by PPL Electric.

68. In the negotiations for the acquisition of the land for the Paupack 230-69 kV Substation and the right-of-way for the Connecting Line, the landowners were informed of the purpose of the acquisitions, but they expressed no objection to the Project.

69. The tracts of land on which the Connecting Line and the Paupack 230-69 kV Substation will be constructed are large. To acquire the needed property rights, it was necessary for PPL Electric to contact only ___ landowners. Few landowners will be affected by the Substation and the Connecting Line.

70. Because approximately 6.9 miles of the Project will be constructed entirely within existing right-of-way with an existing transmission line and only approximately 0.5 miles of the Project will be constructed within right-of-way or land purchased recently by PPL Electric for this Project, the most practical and efficient method to obtain Commission review and approval for the siting of the proposed Paupack-Honesdale Transmission Line is a Letter of Notification under 52 Pa. Code Pa. Code § 57.72(d) rather than a full Application under 52 Pa Code §§ 57.71(a)-(c). Preparation of a full Application requires the completion of numerous studies, reports, maps and diagrams that are not required to prepare a Letter of Notification.

71. The Commission's regulation at 52 Pa. Code § 57.72(d) sets forth the circumstances under which an electric public utility may seek Commission approval for

the siting and construction of a proposed high voltage transmission line by means of a Letter of Notification instead of a full Application as follows:

(d) Letter of notification in lieu of Application:

(1) A Letter of Notification may be filed with the commission in lieu of the Application process set forth in §§ 57.71 – 57.76 for the following:

(i) An HV line which is proposed to be located entirely on an existing transmission line right-of-way, so long as the size, character design, or configuration of the proposed HV line does not substantially alter the right-of-way.

(ii) An HV line which is proposed to be located entirely within a public road.

(iii) An HV line which is proposed to be located entirely within the applicant's existing transmission line right-of-way and the property of the sole customer to be served by the line, so long as the size, character, design, or configuration of the proposed line does not substantially alter the right-of-way.

(iv) A line for which the voltage is proposed to be increased above its present levels, so long as the size, character, design or configuration of the proposed line does not substantially alter the right-of-way.

(v) An HV line which is to be reconducted or reconstructed so long as the size, character, design or configuration of the proposed line does not substantially alter the right-of-way.

(vi) An HV line having a proposed route of 2 miles or less.

52 Pa Code § 57.72 (d).

72. As proposed, the Paupack-Honesdale Transmission Line does not meet the strict definition of any one of the circumstances in which a Letter of Notification may be used, as set forth above. The proposed Paupack-Honesdale Transmission Line, however, nearly fits within several of the circumstances in which a Letter of Notification may be used in lieu of an Application. PPL Electric is requesting a waiver of the strict Application of the aforementioned regulations to allow PPL Electric to file a Letter of

Notification in lieu of an Application for Commission review and approval to site and construct the proposed Paupack-Honesdale Transmission Line.

73. The Commission's Rules of Administrative Practice and Procedure at 52 Pa. Code § 5.43 allow for petitions for waiver of any of the Commission's regulations. More specifically, the Commission's transmission line siting regulations at 52 Pa. Code § 57.72(e) specifically permit petitions to request that portions of these specific siting regulations be waived. It states:

(e) The Commission or the presiding officer may — upon the petition of any party, upon the Commission's own motion, or upon the presiding officer's own motion — waive one or more or all of the requirements in this subchapter. The petition shall clearly state the requirements sought to be waived and the reasons therefor.

52 Pa. Code § 57.72(e).

74. PPL Electric respectfully requests a waiver of the strict Application of 52 Pa Code §57.72(d)(1) to permit PPL Electric to seek approval of the siting and construction of Paupack-Honesdale Transmission Line, which is one of three separate but related transmission Projects needed to resolve violations of PPL Electric's RP&P guidelines and reinforce the 69 kV systems in Lackawanna and Wayne Counties.

B. WAIVER

75. Letters of Notification are permitted if the proposed transmission line to be "reconducted or reconstructed so long as the size, character, design or configuration of the proposed line does not substantially alter the right-of-way." 52 Pa. Code § 57.72(d)(1)(v). Here, the 6.9 miles of the Reconstructed Line Segment of the proposed Paupack-Honesdale Transmission Line will be reconstructed entirely within the existing rights-of-way for the Lakeville 138/69 kV Tap Line and Blooming Grove-Honesdale

138/69 kV Transmission Line. A portion of the 0.5 mile Connecting Line will be constructed within a new right-of-way and on a tract of land recently acquired by PPL Electric. The only issue is whether the proposed transmission line will “substantially alter the right-of-way.” Although the meaning of this phrase is uncertain, PPL Electric believes that the reconstructed segments of the proposed Paupack-Honesdale Transmission Line will not have significant incremental impacts on the existing rights-of-way.

(a) The existing rights-of-way and easements for the Reconstructed Line Segment provide the necessary property rights to reconstruct the Line and switch structures in the Line.

(b) The existing right-of-way for the Reconstructed Line Segment allows the reconstruction and reconductoring without the need for additional right-of-way. The existing right-of-way varies in width from 70 feet to 100 feet wide and sufficient to accommodate and rebuild the line.

(c) The additional right-of-way needed for the Connecting Line is in place. Approximately 0.2 miles of the Connecting Line will be constructed within the PPL Electric-owned site for the Paupack 230-69 kV Substation. The remaining 0.3 miles will be constructed within a new right-of-way already acquired by PPL Electric.

(d) Except for the Connecting Lines, vegetation has been or will be cleared to reduce vegetation-related power outages and, therefore, the impacts to vegetation on the right-of-way will be minimized at the time of reconstruction. The previously acquired right-of-way for the 0.5 mile Connecting Line is almost entirely forested and some tree clearing along the right-of-way will be required. 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.

(e) Altogether, this Project require the installation of approximately 107 poles, which reflects a 33 percent decrease in the total number of transmission poles along the existing sections the Reconstructed Line Segment. The proposed single-shaft steel poles will average approximately 83 feet in height and the average span length will be approximately 386 feet.

(f) Although the new steel mono-poles will have a greater average height than the existing wood structures, some existing locations may not be used due to PPL Electric’s ability to construct longer spans. No new poles will be placed on property where there were previously no poles, and except for the Connecting Line, no property will have a greater number of poles on it than are on it presently.

76. The Commission’s regulations permit use of a Letter of Notification if the length of a proposed transmission line is two miles or less. 52 Pa. Code § 57.72(d)(1)(vi). The Connecting Line will extend 0.5 miles to connect the proposed Paupack-Honesdale Transmission Line to the Paupack 230-69 kV Substation. Approximately 0.2 miles of the Connecting Line will be constructed within the PPL Electric-owned site for the Paupack 230-69 kV Substation, which PPL Electric has already acquired. The remaining 0.3 miles will be constructed within a new right-of-way already acquired by PPL Electric. Therefore, only 0.3 miles of the Project will be built within new right-of-way. This segment of the Project is less than two miles.

77. The Commission has approved similar requests granting waivers of certain regulations regarding Commission Review of Siting and Construction of Electric Transmission Lines at 52 Pa Code § 57.71 *et seq.*

(a) In *Letter of Notification of West Penn Power Company filed pursuant to 52 Pa. Code Chapter 57 with respect to reconstruction and relocation of the Allegheny Ludlum No. 2 138 kV Transmission Line in the City of Lower Burrell, Westmoreland County, Pennsylvania*, Docket No. A-2012-2281399 (March 1, 2012), the Commission approved a Letter of Notification for the construction of a 2.7 mile transmission line project proposed by West Penn Power Company. The project involved a 2.34 mile section of line that would be reconstructed within existing rights-of-way. The project also involved a new 0.32 mile section that required a new right-of-way. In approving the Letter of Notification, the Commission found: (1) no party intervened to object to the filing or assert there was a substantial alteration to any of the right of ways; (2) no pole locations will be changed in the reconstructed portion of the line, and no new poles will be placed on property where there were previously no poles, except the new 0.32 mile portion of the line; (3) the existing center line right-of-way allows the reconstruction and reconductoring without the need for additional right-of-way; (4) the additional rights-of-way needed for the new 0.32 mile portion of the line are in place; and (5) there will be little or no change in the footprint of the poles. Based on these findings, the Commission held that the Letter of Notification met the requirements of 52 Pa. Code § 57.72(d)(1)(v) and (vi) because a portion of the line is an HV line which is to be recondored or reconstructed and, a separate portion being relocated is less than two miles in length.

(b) In *Petition for Waiver of Certain Provisions of the Pennsylvania Public Utility Commission's Regulations for Commission Review of Siting and Construction of Electric Transmission Lines set forth at 52 Pa. Code § 57.71 et seq.*, Docket No. P-2008-2037618 (June 27, 2008), the Commission approved Penelec's request for a waiver from Section 57.72(d) of the Commission's siting regulations. Penelec proposed to connect a new ethanol plant to the grid by extending a 115 kV transmission line. The total length of the project was 3.9 miles. The route for the extension would follow an existing 34.5 kV circuit for approximately 3.1 miles, after which it would require construction of 0.3 miles in new right-of-way and an additional 0.5 miles of new construction located on the ethanol plant property. The project also required 10 to 15 feet of additional rights-of-way on both sides of the existing circuit. The Commission noted that most of the line extension in question was located on an existing right-of-way of a 34.5 kV line and across the property of the sole customer being served by the line. The Commission further noted that, for the most part, the extension is a rebuild of an existing line, and was not significantly longer than the two-mile standard at § 57.72(d)(1)(vi). The Commission therefore approved Penelec's request for a waiver and ordered Penelec to file a Letter of Notification.

78. If the Commission approves the waiver request, this Joint Petition for Waiver and Letter of Notification may be used for the proposed Paupack-Honesdale Transmission Line instead of a full application. All of the information necessary for the Commission to decide whether to approve the siting and construction of the proposed Paupack-Honesdale Transmission Line is included in the attachments hereto.

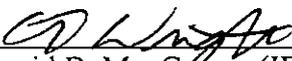
79. For the reasons provided above, PPL Electric requests that the Commission approve this waiver request and accept this Joint Petition for Waiver and Letter of Notification requesting approval to site and reconstruct the proposed Paupack-Honesdale 138/69 kV Transmission Line.

IV. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission grant the request for a waiver and approve the siting and construction of the proposed Paupack-Honesdale #1 & #2 138/69 kV Transmission Line to be constructed in Paupack, Palmyra, and Cherry Ridge Townships, Wayne County, that is explained above and in the Attachments hereto.

Respectfully submitted,

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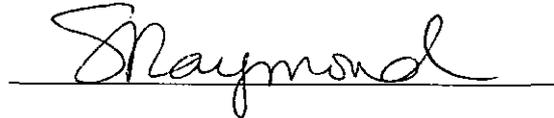
Date: July 19, 2012

Attorneys for PPL Electric Utilities Corporation

VERIFICATION

I, Stephanie Raymond , 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: 7/17/12



Stephanie Raymond

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SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition for Waiver and Letter of Notification 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

Bureau of Investigation & Enforcement
PO Box 3265
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265

Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Office of Small Business Advocate
Commerce Building
300 North Second Street, Suite 1102
Harrisburg, PA 17101

Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0053
Attn: Mr. Douglas C. McLearn, Chief

Honorable Barry Schoch, P.E., Secretary
Pennsylvania 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
P.O. Box 2063
Market Street State Office Building
Harrisburg, PA 17105-2063
Attn: Office of Field Operations

Wayne County Planning Commission
Mr. Edward J. Coar - Director
925 Court Street
Honesdale, PA 18431

Wayne County Board of Commissioners
Mr. Brian W. Smith - Chairperson
925 Court Street
Honesdale, PA 18431

Paupack Township Board of Supervisors
Mr. Bruce Chandler – Chairman
25 Daniels Road
Lakeville, PA 18438

Paupack Township Planning Commission
Mr. William Lgoe
25 Daniels Road
Lakeville, PA 18438

Cherry Ridge Township
Mr. John W. Rickard Jr. - Chairperson
269 Spinner Road
Honesdale, PA 18431

Cherry Ridge Township Planning
Commission
Mr. Lenny Tasselmeyer – Member
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Honesdale, PA 18431

Palmyra Township Board of Supervisors
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Paupack, PA 18451

Palmyra Township Planning Commission
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Hawley, PA 18428-4526

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C/O: John R Simpson
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Dalton, PA 18414-0285

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Honesdale, PA 18431-2063

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Hawley, PA 18428-0323

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Hawley, PA 18428-9069

Kenneth & Colleen F. Connors
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Hawley, PA 18428-4515

Lakeview Hunting Club
C/O: Donald E Chapman
PO Box 48
Hamlin, PA 18427-0048

Leonard Bates
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Honesdale, PA 18431-2374

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Scarsdale, NY 10583-1353

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Lorrie A. Allen
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Nicolae & Elfriede Predescu
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Hawley, PA 18428-4526

Randal Rowe
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Honesdale, PA 18431-2361

Riverdale Rod & Gun Club Inc
C/O: Thomas La Tournous
211 Goose Pond Rd E
Lake Ariel, PA 18436-5715

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Stephen J. Toomey
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Steven J. & Rosalie McCune
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Hawley, PA 18428

Steven J. Singer
1122 Acacia Dr
Hawley, PA 18428-4666

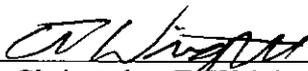
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Edison, NJ 08837-2703

Whitney Lake Association
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Florham Park, NJ 07932-2534

William R Goodwin
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Date: July 19, 2012



Christopher T. Wright