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File #: 140066

August 30, 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

RECEIVED
2012 AUG 30 PM 4:00
PA PUC
SECRETARY'S BUREAU

RE: Letter Of Notification Of PPL Electric Utilities Corporation, Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G, With Respect To The West Hershey #1 And #2 138/69 kV Transmission Tap Line In Derry Township, Dauphin County, Pennsylvania - Docket No. A-2012-

Dear Secretary Chiavetta:

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

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

Construction is scheduled to commence in early 2013, following approval by the Pennsylvania Public Utility Commission, to meet a required in-service date of May 2014.

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

Rosemary Chiavetta, Secretary
August 30, 2012
Page 2

Respectfully Submitted,

Jessica R. Rogers

JRR/jl

Enclosures

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

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PA PUC
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: Letter Of Notification Of PPL Electric :
Utilities Corporation, Filed Pursuant To 52 :
Pa. Code Chapter 57 Subchapter G, With : Docket No. A-2012-_____
Respect To The West Hershey #1 And #2 :
138/69 kV Transmission Tap Line In Derry :
Township, Dauphin County, Pennsylvania :

LETTER OF NOTIFICATION

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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 siting and construction of the West Hershey #1 and #2 138/69 kV Transmission Tap Line (“West Hershey Tap Line”) in Derry Township, Dauphin County, Pennsylvania. The Project is being undertaken in order to serve the planned West Hershey 69-13 kV Substation. Together, the tap line and substation are required to meet the increasing demand for electricity and improve reliability of service in the Derry Township area of Dauphin County. PPL Electric has met with officials from Derry Township and Dauphin County, and they did not oppose the Project. Subject to the Commission’s approval, construction on the Project is scheduled to begin in April 2013 in order to meet the Project’s in-service date of May 2014. In support thereof, PPL Electric states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Letter of Notification is filed by PPL Electric, a public utility that provides electric distribution, transmission, and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission.

2. PPL Electric's address is:

Two North Ninth Street
Allentown, Pennsylvania 18101

3. PPL Electric's attorneys are:

David B. MacGregor (Pa. Bar I.D. #28804)
Post & Schell, P.C.
Four Penn Center
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Fax: 610.774.6726
E-mail: perussell@pplweb.com

PPL Electric's attorneys are authorized to receive all notices and communications regarding this Letter of Notification.

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SECRETARY'S BUREAU

4. PPL Electric furnishes electric service to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania. PPL Electric is a “public utility” and an “electric distribution company” as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803.

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

6. Accompanying this Letter of Notification is a separately bound volume containing Attachments 1-6, which provide additional information about the proposed construction of the West Hershey Tap Line:

- Attachment 1 Necessity Statement.
- Attachment 2 Engineering Description.
- Attachment 3 Environmental Assessment.
- Attachment 4 PPL Electric Design Criteria and Safety Practices.
- Attachment 5 PPL Electric Magnetic Field Management Program.
- Attachment 6 List of Involved Governmental Agencies, Municipalities, and Other Public Entities.

7. This Letter of Notification and accompanying Attachments, which are incorporated herein by reference, contain all the information required by 52 Pa. Code § 57.72(d)(4).

8. The West Hershey Tap Line is required to meet the increasing demand for electricity and improve reliability and operating flexibility in the Derry Township, Dauphin County area.

9. The construction proposed in this Letter of Notification will extend approximately 150 feet from the existing Reese Candy #1 and #2 138/69 kV Tap Line to the new West Hershey 69-13 kV Substation.

10. The total estimated cost of the proposed Project is approximately \$2.5 million. This includes approximately \$370,000 for the transmission line and approximately \$2.13 million for the substation and associated distribution lines.

11. Construction is scheduled to begin in April 2013, in order to support the Project's in-service date of May 2014.

II. THE PROJECT

12. The West Hershey Tap Line is located in Derry Township, Dauphin County. An aerial exhibit showing the location of the proposed facilities is provided at the end of Attachment 2 to this Letter of Notification. The aerial exhibit depicts the location of the proposed construction route.

13. The construction of the West Hershey Tap Line will involve the construction of approximately 150 feet of transmission line. The Line will be designed and built for double-circuit operation. Initially, however, only a single circuit will be installed, and the line will be operated at 69 kV. The additional circuit will be added, and the operating voltage will be increased, when load growth in the area makes it appropriate to do so.

14. The Necessity Statement for the proposed construction of the West Hershey Tap Line is provided as Attachment 1 accompanying this Letter of Notification. The Project is being undertaken in order to serve the planned West Hershey 69-13 kV Substation. As explained in

the Necessity Statement, this Project is necessary to comply with the reliability requirements found in PPL Electric's Reliability Principles and Practices ("RP&P") and to meet increasing demand in the area.

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

16. The area of concern is currently served from the Hershey 69-13 kV Substation and the South Hershey 69-13 kV Substation via each substation's associated 13 kV distribution lines: the Hershey 55-1, Hershey 55-2, Hershey 55-3, Hershey 55-4, Hershey 55-5, Hershey 55-6, Hershey 55-7, Hershey 55-8, South Hershey 54-1, South Hershey 54-2, South Hershey 54-5, South Hershey 55-6, South Hershey 55-7, and South Hershey 55-8 distribution lines. Presently, these 13 kV distribution lines serve more than 9,300 customers in the Derry Township area.

17. PPL Electric has identified four separate issues in the Derry Township, Dauphin County area that will be resolved by the proposed Project. First, loading at the South Hershey 69-13 kV Substation exceeds RP&P guidelines for maximum substation capability. The capability for this substation is 30.4 MVA. The substation reached a peak load of 37.5 MVA during the 2011 summer season and is forecasted to reach a peak load of 37.6 MVA by 2013. As a result, South Hershey Substation cannot accommodate any additional load for future growth,

and load shedding may be required during peak summer months for maintenance and other outages.

18. The second issue identified by PPL Electric is that loading at the Hershey 69-13 kV Substation also exceeds PPL Electric's RP&P guidelines for maximum substation capability. The capability for this substation is 29.6 MVA. The substation reached a peak load of 35 MVA during the 2011 summer and is forecasted to reach a peak load of 38 MVA by 2013. As a result, Hershey Substation cannot accommodate any additional load for future growth, and load shedding may be required during peak summer months for maintenance and other outages.

19. The third issue identified by PPL Electric is that loading on the South Hershey 54-1 distribution line exceeds the normal planning guidelines based on PPL Electric's RP&P. The existing South Hershey 54-1 13 kV getaway conductor is a #500 XLP copper conductor located in a shared duct pack¹ with two other distribution circuits. The normal planning guideline for this conductor is 9,100 kVA. The distribution line reached a peak load of 10,500 kVA during the 2011 summer, which is greater than the normal planning guideline but less than the emergency guideline. However, overloading the South Hershey 54-1 13 kV line could result in conductor damage or failure, which would interrupt service to approximately 2,175 customers until repairs could be made.

20. The final issue identified in this area is that loading on the South Hershey 54-5 distribution line exceeds the normal planning guidelines based on PPL Electric's RP&P. The existing South Hershey 54-5 13 kV getaway conductor is a #500 XLP copper conductor located in a shared duct pack with two other distribution circuits. The normal planning guideline for this conductor is 9,500 kVA. The distribution line reached a peak load of 9,700 kVA during the 2011 summer, which is greater than the normal planning guideline but less than the emergency

¹ A duct is an underground tube and/or pipe used for enclosing electrical cables.

guideline. However, overloading the South Hershey 54-5 13 kV line could result in conductor damage or failure, which would interrupt service to approximately 1,100 customers until repairs could be made.

21. In order to resolve the issues explained above, PPL Electric proposes to construct the West Hershey Tap Line, which will serve the proposed West Hershey 69-13 kV Substation. Two new 13 kV distribution lines will be installed from the new substation to serve customer load in the area. These system additions will relieve overloading on existing facilities and increase reliability and operating flexibility. The proposed West Hershey 69-13 kV Substation will provide critical capacity and improve reliability in the Hershey area.

22. The two new 13 kV distribution lines will serve part of the load currently being supplied by the South Hershey distribution lines and will reduce peak loading on South Hershey Substation by 16.3 MVA. This load transfer will create additional available capacity at South Hershey Substation and allow it to relieve the distribution lines served by the Hershey Substation. Once completed, the proposed substation and distribution reinforcements will provide transfer capability between all three substations in the Hershey area during maintenance and other equipment outages. This Project will resolve all identified RP&P violations in the area.

23. The West Hershey Substation and Tap Lines will be constructed on an approximately 2.19 acre parcel owned by PPL Electric. No additional right-of-way is required for the construction of the tap lines.

24. The proposed West Hershey Tap Line will require two single-shaft steel monopoles. The double-circuit tap structure will consist of a high pole that is approximately 110

feet tall and a low pole that is approximately 55 feet tall. They will be installed on concrete foundations.

25. The West Hershey Tap Line will initially contain three power conductors and one overhead ground wire. The power conductors will be 556.5 kcmil,² 24/7 strand ACSR.³ A 3/8-inch steel overhead ground wire will provide lightning protection for the proposed tap line. In the future, when increased demand requires the installation of a second circuit, the additional power conductors will be installed. The second circuit will be identical to the first circuit.

26. The proposed construction of the West Hershey Tap Line will be designed to comply with, and will generally surpass, the applicable minimum standards in the National Electrical Safety Code (“NESC”).

27. The estimated cost to design and construct the transmission portion of this Project is approximately \$370,000.

28. Subject to the Commission’s approval, construction is scheduled to begin in April 2013, in order to support the Project’s scheduled in-service date of May 2014.

29. PPL Electric identified one alternative to the proposed Project. An alternative to building the new substation, transmission lines, and distribution lines would be to increase the transformer capacity at the Hershey and South Hershey Substations. The four existing 20 MVA transformers would need to be upgraded to 35 MVA. The metal clad switchgear and transformer circuit breakers would also need to be upgraded to accommodate the increase in capacity. In addition, several distribution reinforcements would be required to relieve the identified overloads on the distribution lines. Over two miles of a duct and manhole system would need to be

² A kcmil is a thousand circular mils. A circular mil is the cross-sectional area of a wire one mil in diameter, where 1 kcmil = 0.5067 mm².

³ Aluminum conductor steel reinforced.

replaced so that a higher capacity getaway conductor could be utilized. A new line and terminal would also need to be constructed from the Hershey Substation in order to relieve loading on the South Hershey 54-1 line. The functional alternative is estimated to cost \$5,235,000.

30. PPL Electric rejected this alternative because the proposed Project provides additional reliability and operating flexibility, allows for a better long-term plan for the entire area, and is less expensive.

31. The Engineering Description of the proposed construction of the West Hershey Tap Line is provided in Attachment 2 accompanying this Letter of Notification.

III. HEALTH AND SAFETY

32. The proposed construction of the West Hershey Tap Line will not create any unreasonable risk of danger to the public health or safety. The proposed Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable NESC minimum standards and all applicable legal requirements. Descriptions of NESC standards, PPL Electric's design criteria, and PPL Electric's safety practices are provided in Attachment 4.

33. PPL Electric does not believe that the current scientific evidence demonstrates that magnetic fields cause any adverse health effects or pose a health or safety danger to the public. Nevertheless, PPL Electric has determined, as a matter of policy, to design its new and rebuilt transmission lines to reduce magnetic fields when that can be done at low or no cost and consistent with functional requirements.

34. Attachment 5 accompanying this Letter of Notification explains PPL Electric's standards for Magnetic Field Management. PPL Electric's Magnetic Field Management Program has been developed to implement that policy decision. To reduce magnetic field

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

35. Consistent with the program, PPL Electric will construct the new overhead line sections for five feet higher ground clearance than NESC standards to reduce magnetic field exposures. Since the initial construction will involve only a single-circuit, reverse phasing is not possible at this time. Reverse phasing will be evaluated in the future when system conditions justify the installation of the second circuit.

IV. ENVIRONMENTAL EVALUATION

36. The proposed West Hershey Tap Line will be located in Derry Township, Dauphin County. The new overhead line section will be located entirely on property owned in fee by PPL Electric. The Project is bordered to the west by an agricultural field, to the north by railroad tracks, to the east by a commercial/industrial facility, the Reese's candy factory, and to the south by an agricultural field and PA Route 422. It is anticipated that the proposed construction will have minimal incremental impacts on the surrounding area.

37. No nearby communication towers, pipelines or other utilities will be affected by the proposed construction. The closest airport, the Reigle Field Airport (58N), is approximately 5.00 miles east of the project area. PPL Electric does not anticipate any problem due to distance between the project location and the airport, as well as the pre-existing electrical facilities in the vicinity. However, PPL Electric will file the appropriate documentation with both the Federal Aviation Administration and the PennDOT Bureau of Aviation to ensure that the proposed construction will not be a hazard to the airport's flight operations.

38. The proposed construction of the West Hershey Tap Line was reviewed by the Pennsylvania Historical and Museum Commission (“PHMC”). The PHMC determined that there is a high probability that archaeological sites are located in the project area.⁴ The PHMC notes in correspondence, however, that, although there are no recorded sites within the project boundaries, the project setting is similar to other known archaeological sites in the area. The PHMC recommended, but did not require, a Phase I archaeological survey of the project area.

39. To comply with this recommendation, PPL Electric retained Dr. Frank Vento to perform the Phase I archaeological survey of the project area. The Phase I survey was completed in October 2011 and Dr. Vento recommends no additional work. Dr. Vento provided the appropriate survey report to the PHMC in December of 2011. PPL Electric received correspondence from the PHMC dated January 26, 2012 in which the PHMC agrees with Dr. Vento’s recommendation that no additional archaeological work is required for this Project.

40. The closest structure of historical significance is the Hershey Community Center Building which is located approximately 1.30 miles east of the proposed project location. No impacts to the structure are anticipated due to the distance and heavy development between the structure and the proposed Project.

41. The Project will not affect any unique geological, scenic or natural areas. The overhead line will be located in industrial/commercial areas of Derry Township. Tree clearing is not required. The line will not cross any wetlands or other aquatic resources.

42. PPL Electric will obtain all permits necessary from the Pennsylvania Department of Environmental Protection and the United States Army Corps of Engineers and will comply with all conditions placed on the permits. In addition, PPL Electric will acquire any required soil

⁴ File No. ER 2011-1828-043-A.

erosion and sedimentation control permits and comply with any conditions placed on those permits.

43. PPL Electric has coordinated with the relevant state and federal agencies to obtain information regarding endangered and threatened species that could occur in the study area. A review of the Pennsylvania Natural Diversity Inventory (“PNDI”) records indicated that there was a potential impact under the jurisdiction of the United States Fish and Wildlife Service (“USFWS”).⁵ The USFWS reports that the project area is within the known range of the bog turtle (*Clemmys mohlengerii*).

44. PPL Electric retained Rick Mellon, of Mellon Biological Services, to perform threatened and endangered species studies and Michael Wood, of Woodland Design Associates, to perform the required wetland delineations. Bog turtles are known to inhabit certain types of wetlands. However, Woodland Design Associates determined that there are no wetlands within the project area. Mr. Mellon supplied the appropriate information to the USFWS. Correspondence from the USFWS, dated December 2, 2011, concludes that, based on the information supplied by Mr. Mellon, the proposed Project will not affect the bog turtle.

V. NOTICE

45. The proposed construction of the West Hershey Tap Line was reviewed with Derry Township and Dauphin County. The Township and the County have no objection.

46. Attachment 6 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 6 in accordance with 52 Pa. Code § 57.72(d)(3).

⁵ PNDI Search ID 20111017321520.

VI. LETTER OF NOTIFICATION

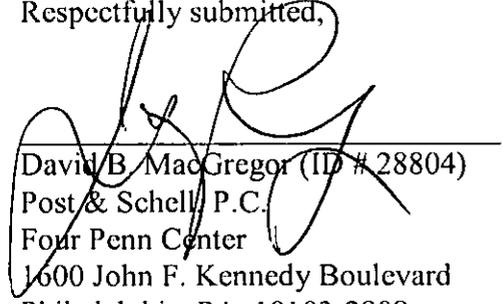
47. PPL Electric is proceeding by means of a Letter of Notification, instead of a full Application, pursuant to the Commission's regulations at 52 Pa. Code § 57.72(d). The proposed construction of the West Hershey Tap Line qualifies for use of a Letter of Notification because the West Hershey Tap Line will be less than two miles in length.

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

VII. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve the proposed siting and construction of the West Hershey #1 and #2 138/69 kV Transmission Tap Line in Derry Township, Dauphin County, Pennsylvania, that is explained above and in the Attachments hereto.

Respectfully submitted,



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Of Counsel:
Post & Schell, P.C.

Date: August 30, 2012

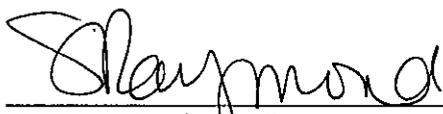
Attorneys for PPL Electric Utilities Corporation

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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: 8-23-12



Stephanie Raymond

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Letter of Notification** has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

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

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

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

Dauphin County Board of Commissioners
PO Box 1295
Harrisburg, PA 17108
ATTN: Jeffrey T. Haste, Chairperson

Date: August 30, 2012

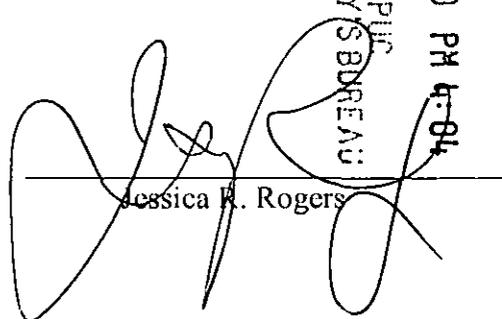
Derry Township Planning Commission
600 Clearwater Road
Hershey, PA 17033
ATTN: Ned Wehler, Chairperson

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

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

Bureau of Investigation & Enforcement
PO Box 3265
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Office of Small Business Advocate
Commerce Building
300 North Second Street, Suite 1102
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