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File #: 140066

November 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

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PA PUC  
SECRETARY'S BUREAU

**RE: Letter of Notification of PPL Electric Utilities Corporation, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to Re-Terminate an Existing Transmission Line into a Proposed New Switchyard at the Sunbury 500-230-138-69 kV Substation in Monroe Township, Snyder 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.

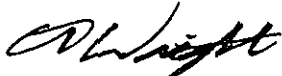
As indicated on the certificate of service, copies of the Letter of Notification and accompanying exhibits and appendices are being served by certified mail, return receipt requested upon the property owners and the involved governmental agencies and municipalities.

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 May 2015.

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

Rosemary Chiavetta, Secretary  
November 30, 2012  
Page 2

Respectfully Submitted,



Christopher T. Wright

CTW/jl

Enclosures

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

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**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 Re-terminate an :  
Existing Transmission Line into a :  
Proposed New Switchyard at the :  
Sunbury 500-230-138-69 kV Substation :  
in Monroe Township, Snyder County, :  
Pennsylvania :

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**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 re-termination of approximately 400 feet of the existing Sunbury-Susquehanna #2 500 kV Transmission Line into a new Sunbury 500 kV Gas Insulated Switchyard (GIS) at the Sunbury 500-230-138-69 kV Substation ("Sunbury Project").<sup>1</sup> This Project will be located entirely within PPL Electric's easement at the Sunbury Generating LLC power station in Monroe Township, Snyder County, Pennsylvania. PPL Electric has provided information regarding this Project to these political subdivisions, which have not objected to the Project.

This Project will replace an existing, aged 500 kV GIS. The replacement will increase the reliability of this switchyard and alleviate concerns about future maintenance problems with the existing 500 kV GIS. This Project also will resolve violations of PPL Electric's Reliability

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<sup>1</sup> A switchyard is an interconnection that, unlike a step-up or step-down transformer, maintains voltage. A GIS is a specific type of switchyard typically used for higher voltage interconnections.

Principles and Practices (“RP&P”) and help maintain compliance with the transmission operational limits established by PJM Interconnection, L.L.C. (“PJM”). Subject to the Commission’s approval, construction of this Project is scheduled to begin in June 2013, to support an 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 PPL Electric Utilities Corporation, Two North Ninth Street, Allentown, Pennsylvania 18101.

3. PPL Electric’s attorneys are:

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

David B. MacGregor (Bar I.D. #28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
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John H. Isom (Bar I.D. #16569)  
Christopher T. Wright (Bar I.D. # 203412)  
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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. 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 List of Owners of Property within the Right-of-Way
- Attachment 7 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).

## **II. THE PROJECT**

### **A. OVERVIEW**

8. The existing and aged Sunbury 500 kV GIS located at the Sunbury Substation is no longer supported by the vendor. The vendor who supplied the original equipment for the existing 500 kV GIS no longer offers support or parts for this equipment. Consequently, any equipment failure within the Sunbury 500 kV GIS would result in extended outages, for at least one month, while replacement parts are obtained. In addition, several components of the Sunbury 500 kV GIS have been identified by PPL Electric's Engineering group as being at risk of failure.

9. PPL Electric proposes to replace the existing Sunbury 500 kV GIS with a new 500 kV GIS. In order to connect the new Sunbury 500 kV GIS to the electric grid, PPL Electric seeks Commission approval to re-terminate approximately 400 feet of the existing Sunbury-Susquehanna #2 500 kV Transmission Line into a new dead-end structure for the new Sunbury 500 kV GIS.

10. This Project will resolve maintenance concerns that PPL Electric has with the existing Sunbury 500 kV GIS. This Project also will resolve violations of PPL Electric's RP&P, help ensure compliance with the operation limits set forth in PJM's Manual for Transmission Operations as defined in PJM Manual 03: Transmission Operations, Revision 40 (June 1, 2012), and improve reliability and increase operating flexibility in central Pennsylvania.

11. The total cost of the Project, including the construction of the new Sunbury 500 kV GIS and re-termination of the transmission line, is estimated at \$33,076,000. The estimated cost to re-terminate the Sunbury-Susquehanna #2 500 kV Transmission Line is \$258,900.

12. Subject to the Commission's approval, construction of this Project is scheduled to begin by October 2014 to meet a required in-service date of May 2015.

13. As explained below, PPL Electric does not require any additional right-of-way for the re-termination of the Sunbury –Susquehanna #2 500 kV Transmission Line.

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 transmission facilities for this Project.

## **B. NEED FOR THE PROJECT**

### **1. Transmission Planning**

15. 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.

16. PJM has developed the *PJM Manual for Transmission Operations* to establish operational limits and guidelines for transmission owners within the PJM service territory. Transmission owners within the PJM service territory are required to operate their transmission systems in compliance with the *PJM Manual for Transmission Operations*.

17. 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 (non-BES) 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 PJM Manual for Transmission Operations. A further description of PPL Electric's system planning process is provided in Attachment 1 to this Letter of Notification.

18. The Necessity Statement for the proposed Sunbury 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 PPL Electric RP&P, maintain compliance with the PJM Manual for Transmission Operations, and to improve the reliability of the BES serving central Pennsylvania.

## **2. Existing System**

19. The Sunbury 500-230-138-69 kV Substation is located at the Sunbury Generating LLC power station in Monroe Township, Snyder County. The Sunbury 500-230-138-69 kV Substation contains five switchyards: two at 69 kV, one at 138 kV, one at 230 kV, and one at 500 kV.

20. Two transmission lines terminate at the existing Sunbury 500 kV GIS: the Sunbury-Susquehanna # 2 500 kV Transmission Line, and the Juniata-Sunbury 500 kV Transmission Line.<sup>2</sup> The Sunbury 500 kV GIS receives and provides 500 kV supply by way of these two Lines. The Sunbury Substation also serves local customer load by way of 69 kV circuits.

21. The existing Sunbury 500 kV GIS is also connected to the Sunbury 230 kV Switchyard through the 500/230 kV Transformer T24, which transforms or steps-up the voltage from 230 kV to 500 kV. The Sunbury 500 kV GIS also receives power from the 230 kV

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<sup>2</sup> Although the Juniata-Sunbury 500 kV Transmission Line terminates at the existing Sunbury 500 kV GIS, this Line will not be re-terminated as part of this project. The Juniata-Sunbury 500 kV Transmission Line will be re-terminated via gas piping and an existing switchyard dead-end structure. No new transmission line is required for the Juniata-Sunbury 500 kV Transmission Line.

transmission system through Transformer T24 by way of 230 kV transmission lines that terminate at the Sunbury 230 kV Switchyard.

### **3. Need to Replace the Existing Sunbury 500 kV GIS**

22. The Sunbury 500 kV GIS is critical to the reliability of the BES and interconnected transmission grid serving central Pennsylvania.

23. The existing Sunbury 500 kV GIS is approximately 30 years old (installed in 1982). The vendor that supplied the original equipment for the existing Sunbury 500 kV GIS no longer offers support or parts for this equipment. Therefore, any equipment failures within the Sunbury 500 kV GIS would result in extended outages, for at least one month, while replacement parts are obtained.

24. In addition, PPL Electric's Engineering Group has identified several components of the Sunbury 500 kV GIS as being at risk of failure.

25. The lack of readily-available spare parts and the potential for equipment failures in the near future qualify the existing Sunbury 500 kV GIS for replacement under PPL Electric's RP&P.

26. Further, an unplanned outage (contingency) of the Transformer T24 would exceed the applicable transfer limits of the central Pennsylvania BES. Transfer limits are used to limit the total flow across the transmission paths to protect the system from large voltage drops or collapse caused by a contingency. This would be a violation of the PJM Manual for Transmission Operations.

27. In addition, the unplanned outage of the Sunbury-Susquehanna #2 500kV transmission line or the Juniata-Sunbury 500 kV Transmission Line or the loss of the Sunbury 500kV GIS switchyard would cause the BES serving the area to exceed the applicable stability limits. PJM established stability limits to prevent electrical separation of a generating unit or a

portion of a regional transmission operator from the electric grid. The loss of any one of these facilities would require operating personnel to reduce Susquehanna generator unit #2 to 900MW until the Lines are put back into service to avoid this stability concern. Further, if during this time the Susquehanna-Wescosville-Alburtis 500kV Transmission Line also has a unplanned outage, the special protection scheme (SPS) at Susquehanna will trip off line the Susquehanna generator unit #2 to avoid a stability concern.

28. To mitigate both the transfer and stability limit issues, and maintain compliance with the PJM Manual for Transmission Operations, the Sunbury 500 kV GIS, including the T24 Transformer and the two 500 kV transmission lines connected to the GIS, must be maintained as a highly reliable and operating substation.

### **C. THE PROPOSED PROJECT**

29. In order to resolve the reliability, maintenance, and operations issues described above, PPL Electric, with approval from the Commission, plans to re-terminate approximately 400 feet of the existing Sunbury-Susquehanna #2 500 kV Transmission Line into the new 500 kV dead-end structure at the proposed Sunbury 500 kV GIS.

30. The re-termination of the Sunbury- Susquehanna #2 500 kV Transmission Line will not require any no new poles, but will require the installation of new anchor guys on existing poles within PPL Electric's easement area. All anchor guys will be installed on concrete foundations.

31. Six power conductors and two overhead ground wires will be re-terminated at the new Sunbury 500 kV GIS. The power conductors will be twin bundled, 2493 kcmil<sup>3</sup> 54/37

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<sup>3</sup> 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.

stranding Aluminum Conductor Aluminum Alloy Reinforced (ACAR). The overhead ground wires will be 19 #9 alumoweld and will provide lightning protection for the re-terminated Lines.

32. The existing 500 kV GIS equipment will be removed following the installation of the new 500 kV GIS and re-termination of the existing Sunbury- Susquehanna #2 500 kV Transmission Line.

33. Replacement of the existing 500 kV GIS will increase the reliability of this switchyard and alleviate concerns about future maintenance problems with the existing 500 kV GIS. The proposed Sunbury Project will resolve the violations of PPL Electric's RP&P and help maintain compliance with the PJM Manual for Transmission Operations.

34. The total estimated cost for the proposed Sunbury Project is approximately \$33,076,000. The estimated cost to re-terminate the Sunbury-Susquehanna #2 500 kV Transmission Line is \$258,900.

35. The construction of the Sunbury Project has been carefully coordinated with planned outages of the Sunbury-Susquehanna #2 500 kV Transmission Line and the Unit 2 outage at the Susquehanna Steam Electric Station nuclear plant in 2013 and 2015. Subject to the Commission's approval, construction on the new Sunbury 500 kV GIS is scheduled to begin in June 2013, and transmission re-termination work is scheduled to begin in October 2014, to support the Project's overall in-service date of May 2015.

36. The Engineering Description of the proposed Sunbury Project is provided in Attachment 2 accompanying this Letter of Notification.

### **III. HEALTH AND SAFETY**

37. The proposed Sunbury Project will not create any unreasonable risk of danger to the public health or safety. The re-terminated Sunbury-Susquehanna #2 500 kV Transmission Line 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.

38. Attachment 5 accompanying this Letter of Notification explains PPL Electric’s standards for Magnetic Field Management. The ground clearances for the re-terminated Sunbury-Susquehanna #2 500 kV Transmission Line will be increased twenty feet higher than those required by the NESC standard in order to reduce the magnetic field exposure.

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

40. The closest airport is the Penn Valley Airport, which is a private airport located approximately 2.1 miles from the Sunbury Project site. 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**

41. PPL Electric does not require any additional right-of-way for the Sunbury Project.

42. The Sunbury Substation is located at the Sunbury Generating LLC power station along South Old Trial Road in Monroe Township. The new 500 kV GIS and re-terminated section of the Sunbury-Susquehanna #2 500 kV Transmission Line will be located within the fenced area of the existing Sunbury Generating LLC coal fired generating station.

43. The re-terminated Sunbury-Susquchanna #2 500 kV Transmission Line will be constructed entirely within the existing easement area owned by PPL Electric for the Sunbury 500 kV GIS.

44. 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 that will be rebuilt by this Project.

**V. LAND USE AND ENVIRONMENTAL EVALUATION**

45. As explained above, construction of the proposed Sunbury Project will take place within the fenced area of the existing Sunbury Generating LLC coal fired generating station. It is anticipated that the proposed Sunbury Project will have minimal incremental impacts on the area.

46. The proposed Sunbury Project will be constructed in Monroe Township, Snyder County. Impacts to land use, cultural resources, and natural features are anticipated to be *minimal because the Sunbury Project will be constructed entirely within the PPL Electric-owned easement for the Sunbury 500 kV GIS and because the length of the line segment to be re-terminated is relatively short.*

47. No tree clearing is required for the Sunbury Project.

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

49. The Sunbury Project will not traverse or affect any unique geological, scenic, or natural areas.

50. The Sunbury Project will not affect any recreational areas or natural landmarks.

51. The Project area was reviewed with the Pennsylvania Historical and Museum Commission (PHMC). The PHMC has determined that no evaluation of historic structures will be necessary for this Project.

52. PPL Electric will avoid impacts to wetlands to the maximum extent practical. 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.

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

54. 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, the Pennsylvania Game Commission (“PGC”), and the U.S. Fish and Wildlife Service has been completed. The PGC has indicated a potential impact to the Indiana Bat (Northern Myotis). PPL Electric retained Mellon Biological Services, LLC to conduct field reviews. Based upon these reviews, the PGC has indicated that no impacts to the Indiana Bat are anticipated. Therefore, the Sunbury Project will have no negative impact on any threatened or endangered species.

## **VI. NOTICE**

55. PPL Electric has provided information regarding the Sunbury Project to representatives of the Monroe Township and Snyder County. These entities have not objected to the proposed Project.

56. 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).

57. All owners of land subject to the right-of-way and easement are listed in Attachment 6. The landowners listed in Attachment 6 were notified by PPL Electric representatives and sent a letter summarizing the proposed Project. Further, copies of this Letter of Notification will be served on the landowners.

**VII. LETTER OF NOTIFICATION**

58. 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)(vi). The proposed Sunbury Project qualifies for use of a Letter of Notification because the total length is less than two miles.


59. 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 Sunbury 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 re-termination of the existing Sunbury-Susquehanna #2 500 kV Transmission Line into a new Sunbury 500 kV Gas Insulated Switchyard at the Sunbury 500-230-138-69 kV Substation in Monroe Township, Snyder County, Pennsylvania, that is explained above and in the Attachments hereto.

Respectfully submitted,

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Associate General Counsel  
PPL Services Corporation  
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Allentown, PA 18106  
Phone: 610-774-4254  
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Date: November 30, 2012

Attorneys for PPL Electric Utilities Corporation

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**VERIFICATION**

I, Stephanie Raymond, being the Vice President – Transmission and Substations at 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: 11/28/12

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, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120-0053  
ATTN: Mr. Douglas C. McLearn, Chief

Monroe Township Supervisors  
39 Municipal Drive  
Selinsgrove, PA 17870

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

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

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

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

Snyder County Office of Planning  
Snyder County Courthouse  
PO Box 217  
Middleburg, PA 17842

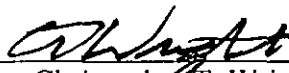
Office of Small Business Advocate  
Commerce Building  
300 North Second Street, Suite 1102  
Harrisburg, PA 17101

Snyder County Board of Commissioners  
PO Box 217  
9 West Market Street,  
Middleburg, PA. 17842

Sunbury Generating LLC  
PO Box 517  
Shamokin Dam, PA 17876

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Christopher T. Wright