

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. WP-2

DIRECT TESTIMONY OF

DOUGLAS L. HAUPT

1 Q Please state your name and business address.

2 A. My name is Douglas L. Haupt. My business address is 434 Susquehanna Trail,
3 Northumberland, PA 17857-9774.

4

5 Q. By whom are you employed and in what capacity?

6 A. I am employed by PPL Electric Utilities Corporation (“PPL Electric”) as a Senior Siting
7 Specialist.

8

9 Q. What is your educational background?

10 A. I have a High School Diploma and 15 credits towards an associate degree in Electric
11 Power Technology from Bismarck State College. I have attended various seminars
12 including;

13 • EUCI (formerly Electric Utility Consultants, Inc.), Public Participation in
14 Transmission Siting, 2010 and 2012

15 • EUCI, Public Communication During the Construction Phase, 2010

16 • Halfmoon LLC, Pennsylvania Land Use and Environmental Issues Impacting
17 “Utility” Construction Projects, 2009

18 • Burns & McDonnell, Transmission Line Symposium, 2007

19 PPL Electric Utilities Training:

20 • PQ5056 PPL Environmental Awareness, 1996

21 • CCT014 PPL Standards of Conduct, 2012

22 • ArcMap GIS Training

23

1 Q. Describe your experience and employment history with PPL Electric.

2 A. I have been employed by PPL Electric for 21 years. I have been in my current position,
3 as Senior Siting Specialist, since May 2011. In this position, I am responsible for the
4 oversight and direction of siting consultants on large scale projects for the selection of
5 high voltage transmission line routes and substation locations. I am responsible for
6 identifying and selecting high voltage transmission line routes and substation locations on
7 smaller scale projects and for preparing applications and exhibits for approval by the
8 Pennsylvania Public Utility Commission (PUC or Commission). I also am responsible
9 for preparing expert testimony and testifying before the PUC to support the route and
10 substation site selection process. I previously held various positions with PPL Electric,
11 including;

- 12 • September 2006 – May 2011: Siting Coordinator, where I was responsible for
13 identifying and selecting transmission line routes and substation locations on
14 projects and for preparing applications and exhibits for filing with the PUC.
- 15 • April 2000 – September 2006: Abstract and Survey Assistant, with
16 responsibilities to oversee PPL Electric survey activities along with review of title
17 abstracts and right-of-way drawing preparations for new transmission lines and
18 property surveys for substation land acquisitions.
- 19 • July 1991 – April 2000: Survey Level I & Survey Level II, with responsibilities
20 for operating various survey equipment, including Total Stations¹ and GPS
21 Equipment and AutoCAD drafting software.

¹ A Total Station is an electronic/optical instrument used in surveying.

1 • July 1989 – July 1991: Various jobs as a temporary employee, which included
2 Meter Reader, Survey Level I, and Construction
3

4 Q. Have you participated in other transmission line siting projects for PPL Electric?

5 A. Yes. I have worked on 22 projects involving transmission lines designed to operate at
6 voltages greater than 100 kV that have been filed with the Commission to its siting
7 regulations at 52 Pa. Code Ch. 57, Subchapter G.
8

9 Q. Have you testified previously before the Commission.

10 A. Yes. I provided testimony on the route selection process for the Effort Mountain #1 & #2
11 138 kV Transmission Line siting application at Docket No. A-2010-2153061. I also
12 provided testimony in support of the Effort Mountain Substation zoning petition at
13 Docket No. P-2010-2153061.
14

15 Q. What are your responsibilities in connection with the Northeast-Pocono Reliability
16 Project?

17 A. My responsibilities are to provide overall management direction for the siting of the
18 Northeast-Pocono Reliability Project. In this capacity, I have led the formation of a siting
19 team, supervised the acquisition of contract resources, public outreach, line route
20 selection, and support of right-of-way negotiations.
21

22 Q. What is the purpose of your direct testimony in this proceeding?

1 A. I will explain the manner in which PPL Electric's proposed West Pocono 230-69 kV
2 Substation will be constructed consistent with Buck Township's zoning ordinance. By
3 providing this explanation, PPL electric is not agreeing that the Substation or any portion
4 of it should be subject to approval by Buck Township or any of its boards or
5 commissions. Instead, PPL Electric is providing this explanation because the
6 Commission has stated that it will consider the impact of exemptions from zoning
7 requirements on zoning ordinances. 52 Pa. Code § 69.1101. In PPL Electric's view, the
8 construction of the Substation, including the Control Equipment Building, is consistent
9 with Buck Township's zoning ordinance.

10
11 Q. Is PPL Electric seeking a similar finding for the transmission facilities, transformers and
12 other equipment related to the substation?

13 A. No, it is not. I have been informed by PPL Electric's attorneys that public utility
14 facilities (as distinguished from buildings) are not subject to local zoning ordinances
15 because the application of such ordinances is preempted by the comprehensive system of
16 state-wide regulation of public utilities by the Commission primarily under the Public
17 Utility Code.

18
19 Q. Where does PPL Electric intend to locate the West Pocono Substation?

20 A. The Substation will be located on PPL Electric property in Buck Township, Luzerne
21 County. Appendix A to the West Pocono Zoning Petition provides an aerial photograph
22 and map showing the location of the new Substation. The Control Equipment Building
23 location within the Substation is also shown.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

Q. Please summarize how PPL Electric selected the substation site for the West Pocono Substation.

A. The location of the new West Pocono 230-69 Substation was determined prior to the development of the corridors for the proposed transmission line routes through a process of land use and constraint analysis. Strategic locations were identified for the Substation that would be central to the 230 kV sources and within close proximity to the existing 138/69 kV network, which will minimize the length of transmission lines needed to connect the Substation to the electric grid, as well as minimize the costs and environmental impacts of the connecting the associated lines to the Substation. A functional area was established around these locations in which the existing land use and known social and environmental constraints were assessed. Key attributes of the selected substation location included accessibility from adjacent established roadways, a level topographic grade, sturdy soil conditions (no wetlands), and buffered from surrounding residential development by forest or distance to the extent practicable. A detailed explanation of the selection of the site for the West Pocono Substation is provided in Attachment 4 to the Siting Application.

Q. Please describe the West Pocono 230-69 kV Substation.

A. The proposed Substation will be 900 feet by 450 feet or approximately 7.55 acres. The entire area will be fenced in, gated and locked to prevent unauthorized access. The control equipment building will be contained within the fenced-in area. The building will be 40 feet by 70 feet and constructed with corrugated aluminum set upon a concrete

1 foundation. The building will not contain water, sewer, or any other municipal service.
2 Heating and air conditioning will be provided to the extent required by the sensitive
3 electric equipment contained within, without which, the substation could not function.
4

5 Q. Has Buck Township adopted a zoning ordinance?

6 A. Yes, it has.
7

8 Q. Have you reviewed the zoning ordinance to determine how it might be applied to the
9 West Pocono 230-69 kV Substation?

10 A. Yes, I have. A copy of the Buck Township zoning ordinance is provided as Appendix B
11 to the West Pocono Zoning Petition.
12

13 Q. Explain how the Buck Township zoning ordinance might be applied to the Control
14 Equipment Building at the West Pocono 230-69 kV Substation.

15 A. The Buck Township zoning ordinance classifies the substation site as C-1, Conservation.
16 According to pages 3-2, 5-2, and 11-7 of the Buck Township zoning ordinance, any
17 electric substation or associated facilities are a "essential services-closed" that are only
18 permitted by special exception in every zoning district in Buck Township. The Buck
19 Township Zoning Hearing Board hears all applications for special exceptions under the
20 zoning ordinance.
21

22 Q. What is required to be eligible for a special exception under the Buck Township zoning
23 ordinance?

1 A. As set forth on pages 8-6 and 8-7 of the Buck Township zoning ordinance, in order to be
2 eligible for a special exception, the applicant must demonstrate compliance with the
3 following general criteria:

4 (a) That the use is a permitted Special Exception as set forth in Article 3.

5 (b) That the use is so designed, located and proposed to be operated that the
6 public health, safety, welfare and convenience will be protected.

7 (c) That the use will not cause substantial injury to the value of other property in
8 the neighborhood where it is to be located.

9 (d) That the use shall be compatible with adjoining development and the character
10 of the zone district where it is proposed to be located.

11 (e) That the adequate landscaping and screening is provided as required in Section
12 4.700 and elsewhere.

13 (f) That adequate off-street parking and loading is provided and ingress and
14 egress is so designed as to cause minimum interference with traffic on abutting
15 streets.

16 (g) That the use conforms with all applicable regulations governing the district
17 where located, except as may otherwise be determined for large-scale
18 development.

19 (h) That such use shall not result in unsafe traffic conditions, traffic congestion or
20 other dangerous traffic conditions.

21 (i) That such use shall be located on a site where the soils are suitable to safely
22 support any structure to be erected; and, where soils are not deemed suitable, a
23 plan shall be submitted, describing proposed methods to compensate for such
24 unsafe soils conditions.

25

26 Q. Are there any additional criteria that are applicable for “essential services-closed”?

27 A. Yes. In addition to the above-mentioned general criteria, a special exception for
28 “essential services-closed,” such as facilities associated with electric substations, must
29 also meet the following requirements set forth on pages 5-2 and 5-3 of the Buck
30 Township zoning ordinance:

1 Such facility shall not be located on a residential street (unless no other site is
2 available), and shall be so located as to draw a minimum of vehicular traffic to
3 and through such streets.

4 The location, design and operation of such facility shall not adversely affect the
5 character of the surrounding residential area.

6 Adequate fences, barriers and other safety devices shall provide, and shall be
7 landscaped in accordance with the provisions of Section 4.730 of the Zoning
8 Ordinance.

9 Noise emitted from electric substations shall not be greater than permitted in
10 accordance with the performance standards set forth in Article 6 of the Zoning
11 Ordinance.

12
13 Q. Are there any other conditions or requirements that could be imposed on the Control
14 Equipment Building?

15 A. Yes. It appears from page 8-6 of the Buck Township zoning ordinance that the Buck
16 Township Zoning Hearing Board retains broad discretion to impose additional conditions
17 or requirements for special exceptions. In addition to the foregoing general and specific
18 criteria, in approving a use by special exceptions, the Zoning Hearing Board “may attach
19 such reasonable conditions and safeguards ... as it may deem necessary....” Further, page
20 9-2 of the Buck Township zoning ordinance requires a zoning permit must be obtained
21 prior to the erection, construction, or use of any building, structure, or portion thereof. A
22 zoning permit is also required prior to the use or change in land.

23
24 Q. Please explain why PPL Electric believes it is necessary to seek an exemption from the
25 Buck Township zoning ordinance.

26 A. Although there is not a complete ban on the construction of electric substations in S-2
27 Conservation Districts, the Zoning Ordinance appears to provide numerous conditions

1 and restrictions that must be met for PPL Electric to commence work on and begin use of
2 the West Pocono 230-69 kV Substation and Control Equipment Building. Further, PPL
3 Electric would be required to obtain a building and/or zoning permit for the West Pocono
4 230-69 kV Substation and Control Equipment Building. In order to obtain such
5 approvals, PPL Electric must follow the permitting procedures set forth in the Zoning
6 Ordinance, including the payment of fees.

7
8 For these reasons, PPL Electric is seeking an exemption for the Buck Township Zoning
9 Ordinance. As explained by Ms. Krizenoskas in PPL Electric Statement No. WP-1, the
10 Northeast-Pocono Reliability Project, including the West Pocono 138/69 kV Substation,
11 is reasonably necessary for the convenience or welfare of the public.

12
13 Q. If, as a result of a finding by the Commission that the substation control equipment
14 building is reasonably necessary for the convenience or welfare of the public, the
15 building is exempt from the Buck Township's zoning ordinance, will PPL Electric
16 consider requests or suggestions from the Township regarding the building?

17 A. Yes. It is PPL Electric's policy to adopt all reasonable suggestions from local
18 governments, including the Buck Township, to the extent that they can be implemented at
19 a reasonable cost and that they would not interfere with the construction or effective
20 operation of the proposed facilities.

21
22 Q. Does this complete your direct testimony?

23 A. Yes, it does.