

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. NP-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 North Pocono 230-69 kV
2 Substation will be constructed consistent with Covington Township's zoning ordinance.
3 By providing this explanation, PPL electric is not agreeing that the Substation or any
4 portion of it should be subject to approval by Covington 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.

8
9 Q. Is PPL Electric seeking a similar finding for the transmission facilities, transformers and
10 other equipment related to the substation?

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

16
17 Q. Where does PPL Electric intend to locate the substation?

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

22

1 Q. Please summarize how PPL Electric selected the substation site for the North Pocono
2 Substation.

3 A. The location of the new North Pocono 230-69 Substation was determined prior to the
4 development of the corridors for the proposed transmission line routes through a process
5 of land use and constraint analysis. Strategic locations were identified for the Substation
6 that would be central to the 230 kV sources and within close proximity to the existing
7 138/69 kV network, which will minimize the length of transmission lines needed to
8 connect the Substation to the electric grid, as well as minimize the costs and
9 environmental impacts of the connecting the associated lines to the Substation. A
10 functional area was established around these locations in which the existing land use and
11 known social and environmental constraints were assessed. Key attributes of the selected
12 substation location included accessibility from adjacent established roadways, a level
13 topographic grade, sturdy soil conditions (no wetlands), and buffered from surrounding
14 residential development by forest or distance to the extent practicable. A detailed
15 explanation of the selection of the site for the North Pocono Substation is provided in
16 Attachment 4 to the Siting Application.

17
18 Q. Please describe the North Pocono 230-69 kV Substation.

19 A. The proposed Substation will be 900 feet by 450 feet or approximately 7.55 acres. The
20 entire area will be fenced in, gated and locked to prevent unauthorized access. The
21 control equipment building will be contained within the fenced-in area. The building will
22 be 40 feet by 70 feet and constructed with corrugated aluminum set upon a concrete
23 foundation. The building will not contain water, sewer, or any other municipal service.

1 Heating and air conditioning will be provided to the extent required by the sensitive
2 electric equipment contained within, without which, the substation could not function.

3
4 Q. Has the Covington Township adopted a zoning ordinance?

5 A. Yes, it has.

6
7 Q. Have you reviewed the zoning ordinance to determine how it might be applied to the
8 North Pocono 230-69 kV Substation?

9 A. Yes, I have. A copy of the Covington Township zoning ordinance is publicly available at
10 the home page for Covington Township, Lackawanna County, Pennsylvania under
11 “Forms and Ordinances.”²

12
13 Q. Explain how the Covington Township zoning ordinance might be applied to the Control
14 Equipment Building at the North Pocono 230-69 kV Substation.

15 A. The Covington Township zoning ordinance classifies the substation site as SC, Special
16 Conservation. According to pages III-9, IV-13, and IV-14 of the Covington Townshp
17 zoning ordinance, electric transmission and distribution poles, wire, and facilities that do
18 not require a building are “essential services” that are a permitted use in every zoning
19 district in Covington Township. However, page IV-17 of the zoning ordinance provides
20 that “semi-public buildings or uses” are not permitted within any SC, Special
21 Conservation zoning district. Page III-19 of the Covington Township zoning ordinance
22 defines “semi-public buildings or uses” as any essential services or public utility facilities

² Available at: <http://covingtontwp.org/documents/zoning-ordinance.pdf>.

1 that require enclosure within any structure or building. Therefore, according to the
2 Covington Township zoning ordinance, the Control Equipment Building associated with
3 the North Pocono 230-69 kV Substation is not permitted at the proposed substation site,
4 which is zoned as a Special Conservation district.

5
6 Q. Are there any other conditions or requirements that could be imposed on the Control
7 Equipment Building?

8 A. Yes. Page VI-1 of the Covington Township zoning ordinance requires a building and/or
9 zoning permit prior to the erection, construction, or use of any building, structure, or
10 portion thereof. A building and/or zoning permit is also required prior to the use or
11 change in land.

12
13 Q. Please explain why PPL Electric believes it is necessary to seek an exemption from the
14 Covington Township zoning ordinance.

15 A. In the absence of an exemption, it is unlawful under the Covington Township Zoning
16 Ordinance for PPL Electric to commence work on and begin use of the North Pocono
17 230-69 kV Substation and Control Equipment Building. In fact, a Control Equipment
18 Building is not permitted in any SC, Special Conservation district.

19
20 Even assuming that a Control Equipment was a permitted, conditional, or special
21 exception use, PPL Electric would still be required to obtain a building and/or zoning
22 permit for the North Pocono 230-69 kV Substation and Control Equipment Building. In

1 order to obtain such approvals, PPL Electric must follow the permitting procedures set
2 forth in the Zoning Ordinance, including the payment of fees.

3
4 For these reasons, PPL Electric is seeking an exemption for the Covington Township
5 Zoning Ordinance. As explained by Ms. Krizenoskas in PPL Electric Statement No. NP-
6 1, the Northeast-Pocono Reliability Project, including the North Pocono 138/69 kV
7 Substation, is reasonably necessary for the convenience or welfare of the public.

8
9 Q. If, as a result of a finding by the Commission that the North Pocono Substation Control
10 Equipment Building is reasonably necessary for the convenience or welfare of the public,
11 the building is exempt from the Township's zoning ordinance, will PPL Electric consider
12 requests or suggestions from the Township regarding the building?

13 A. Yes. It is PPL Electric's policy to adopt all reasonable suggestions from local
14 governments, including the Covington Township, to the extent that they can be
15 implemented at a reasonable cost and that they would not interfere with the construction
16 or effective operation of the proposed facilities. I further note that PPL Electric has
17 provided information to representatives of Covington Township and Lackawanna County
18 describing the Northeast-Pocono Reliability Project, including the North Pocono 230-69
19 kV Substation.

20
21 Q. Does this complete your direct testimony?

22 A. Yes, it does.