

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application Of PPL Electric Utilities :
Corporation Under 15 Pa.C.S. §1511(c) For A :
Finding And Determination That The Service :
To Be Furnished By The Applicant Through : Docket No. A-2013-_____ :
Its Proposed Exercise Of The Power Of :
Eminent Domain To Acquire Right-of-Way :
And Easement Over A Certain Portion Of The :
Lands Of James L. & Michaelene J. Butler In :
Tobyhanna Township, Monroe County, :
Pennsylvania For Siting And Construction Of :
Transmission Lines Associated With The :
Proposed Northeast-Pocono Reliability Project :
Is Necessary Or Proper For The Service, :
Accommodation, Convenience Or Safety Of :
The Public :

**APPLICATION OF
PPL ELECTRIC UTILITIES CORPORATION**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric”) herein files this Application, pursuant to 15 Pa.C.S. §1511(c), for a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire right-of-way and easement over a certain portion of the lands of James L. & Michaelene J. Butler in Tobyhanna Township, Monroe County, Pennsylvania for the siting and construction of transmission lines associated with the proposed Northeast-Pocono Reliability Project is necessary or proper for the service,

accommodation, convenience, or safety of the public. In support of this Application, PPL Electric states as follows:

I. INTRODUCTION

1. This Application 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:

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 Application.

4. PPL Electric is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania. It was duly formed by consolidation and merger, having received Letters Patent dated June 4, 1920, from the Governor of the Commonwealth of Pennsylvania. PPL Electric is now subject to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, Section 103, *as amended*, 15 Pa.C.S. §§ 1101 *et seq.* (“BCL”). PPL Electric submits this Application pursuant Section 1511 of the BCL, 15 Pa.C.S. § 1511.

5. 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.

6. 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.

7. Upon Commission approval, PPL Electric proposes to construct the Northeast-Pocono Reliability Project to resolve reliability and planning violations and to reinforce the 69 kV systems serving the Northeast Pocono region by bringing a new 230 kV supply source closer to the growing load centers. To accomplish this, PPL Electric proposes to locate the new West Pocono and North Pocono 230-69 kV Substations central to the loads they will serve.¹ The two

¹ PPL Electric is filing separate zoning petitions for the West Pocono and North Pocono 230-69 kV Substations, requesting a finding that the buildings to shelter control equipment at each of the

new Substations and associated new transmission lines will reduce the distance between the supply of power and the homes and businesses that use the electricity. This proposed arrangement also will provide an alternative source of power to the Northeast Pocono region in the event that the normal sources are interrupted, which will improve power restoration times and provide operating flexibility and improved reliability for customers in the region. The Northeast-Pocono Reliability Project will reduce the number of customers affected by a single facility outage, as well as the duration of the outage.

8. The proposed new West Pocono and North Pocono Substations will be connected to the existing 230 kV transmission systems by a new 58-mile 230 kV transmission line. PPL Electric also proposes to construct five new 138/69 kV transmission lines, collectively approximately 11.3 miles, to connect the new North Pocono and West Pocono 230-69 kV Substations to the existing local 138/69 kV transmission system.

9. A certain portion of the selected routes for these proposed transmission lines will traverse a portion of the land owned by James L. & Michaelene J. Butler in Tobyhanna Township, Monroe County. By this Application, PPL Electric is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of James L. & Michaelene J. Butler for the construction of transmission lines associated with the Northeast-Pocono Reliability Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

10. On December 28, 2012, PPL Electric is filed the "Application of PPL Electric Utilities Corporation filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of

Substations are reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance pursuant to 53 P.S. § 10619.

the Siting and Construction of Transmission Lines Associated with the Northeast-Pocono Reliability Project in Portions of Luzerne, Lackawanna, Monroe, and Wayne Counties, Pennsylvania” (“Siting Application”), which was docketed at Docket No. A-2012-2340872. Therein, PPL Electric is requesting approval to site and construct the high voltage transmission lines associated with the Northeast-Pocono Reliability Project.

11. With the Siting Application, PPL Electric filed Attachments 1-16, which provide additional detailed information regarding the Northeast-Pocono Reliability Project. Also accompanying the Siting Application are PPL Electric Statement Nos. 1-6, which further explain the Northeast-Pocono Reliability Project.

12. A complete copy of the Northeast-Pocono Reliability Project Siting Application has been served on James L. & Michaelene J. Butler. The Northeast-Pocono Reliability Project Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

13. Accompanying this Application is PPL Electric Statement No. J Butler-1, Direct Testimony of Colleen Kester, together with PPL Electric Exhibit Nos. CK-J Butler-1 through CK-J Butler-5. This testimony and the supporting exhibits describe the proposed Northeast-Pocono Reliability Project, summarize the need for the Project, summarize PPL Electric’s process to site the transmission lines associated with the Project, describe the property of James L. & Michaelene J. Butler in Tobyhanna Township, Monroe County, Pennsylvania, and describe PPL Electric’s proposed right-of-way and easement over said property.

II. NEED FOR THE PROJECT

14. Currently, the only sources of supply to the Northeast Pocono region are 138/69 kV transmission lines. However, it has been approximately 30 years since the last major

transmission reinforcement was built for the Northeast Pocono region. There has been substantial load growth in this area since that time, which is expected to continue.

15. The current configuration of PPL Electric's transmission system in the Northeast Pocono Area consists of long transmission line lengths between regional substations. When service is interrupted on a long, heavily-loaded transmission line, the ability to restore the interrupted load from an alternate source is limited due to unacceptable low voltages that result at particular distribution substations when the load on one line is transferred to an adjacent line through abnormal sectionalizing. As a result, it is difficult in emergency situations to restore interrupted load through line transfers between regional sources. The transmission system in the Northeast Pocono area experiences these load transfer limitations during certain peak winter loading periods.

16. Using its transmission system planning process, PPL Electric projects that the following outages would result in violations of the system planning and reliability guidelines set forth in PPL Electric's Reliability Principles and Practices ("RP&P") if the system serving the Northeast Pocono area is not reinforced: (1) a double-circuit outage of the Blooming Grove-Jackson and Peckville-Jackson 138/69 kV Transmission Line; (2) a single-circuit outage of the Peckville-Jackson 138/69 kV circuit; (3) a single-circuit outage of the Blooming Grove-Jackson 138/69 kV circuit; (4) a double-circuit outage of the Palmerton-Wagners #1 & #2 138/69 kV Transmission Line; and (5) a single-circuit outage of the East Palmerton-Wagners #2 138/69 kV circuit.

17. PPL Electric's planning studies also project that, by the winter of 2015-2016, the normal line loading on the Blooming Grove-Jackson 138/69 kV circuit and Peckville-Jackson

138/69 kV circuit will exceed the normal line loading guideline set forth in the RP&P. This will limit PPL Electric's ability to restore load from the interruption of a neighboring circuit.

18. In addition, PPL Electric's planning studies identified that, by 2026-2027, the loss of one of the transformers at the Jackson 138-69 kV Substation could overload the remaining transformer in violation of the RP&P.

19. These violations are expected because the existing transmission system in the Northeast Pocono area does not have sufficient capacity to restore load interrupted under contingency situations within acceptable limits as specified within the RP&P guidelines. Given the load growth in the area, PPL Electric anticipates that the severity of each violation will continue to increase each year if the transmission system serving the Northeast Pocono area is not reinforced.

20. A further description of PPL Electric's transmission planning process, the identified violations, and the need for the Northeast-Pocono Reliability Project is provided in Attachment 2 to the Siting Application and is explained in the direct testimony of Ms. Krizenoskas, PPL Electric Statement No. 2.

III. DESCRIPTION OF THE PROPOSED PROJECT

21. The Northeast Pocono Reliability Project is required to resolve the above-described violations of the RP&P and to reinforce the 69 kV systems serving the Northeast Pocono region by bringing a new 230 kV supply source closer to the growing load centers. To accomplish this, PPL Electric proposes to locate the new West Pocono and North Pocono 230-69 kV Substations central to the load they will serve.

22. The two new Substations and associated new transmission lines will reduce the distance between the supply of power and the homes and businesses that use the electricity. This

proposed arrangement also will provide an alternate source of power to the Northeast Pocono region in the event that the normal sources are interrupted, which will improve power restoration times and provide operating flexibility and improved reliability for customers in the region. The Northeast-Pocono Reliability Project will reduce the number of customers affected by a single facility outage, as well as the duration of the outage.

23. The new West Pocono and North Pocono 230-69 kV Substations will be connected to the existing 230 kV transmission systems by a new 58-mile 230 kV transmission line. PPL Electric also proposes to construct five new 138/69 kV transmission lines, collectively approximately 11.3 miles, to connect the new North Pocono and West Pocono 230-69 kV Substations to the existing local 138/69 kV transmission systems. Without this transmission work, the new West Pocono and North Pocono 230-69 kV Substations cannot be placed in service.

24. PPL Electric undertook an extensive, multi-faceted siting study to determine the preferred routes for the transmission lines associated with the Northeast-Pocono Reliability Project. The siting study process was executed independently for each of the proposed 230 kV and 138/69 kV transmission line segments of the Northeast-Pocono Reliability Project. The preferred routes were selected after quantitative and qualitative comparisons of the available alternative routes. Based on these evaluation processes, the Siting Team chose the preferred routes for transmission lines associated with the Northeast-Pocono Reliability Project.

25. A detailed explanation of the selection of the siting analysis and selection of the preferred routes is provided in Attachment 4 to the Northeast-Pocono Siting Application and explained in the direct testimony of Mr. Baker, PPL Electric Statement No. 4.

IV. HEALTH AND SAFETY

26. The proposed Northeast-Pocono Reliability Project will not create any unreasonable risk of danger to the public health or safety. The above-described transmission work for the Northeast-Pocono Reliability Project 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.

27. The engineering description of the Northeast Pocono Project is provided in Attachment 5 to the Northeast-Pocono Siting Application and is explained in direct testimony of Mr. Supinski, PPL Electric Statement No. 5. Descriptions of the NESC standards, PPL Electric’s design criteria, and PPL Electric’s safety practices are provided in Attachment 13 to the Northeast-Pocono Siting Application.

28. Attachment 11 accompanying the Northeast-Pocono Siting Application explains PPL Electric’s standards for Magnetic Field Management. As explained therein, PPL Electric will construct the proposed 230 kV and 138/69 kV transmission lines for conductor-to-ground clearances that are a minimum of five feet higher than the required NESC minimum conductor-to-ground clearance for 230 kV and 138/69 kV lines. The implementation of additional modifications will be considered, provided those modifications can be made at low or now cost.

29. The new Jenkins-West Pocono, West Pocono-North Pocono, and North-Pocono-Paupack 230 kV Transmission Lines will each be designed for 230 kV double circuit capability, but initially only one 230 kV circuit will be installed until load growth in the area makes it appropriate to add the second 230 kV circuit. Therefore, reverse phasing cannot be accomplished on the proposed new 230 kV transmission lines at this time. Reverse phasing of the 230 kV transmission lines will be evaluated when a second circuit is added.

30. The new double circuit 138/69 kV lines connected to the new West Pocono and North Pocono 230-69 kV Substations will be designed to be reverse phased.

31. The new 138/69kV initial single/future double circuit lines connected to North Pocono 230-69 kV Substation will not be reverse phased. Since each of these lines are to be constructed as single circuit; reverse phasing at this time is not feasible. Where it is feasible to do so at low or no cost, PPL Electric will select a phasing arrangement for these lines that lowers the magnetic field. In the future, when a second circuit is added to these lines, PPL Electric will select the best circuit/phase arrangement to reduce the magnetic field where it is feasible to do so at low or no cost.

V. PROPERTIES FOR WHICH CONDEMNATION IS SOUGHT

32. A portion of the selected route for the Northeast-Pocono Reliability Project crosses a certain tract of land, the legal description of which is provided in PPL Electric Exhibit No. CK-J Butler-2. However, PPL Electric has been unable to acquire the proposed a right-of-way and easement for the proposed line through negotiations with the property owner. Accordingly, PPL Electric herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through PPL Electric's proposed exercise of the power of eminent domain for the Northeast-Pocono Reliability Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

33. The name and post office address of the owners of said land are: James L & Michaelene J Butler, 9414 South Gary Avenue, Tulsa, OK 74137.

34. PPL Electric has attempted to purchase a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner.

35. PPL Electric desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of the proposed segment of line for the transmission of electric energy for light, heat, and power. A legal description of the property over which PPL Electric proposes to acquire a right-of-way and easement is provided in PPL Electric Exhibit No. CK-J Butler-3. A copy of the plan showing the tract of land subject to the proposed right-of-way and easement is provided in PPL Electric Exhibit No. CK-J Butler-4.

36. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

VI. THE REQUIREMENTS FOR CONDEMNATION HAVE BEEN SATISFIED

37. No other public utility is now furnishing or has the corporate authority and certificate to furnish the same service as, or service similar to, that which PPL Electric will furnish by means of the transmission line to be constructed in the proposed right-of-way and easement over the land to be acquired as set forth in this Application.

38. The service to be furnished by PPL Electric through the proposed transmission line and related facilities is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in this Application and in the Northeast-Pocono Reliability Project Siting Application filed contemporaneously herewith.

39. Appropriate resolutions were adopted by PPL Electric's Board of Directors authorizing and directing this Application. A copy of the applicable resolutions is provided in PPL Electric Exhibit No. CK-J Butler-5 and is made a part hereof.

VII. CONSOLIDATION OF RELATED PROCEEDINGS

40. On December 28, 2012, PPL Electric filed the Northeast-Pocono Reliability Project Siting Application, which was docketed with the Commission at Docket No. A-2012-2340872. Therein, PPL Electric is requesting approval to site and construct the Northeast-Pocono Reliability Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for Northeast-Pocono Reliability Project are interrelated with this Application.

41. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), PPL Electric is serving a complete copy of the Northeast-Pocono Reliability Project Siting Application, together with the accompanying Attachments and Testimony, upon James L. & Michaelene J. Butler, who owns the property that PPL Electric seeks to acquire by the exercise of the power of eminent domain.

42. Also on December 28, 2012, PPL Electric separately filed two Zoning Petitions, at Docket Nos. P-2012-2340871 and P-2012-2341105, requesting findings that the buildings to shelter control equipment at the proposed North Pocono 230-69 kV Substation in Covington Township, Lackawanna County and proposed West Pocono 230-69 kV Substation in Buck Township, Luzerne County are reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance pursuant to 52 Pa. Code § 5.41 and 53 P.S. § 10619. Both the North Pocono and West Pocono Substations are required for the Northeast Pocono Project. Issues related to these Zoning Petitions are interrelated with this Application.

43. Finally, in addition to this Application, PPL Electric also is separately filling 36 other Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), for findings and determinations that the service to be furnished through its proposed exercise of the power of

eminent domain to acquire rights-of-way and easements over certain tracts of land for the proposed Northeast-Pocono Reliability Project is necessary or proper for the service, accommodation, convenience, or safety of the public. Issues relating to the need for these condemnations are interrelated with this Application.


44. Pursuant to 52 Pa. Code § 57.75(i)(1), PPL Electric requests that these related proceedings be consolidated for purposes of hearings, if necessary, and decision.

VIII. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the Northeast-Pocono Reliability Project Siting Application, North Pocono Zoning Petition, West Pocono Zoning Petition, and the 36 other Condemnation Applications contemporaneously filed herewith; and (2) find and determine that the service to be furnished by PPL Electric Utilities Corporation through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Respectfully submitted,

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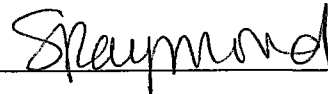
Attorneys for PPL Electric Utilities Corporation

VERIFICATION

I, Stephanie Raymond , being the Vice President 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: _____

1/14/13



Stephanie Raymond