

**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        :  
Respect To The Long Pond #1 and #2            :  
138/69 kV Tap Line In Tobyhanna               :  
Township, Monroe County, Pennsylvania       :

Docket No. A-2013-\_\_\_\_\_

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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 siting and construction of the Long Pond #1 and #2 138/69 kV Transmission Tap Line (“Long Pond Tap Line”) in Tobyhanna Township, Monroe County, Pennsylvania. The Tap Line is being constructed in order to supply the planned Long Pond 69-12 kV Substation (“Long Pond substation”). The Project, including the Tap Line, the Substation and related distribution line work, is required to meet the increasing demand for electricity and improve reliability of service in the Tobyhanna Township area of Monroe County. PPL Electric has discussed the Project with officials from Tobyhanna Township and Monroe County, and they did not oppose the Project. Subject to the Commission’s approval, construction on the Project is scheduled to begin in February 2014 in order to meet the Project’s in-service date of November 2014. In support of this Letter of Notification, 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  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Voice: 215.587.1197  
Fax: 215.320.4879  
E-mail: dmacgregor@postschell.com

John H. Isom (Pa. Bar I.D. # 16569)  
Jessica R. Rogers (Pa. Bar I.D. # 309842)  
Post & Schell, P.C.  
17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
Voice: 717.612.6032  
Fax: 717.731.1985  
E-mail: jisom@postschell.com  
E-mail: jrogers@postschell.com

Paul E. Russell (Pa. 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

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 those terms are defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803, respectively.

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 1-7, which provide additional information about the proposed Long Pond 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 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).

8. The Long Pond Tap Line is required to meet the increasing demand for electricity and improve reliability and operating flexibility in the Tobyhanna Township, Monroe County area.

9. The construction proposed in this Letter of Notification will extend approximately 650 feet from the existing Lake Naomi 138/69 kV Tap Line to the new Long Pond 69-12 kV Substation.

10. The total estimated cost of the proposed Project is approximately \$2.95 million. This amount includes approximately \$460,000 for the transmission line and approximately \$2.49 million for the substation and distribution work associated with the Project.

11. Construction is scheduled to begin in February, 2014 to support the Project's in-service date of November, 2014.

## **II. THE PROJECT**

12. The Long Pond Tap Line is located in Tobyhanna Township, Monroe 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.

13. The Long Pond Tap Line will require the construction of approximately 650 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 Long Pond Tap Line is provided as Attachment 1 accompanying this Letter of Notification. The Project is being undertaken in order to serve the planned Long Pond 69-12 kV Substation. As explained in the Necessity Statement, this Project addresses service issues identified using 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 presently is served from the Lake Naomi 69-12 kV, Mount Pocono 69-12 kV and Wagners 69-12 kV Substations via 12 kV distribution lines. The associated 12 kV distribution lines, which currently serve the area, include the Wagners 68-1, Mount Pocono 64-6, and the Lake Naomi 86-1, 86-2, and 86-4 distribution lines. These 12 kV lines serve over 7,500 customers in the Tobyhanna Township area.

17. PPL Electric has identified six separate issues in the Tobyhanna Township, Monroe County area that will be resolved or improved by the proposed Project.

a. First, peak load on the Wagners 68-1 distribution line is projected to exceed the normal planning guidelines based on PPL Electric's RP&P. The existing Wagners 68-1 12 kV distribution line uses 336 aluminum conductors. The planning guideline for this

type of conductor is 10,000 kVA (kilovolt Ampere). The 2013-2014 winter peak load is projected to be 11,300 kVA. Overloading the Wagners 68-1 12 kV line could result in conductor damage or failure which would interrupt service to approximately 1,650 customers until repairs could be completed. As a result, the existing distribution line cannot accommodate future load growth in the area.

b. Second, the peak load on the Lake Naomi 86-1 distribution line is projected to exceed the normal planning guidelines based on PPL Electric's RP&P. The existing Lake Naomi 86-1 12 kV distribution line uses 477 aluminum conductors. The planning guideline for such conductors is 11,000 kVA. The 2013-2014 winter peak load is projected to be 11,900 kVA. Overloading the Lake Naomi 86-1 12 kV line could result in conductor damage or failure which would interrupt service to approximately 1,200 customers until repairs could be completed. As a result, the existing distribution line cannot accommodate future load growth in the area.

c. Third, the peak load on the Lake Naomi 86-2 distribution line is projected to exceed the normal planning guidelines based on PPL Electric's RP&P. The existing Lake Naomi 86-2 12 kV distribution line uses 477 aluminum conductors. The planning guideline for such conductors is 11,000 kVA. The winter 2014 peak load is projected to be 11,300 kVA. Overloading the Lake Naomi 86-2 12 kV line could result in conductor damage or failure which would interrupt service to approximately 1,950 customers until repairs could be completed. As a result, the existing distribution line cannot accommodate future load growth in the area.

d. Fourth, the peak load on the Lake Naomi 86-4 distribution line is projected to exceed the normal planning guidelines based on PPL Electric's RP&P. The existing

Lake Naomi 86-4 12 kV distribution line uses 477 aluminum conductors. The planning guideline for such conductors is 11,000 kVA. The 2013-2014 winter peak load is projected to be 11,100 kVA. Overloading the Lake Naomi 86-4 12 kV line could result in conductor damage or failure which would interrupt service to approximately 2,100 customers until repairs could be completed. As a result, the existing distribution line cannot accommodate future load growth in the area.

e. Fifth, the existing Wagners 68-1, Lake Naomi 86-2, and 86-4 distribution lines exceed PPL Electric's RP&P guidelines for customer count per line. The RP&P guideline provides that no more than 1,300 customers should be served from a 12 kV circuit. Presently these three circuits serve approximately 1,650, 1,950, and 2,100 customers, respectively.

f. Sixth, due to heavy loading of the distribution lines, the existing system configuration has limited capability to transfer load to the adjoining distribution lines so that service is not interrupted during scheduled outages for maintenance and unscheduled outages. Therefore, if one of the existing distribution lines were to fail or require maintenance, customers could not be served from a different distribution line. Consequently, they would be without service until the work could be completed.

18. In order to resolve the issues discussed above, PPL Electric seeks to construct the Long Pond Tap Line and the Long Pond Substation. In addition, two new 12 kV distribution lines will be constructed from the new substation to serve customer load in the area. These system additions will relieve loading and increase reliability and operating flexibility. The new Long Pond 69-12 kV Substation will serve approximately 2,830 customers and 11.8 MVA of load. The new lines will reduce the number of customers served per line. As an additional

benefit, the new lines will also reduce the circuit length of the distribution lines in the area. The system additions, and the accompanying reductions in number of customers per circuit and circuit length, will reduce the customers' exposure to outages and reduce the number of customers affected by an outage.

19. One of the new 12 kV distribution lines will serve part of the load currently being supplied by the Lake Naomi 86-2 distribution line. The other new 12 kV distribution line will serve part of the load currently being supplied by the Lake Naomi 86-4 distribution line. This reinforcement Project will reduce peak loading on the Lake Naomi 86-2 and 86-4 distribution line by 7,300 and 4,500 kVA, respectively. These reductions will allow load to be transferred from the Wagners 68-1 and Lake Naomi 86-1 distribution lines to the Lake Naomi 86-2 and 86-4 distribution lines. In addition, the new facilities will also reduce the customer counts on the new and existing distribution lines so that they are closer to the RP&P guidelines. The table on page 5 of the Necessity Statement, Attachment 1 hereto, shows the projected 2013-2014 winter loads and customer counts before and after the completion of the Long Pond 69-12 kV Substation, the Long Pond Tap Line and related distribution facilities.

20. A total of five existing distribution lines, providing service to approximately 7,500 PPL Electric customers, will gain transfer capability upon the completion of the new Long Pond Tap Line and Long Pond Substation. The added transfer capability provided by the two new Long Pond distribution lines will help improve reliability for these customers through significant reductions in their outage durations. That is, if an outage were to occur on one of the five existing lines, the customers on that line could be transferred to the four remaining lines, rather than having to wait until the line is fully repaired.

21. The Long Pond Tap Line will be constructed on two separate parcels of land. PPL Electric requires a small section of new 100 foot wide right-of-way on one of the parcels to construct the Project. The property owner has signed a right-of-way agreement conveying the required easement to PPL Electric. The second parcel of land on which a portion of the Long Pond Tap Line and Substation will be constructed is owned in fee by PPL Electric.

22. The proposed Long Pond Tap Line will involve the installation of a total of six steel structures and the removal of three wood pole structures. One new structure will be a direct embedded high tap pole structure, approximately 97 feet in height; guy anchors will be installed to support this structure. This structure will replace an existing wood pole. The two additional wood pole structures, one on each side of the high tap pole structure, will be replaced in approximately the same location with direct embedded steel poles which will be approximately 70 feet in height. In addition, a direct embedded steel pole, approximately 70 feet in height for a load sectionalizing air break switch, will be constructed. The remaining two structures will be direct embedded single steel poles approximately 79 feet in height.<sup>1</sup> They will be supported by guy wires.

23. The Long Pond Tap Line will initially contain three power conductors and one optic overhead ground wire (“OPGW”). The power conductors will be 556.5 kcmil,<sup>2</sup> 24/7 strand aluminum conductor steel reinforced. A 0.567 inch OPGW will provide lightning protection for the proposed tap line and communications to the substations. 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.

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<sup>1</sup> The design of the Long Pond Tap Line described in this Letter of Notification is preliminary, and the final design may differ from the preliminary design.

<sup>2</sup> 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 mm<sup>2</sup>.

24. The estimated cost to design and construct the transmission portion of this Project is approximately \$460,000.

25. Subject to the Commission's approval, construction is scheduled to begin in February 2014, in order to support the Project's scheduled in-service date of November 2014.

26. An alternative to building the new substation and transmission line would be to build two new 12 kV distribution line and terminals from the Lake Naomi substation in order to relieve the Wagners 68-1, Lake Naomi 86-1, 86-2, and 86-4 lines. This alternative would require one of the new 12 kV distribution lines to follow the same line route as the Lake Naomi 86-4 distribution line for about two miles. The other new 12 kV distribution line would follow the same line route as the Lake Naomi 86-2 distribution line for about three miles. This alternative would improve reliability less than the preferred Project, due to fact that two distribution circuits installed on the same poles are susceptible outages on both lines from the same cause. Upgrades to the Lake Naomi Substation would also be necessary to accommodate the additional lines and terminals.

27. PPL Electric rejected this alternative because the preferred alternative described above, will be more cost effective, will provide greater reliability and will provide greater operating flexibility. The preferred alternative will produce a better system to serve the entire area in the long term.

28. The Engineering Description of the proposed construction of the Long Pond Tap Line is provided in Attachment 2 accompanying this Letter of Notification.

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

29. The Long Pond Tap Line will not create any unreasonable 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 National Electric Safe Code (“NESC”) minimum standards and meet all applicable legal requirements. Descriptions of NESC standards, PPL Electric’s design criteria, and PPL Electric’s safety practices are provided in Attachment 4.

30. 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.

31. 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 levels, the program generally prescribes a line design with ground clearances five feet greater than NESC standards and reverse phasing of new double-circuit lines where it is feasible to do so at low or no cost and consistent with functional requirements.

32. Consistent with the program, PPL Electric will construct the new overhead line with ground clearances five feet greater 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**

33. The proposed tap line is located on two separate parcels of land in Tobyhanna Township, Monroe County. One property is a 20 acre parcel owned in fee by PPL Electric. This parcel will contain the proposed Long Pond Substation and a portion of the proposed tap line.

The other property is an abandoned railroad corridor which contains an existing PPL Electric right-of-way and is traversed by the existing Lake Naomi 138/69 kV Tap Line, which will be renamed the Jackson-Wagners 138/69 kV Line as a result of a separate Project currently pending before the Commission. The existing Lake Naomi Tap will be the electrical source for the proposed Long Pond Tap Line and Substation. The properties which will contain the proposed tap and substation are mostly wooded, with the exception of the existing transmission line right-of-way, and are within the Low-Density Residential Zoning District. No residences, however, abut the right-of-way in which the Long Pond Tap Line will be constructed. Incremental land use impacts are anticipated to be minimal because the Project is located in an area that already contains existing PPL Electric facilities.

34. No communication towers, pipelines or other utilities will be affected by the proposed construction. Pocono Mountains Municipal Airport is located approximately 2.7 miles north of the Project area. PPL Electric does not anticipate any interference with airport operations because there are already existing transmission structures in the Project area. 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 tap line will not be a hazard to the airport's flight operations.

35. The proposed construction of the Long Pond Tap Line was reviewed by the Pennsylvania Historical and Museum Commission ("PHMC"). The PHMC has determined that there are no National Register eligible or listed historic or archaeological properties in the area.<sup>3</sup> Therefore, no impacts to such resources are anticipated, and no further investigations are required.

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<sup>3</sup> File No. ER 2012-0743-089-A.

36. The Project will not affect any unique geological, scenic, or natural areas. The recreational area located closest to the Project is State Game Lands (SGL) 127, which is located approximately 2 miles north of the Project. No impacts to these features are anticipated due to the distance from the Project area and the extensive development between the Project area and the features.

37. Tree clearing is required, and in order to minimize environmental impacts of the clearing, PPL Electric will apply its “Specifications for Initial Clearing and Control of Vegetation on or Adjacent to Electric Line Right-of-Way through Use of Herbicides, Mechanical, and Hand Clearing Techniques.”

38. The transmission tap line will not cross any wetlands or areas designated as “Waters of the U.S.” or “Waters of the Commonwealth.” PPL Electric will obtain all necessary permits 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 erosion and sedimentation control permits and will comply with all conditions placed on those permits.

39. PPL Electric has coordinated with state and federal agencies to obtain information regarding threatened and endangered species in close proximity to the Project area. A review of the Pennsylvania Natural Diversity Inventory (PNDI) records indicates that no impacts to threatened and endangered species and/or special concern species and resources are anticipated.<sup>4</sup>

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<sup>4</sup> PNDI Search ID: 2012031334361.

**V. NOTICE**

40. The proposed construction of the Project, including the Long Pond Tap Line, was reviewed with representatives of Tobyhanna Township and Monroe County. The Township and the County had no objection to the Project.

41. 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).

**VI. LETTER OF NOTIFICATION**

42. 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 Long Pond Tap Line qualifies for use of a Letter of Notification because the Long Pond Tap Line will be less than two miles in length.

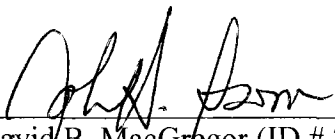
43. This Letter of Notification is being filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the proposed construction of the Long Pond 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 Long Pond #1 and #2 138/69 kV Tap Line in Tobyhanna Township, Monroe County, Pennsylvania, that is explained above and in the Attachments hereto.

Respectfully submitted,

Paul E. Russell (ID # 21643)  
Associate General Counsel  
PPL Services Corporation  
Office of General Counsel  
Two North Ninth Street  
Allentown, PA 18106  
Phone: 610-774-4254  
Fax: 610-774-6726  
E-mail: perussell@pplweb.com

  
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David B. MacGregor (ID # 28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Phone: 215-587-1197  
Fax: 215-320-4879  
E-mail: dmacgregor@postschell.com

John H. Isom (ID # 16569)  
Jessica R. Rogers (ID #309842)  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
Phone: 717-731-1970  
Fax: 717-731-1985  
E-mail: jisom@postschell.com  
E-mail: jrogers@postschell.com

Of Counsel:

Post & Schell, P.C.

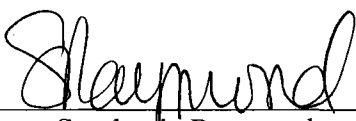
Date: February 12, 2013

Attorneys for PPL Electric Utilities Corporation

## 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: 2/7/13

  
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Stephanie Raymond