

**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 : Docket No. A-2013-\_\_\_\_\_  
Respect To The Construction of the Eldred :  
– Rausch Creek 138 kV Transmission Line :  
In Eldred, Barry, Hegins and Frailey :  
Townships, Schuylkill 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 siting and construction of the Eldred – Rausch Creek 138 kV Transmission Line (“Eldred – Rausch Creek Line”) in Eldred, Hegins, Barry and Frailey Townships, Schuylkill County, Pennsylvania. The proposed Eldred – Rausch Creek Line will be approximately 6.5 miles in length. More than 98 percent of the proposed Eldred – Rausch Creek Line will be constructed by attaching arms, insulators and conductors to existing structures which presently support the Eldred – Pine Grove 69 kV Transmission Line (“Eldred – Pine Grove Line”). The purpose of the Eldred – Rausch Creek Line is to connect the proposed Rausch Creek Wind Farm to the PPL Electric transmission system at the existing Eldred 230-69 kV Substation so that electricity generated at the Rausch Creek Wind Farm can be delivered to

end-users of electricity. The overall Project includes modifications to the Eldred 230 – 69 kV Substation and the construction of the Eldred – Rausch Creek Line. PPL Electric has reviewed the Project with representatives of Eldred, Hegins, Barry and Frailey townships and representatives of Schuylkill County, and they had no opposition to the Project. Subject to the Commission’s approval, construction is scheduled to begin in October 2013 to support the wind farm developer’s schedule. The Eldred – Rausch Creek Line will be constructed on land owned in fee by PPL Electric, in existing rights-of-way owned by PPL Electric for the Eldred – Pine Grove Line and on land owned by the Rausch Creek Wind Farm. 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:

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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 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 Eldred - Rausch Creek 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).

## **II. THE PROJECT**

8. The construction proposed in this Letter of Notification will extend approximately 6.5 miles between the existing Eldred 230-69 kV Substation and the Rausch Creek Wind Farm's dead-end structure located in the proposed Rausch Creek Wind Farm 12-138 kV Substation.

9. The total estimated cost of the proposed Project is approximately \$13 million. This total includes \$5.5 million for the transmission line and \$7.5 million for the substation work. The entire cost of the Project will be borne by BP Wind Energy, the owner of the Rausch Creek Wind Farm.

10. Subject to the Commission's approval, construction is scheduled to begin in October, 2013 to support the developer's schedule.

11. The Eldred - Rausch Creek Line will be located in Eldred, Hegins, Barry and Frailey Townships, Schuylkill 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.

12. The construction of the Eldred - Rausch Creek Line will make substantial use of existing structures for the Eldred – Pine Grove Line. The majority of the Project involves the addition of a second circuit to the open side of a section of the existing Eldred – Pine Grove 69 kV Transmission Line (see Figures 1 and 2). The existing Eldred – Pine Grove 69 kV Transmission Line was constructed on structures that are designed to accommodate a second 69 kV circuit. Although the Eldred – Pine Grove 69 kV Transmission Line was designed for 69 kV operations, it can host a 138 kV transmission line. The existing structures can support a 138 kV line so long as longer arms are installed (7 and 11 feet instead of 6 and 10 feet) and different, higher rated insulators are utilized. The modifications to install 138 kV conductors meet all applicable National Electric Safety Code (NESC) standards. The new line will be designed, constructed and operated at 138 kV. See Figure 2 on page 1-5 of the Necessity Statement, Attachment 1 hereto, for the proposed transmission system configuration.

13. Short lengths of the Eldred – Rausch Creek Line, one at each end, will diverge from the structures for the Eldred – Pine Grove Line. In order to connect to the existing Eldred Substation, PPL Electric will construct approximately 500 feet of new underground transmission line within PPL Electric’s existing right-of-way and land PPL Electric owns for the Eldred Substation. In this area, the structures for the Eldred – Pine Grove Line cannot be used because the existing Eldred – Pine Grove structures already carry two 69 kV circuits, and there is not space for a third circuit.

14. At the Rausch Creek Wind Farm, The line will diverge from the existing Eldred – Pine Grove Transmission Line for approximately 125 feet. This 125-foot section of the proposed line will be placed on new structures and connect into the Rausch Creek Wind Farm 12-138 kV Substation. This section will require the installation of approximately two new steel monopoles approximately 90 feet in height. These structures will be constructed on concrete foundations. See Figure 3 to the Engineering Description, Attachment 2 hereto.

15. The new circuit will consist of three power conductors. The power conductors will primarily consist of 556.5 thousand circular mills (kcmil),<sup>1</sup> 24/7 stranding, aluminum conductor steel reinforced (ACSR). Three spans of the line, however, will utilize 795 kcmil, 24/7 stranding, ACSR to limit conductor blowout. No new ground wire will be added.<sup>2</sup>

16. The Necessity Statement for the proposed construction of the Eldred - Rausch Creek Line is provided as Attachment 1 to this Letter of Notification. The purpose of the Eldred – Rausch Creek Line is to connect the Rausch Creek Wind Farm to the PPL Electric transmission system, which is part of the PJM Interconnection, so that electricity generated at the Wind Farm can be delivered to end-users of electricity. No alternative type of project can provide the needed electrical path from the Rausch Creek Wind Farm 12-138 kV Substation to the regional transmission system.

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

17. The Eldred - Rausch Creek 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

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<sup>1</sup> 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 (0.001) of an inch.

<sup>2</sup> The design for the Eldred – Rausch Creek is in its preliminary stage. The final design may differ somewhat from the design described herein.

(“NESC”) minimum standards and meets all applicable legal requirements. Descriptions of NESC standards, PPL Electric’s design criteria, and PPL Electric’s safety practices are provided in Attachments 2 and 4.

18. 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 does not interfere with functional requirements.

19. 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 the policy decision. To reduce magnetic field levels, the program generally prescribes a line design with ground clearances at least 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 will not interfere with functional requirements.

20. Consistent with the program, PPL Electric will construct the new overhead line with ground clearances at least five feet greater than NESC standards to reduce magnetic field exposures. In addition, the Eldred – Rausch – Creek Line and the Eldred – Pine Grove Line will be reversed phased, further reducing magnetic fields.

#### **IV. ENVIRONMENTAL EVALUATION**

21. PPL Electric is requesting PUC approval to install approximately 6.5 miles of new overhead 138 kV circuit to existing transmission structures capable of double-circuit operation, which presently carry the Eldred – Pine Grove 69 kV Transmission Line. In addition, PPL Electric intends to construct a short section of new overhead line that will connect the

Rausch Creek Wind Farm to the existing transmission structures, and another short section of new underground line that will extend the new Eldred – Rausch Creek Line into PPL Electric’s Eldred Substation.

22. The entire Project is located within Schuylkill County, Pennsylvania. The proposed line begins at the existing PPL Electric Eldred Substation located in Eldred Township, continues south for approximately 6.5 miles through Barry and Hegins townships, and terminates at the proposed Rausch Creek Wind Farm located in Frailey Township. Table 1 identifies the portion of the Project located within each township.

**TABLE 1  
MUNICIPALITIES CROSSED BY THE  
PROJECT**

<u>Municipality</u>	<u>Length (miles)<sup>3</sup></u>
Frailey Township	0.1
Hegins Township	2.6
Barry Township	3.6
Eldred Township	0.3

23. The proposed Project was reviewed with representatives of Schuylkill County and Frailey, Hegins, Barry, and Eldred townships, and neither the County nor the townships had any objection to the Project. A list of involved governmental agencies, municipalities, and other public entities is presented in Attachment 7.

**A. LAND USE**

24. The Project will have little, if any, effect on land use in the area. The Project begins in Eldred Township at the existing Eldred Substation located adjacent to Taylorsville Road and west of Weiser State Forest. The first approximately 500 feet, including 200 feet through Weiser State Forest, will be constructed underground. From this point, the new

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<sup>3</sup> Rounded to the nearest tenth



overhead 138 kV circuit will primarily be constructed on existing transmission structures that presently carry the Eldred – Pine Grove 69 kV Transmission Line within PPL Electric’s existing right-of-way.

25. The existing transmission line turns southeast for approximately 832 feet through Weiser State Forest before turning south and crossing Taylorsville Road and the Eldred – Wheelabrator Frackville Energy 230 kV Transmission Line in Barry Township. The route continues south for approximately 1.1 miles through a forested portion of Barry Township.

26. At a point approximately 612 feet north of Mabel Road, the existing transmission line turns southwest and traverses through a mix of rural residential, agricultural, and forested land through Barry and Hegins townships for approximately 3.0 miles. The route then turns southeast and traverses forested and agricultural land through Hegins and Frailey townships for approximately 2.1 miles. From this point, PPL Electric has an agreement in principle to acquire approximately 125 feet of new, 100 foot-wide right-of-way from BP Wind Energy, who owns the proposed Rausch Creek Wind Farm, in order to connect the new Eldred – Rausch Creek Line to the wind farm substation, which is located north of Interstate 81, approximately 1,200 feet south of Fountain Mountain Road.

27. With the exception of the first 125-foot segment connecting the wind farm generator to the 138 kV circuit, the proposed Project will be located entirely within the existing right-of-way for the Eldred – Pine Grove 69 kV Transmission Line or land owned by PPL Electric for the Eldred Substation. Addition of the new 138 kV circuit to the existing structures and the minimal amount of new construction at the Project endpoints is not expected to result in significant land use impacts. Other than the clearing of a minimal amount of trees along the short 125-foot new line segment entering the Rausch Creek Wind Farm, and approximately 0.5

acres of potential tree clearing between a new angled structure within Weiser State Forest and the Eldred Substation, no changes to existing land use are expected.

28. No communication towers, pipelines, or other utilities will be affected by the proposed Project. The closest airport is the Schuylkill County Airport, located approximately 2.8 miles northeast of the Project. PPL Electric will file the appropriate documentation with both the Federal Aviation Administration and the PennDOT Bureau of Aviation to ensure that the proposed construction will not be a hazard to the airport's flight operations. The proposed 138 kV Transmission Line will be installed on existing transmission structures and is not expected to impact airport operations.

#### **B. CULTURAL RESOURCES**

29. The Project will have little, if any, impact on cultural resources in the area. PPL Electric reviewed the Pennsylvania Historical and Museum Commission's (PHMC) Bureau for Historic Preservation (BHP) Cultural Resources Geographic Information System (CRGIS) to identify previously recorded historic resources located in the vicinity of the Project. Based on this review, the Project does not cross any recorded historic architectural or archeological resources. The closest previously recorded resource is located approximately 538 feet south of the existing transmission line and was determined to be ineligible for the National Register of Historic Places. No other previously recorded resources are located within 0.5 mile of the Project. PPL Electric submitted a letter to the PHMC on February 20, 2013 to request information on any additional archaeological or historic architectural resources located in the Project vicinity. No response has been received to date. Based on the results of the CRGIS database review, PPL Electric does not anticipate the need for further investigation for this

Project. PPL Electric, however, will complete consultation with the PHMC prior to the start of construction.

### C. NATURAL FEATURES

30. The Project will traverse approximately 0.2 of a mile of Weiser State Forest. On approximately 827 feet of this distance, construction will consist of installing a new overhead circuit on the existing Eldred – Pine Grove 69 kV transmission structures, and approximately 200 feet will involve construction of a new underground circuit. In both cases, the Project will be located within existing right-of-way. PPL Electric anticipates the need to install one new structure within Weiser State Forest. Minimal tree clearing will occur within the 200-foot segment of new construction through Weiser State Forest in order to accommodate the new 138 kV circuit. Clearing will be limited to the existing 100-foot right-of-way, which is not presently cleared to 100 feet. PPL Electric will apply its “Specification 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” to mitigate any impacts.

31. The closest natural area, identified in the natural area inventory (NAI) by The Nature Conservancy,<sup>4</sup> is referred to as the Good Spring Creek Woods. According to The Nature Conservancy, the area supports a fair-quality example of one plant species of concern, minniebush (*Menziesia pilosa*) and two animal species of concern, the Allegheny woodrat (*Neotoma magister*) and the timber rattlesnake (*Crotalus horridus*). This natural area is located approximately 0.9 mile to the south of the Project site. Based on the distance of the NAI from the Project, no impacts are anticipated. The Project will not traverse or affect any other unique geological, scenic or natural areas.

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<sup>4</sup> A Natural Areas Inventory of Schuylkill County, Pennsylvania, 2003.

32. The Project crosses two National Hydrography Dataset (NHD) streams: Pine Creek and Deep Creek. No National Wetland Inventory (NWI) wetlands are traversed by the Project. PPL Electric intends to conduct a wetland delineation of the transmission right-of-way, and will acquire all required environmental permits prior to the start of construction and adhere to all of their terms and conditions.

33. PPL Electric will obtain any required soil erosion and sedimentation control approvals and associated permits and will comply with any conditions placed on those permits. PPL Electric will employ its “Specification for Soil Erosion and Sedimentation Control on Transmission Line Rights-of-Way” as appropriate.

**D. THREATENED AND ENDANGERED SPECIES**

34. PPL Electric conducted an online Pennsylvania Natural Diversity Inventory (PNDI) database review on February 15, 2013. Based on this review, the Pennsylvania Game Commission (PGC), Pennsylvania Fish and Boat Commission (PFBC), the Pennsylvania Department of Conservation and Natural Resources (DCNR), and the U.S. Fish and Wildlife Service (USFWS) reported that the Project will not impact any threatened and endangered species and/or special concern species and resources are located within the Project area.<sup>5</sup> However, Schuylkill County is located within the range of the federally threatened bog turtle (*Clemmys muhlenbergii*). Therefore, PPL Electric will retain a qualified bog turtle surveyor to conduct a Phase I bog turtle survey for any wetlands delineated within the Project boundaries and will submit a Phase I survey report to USFWS.

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<sup>5</sup> Pennsylvania Natural Diversity Inventory (PNDI) Search ID: 20130215391337, February 15, 2013.

**V. NOTICE**

35. The proposed construction of the Eldred - Rausch Creek Line was reviewed with representatives of Eldred, Hegins, Barry and Frailey townships and representatives of Schuylkill County. The townships and the County had no objection to the Project.

36. 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) as well as on owners of land within the right-of-way for the Eldred – Rausch Creek Line, which are listed in Attachment 6.

**VI. LETTER OF NOTIFICATION**

37. 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 Eldred - Rausch Creek Line qualifies for use of a Letter of Notification because it will be located entirely on an existing transmission right-of-way, land owned in fee by PPL Electric or land owned by the Rausch Creek Wind Farm, the only customer who will be served through the Eldred – Rausch Creek Line and because the size, character design or configuration of the proposed HV line will not substantially alter the right-of-way.

38. More than 98 percent of the Eldred – Rausch Creek Line will be supported by existing structures for the Eldred – Pine Grove Line, which were constructed originally to support two transmission lines. For this portion of the Line, construction will consist of adding arms, insulators and conductors to the vacant side of the structures for the Eldred – Pine Grove Line.

39. The Eldred – Rausch Creek Line will require construction of only three new structures. Two of the new structures will be located on land owned by the customer, the Rausch Creek Wind Farm; the remaining new structure will be located in the Weiser State Forest.


40. 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 Eldred - Rausch Creek 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 Eldred – Rausch Creek 138 kV Transmission Line in Eldred, Hegins, Barry and Frailey townships, Schuylkill County, Pennsylvania, that is explained above and in the Attachments hereto.

Respectfully submitted,

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Date: April 15, 2013

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: 4/3/13

  
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Stephanie Raymond