

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities :  
Corporation Filed Pursuant to 52 Pa. Code :  
Chapter 57, Subchapter G, for Approval of the :     Docket No. A-2013-\_\_\_\_\_  
Siting and Reconstruction of the Double :  
Circuit 138/69 kV Lake Harmony – Lake :  
Naomi Transmission Line in Portions of :  
Coolbaugh, Pocono, and Tobyhanna :  
Townships, Monroe County and Kidder :  
Township, Carbon County, Pennsylvania

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**APPLICATION OF PPL ELECTRIC UTILITES CORPORATION**

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**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files, pursuant to 52 Pa. Code § 57.72, this Application requesting Pennsylvania Public Utility Commission (“Commission”) approval to site and reconstruct the Lake Harmony – Lake Naomi single circuit 69 kV transmission line as a double circuit 138/69 kV Transmission Line (“Project”) in order to improve service by resolving projected reliability violations of PPL Electric’s Reliability Principles and Practices (“RP&P”). The Project is located in portions of Coolbaugh, Pocono, and Tobyhanna townships, Monroe County and Kidder Township, Carbon County. The reliability violations are excessive load losses in the event of outages of certain other transmission facilities in the area. The purpose of the Project is to increase PPL Electric’s ability to restore service by transferring load in the event of outages of other transmission facilities. Upon the completion of this Project, together with the completion of another project

pending before the Commission,<sup>1</sup> PPL Electric will be able to restore service to all customers in a short period of time after an outage of the other transmission facilities.

The Project would rebuild the existing Lake Harmony – Lake Naomi 138/69 kV single circuit Transmission Line into a double circuit 138/69 kV Transmission Line. The Line is approximately 24 miles in length. The rebuilt Line will follow the route of the current Line in the current right-of-way for approximately 23 of its 24 miles or about 96 percent of its length. The purpose of the approximately one-mile reroute is to lessen environmental impacts and improve access and maintenance issues associated with the current location.

Subject to the Commission’s approval, construction is scheduled to begin by September, 2014 to meet the scheduled in service date of December 2016. The estimated cost to site, design and construct the Project is \$33.3 million.

PPL Electric has explained the Project to representatives of Coolbaugh, Pocono, and Tobyhanna townships, Monroe County and Kidder Township, Carbon County, as well as to representatives of Monroe and Carbon counties, and they did not object to the Project.

In support of this Application, PPL Electric states as follows:

**I. INTRODUCTION AND OVERVIEW**

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

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<sup>1</sup> The other Project is the Northeast Pocono Reliability Project which was filed on December 28, 2012 at Docket No. A-2012-2340872, *et al.*

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 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 Application in a separate three-ring binder are the following Attachments that provide additional detailed information regarding the Lake Harmony-Lake Naomi Rebuild Project:

- Executive Summary
- Attachment 1 Commission Regulation Cross-Reference Matrix
- Attachment 2 Necessity Statement
- Attachment 3 Environmental Setting
- Attachment 4 Alternatives and Siting Analysis
- Attachment 5 Engineering Description
- Attachment 6 Vegetation Management
- Attachment 7 List of Governmental Agencies, Municipalities, and other Public Entities Contacted
- Attachment 8 Property Owner List
- Attachment 9 List of Government Agencies, Municipalities, and other Public Entities Receiving a Copy of this Application
- Attachment 10 PPL Electric Design Criteria and Safety Practices
- Attachment 11 PPL Electric Magnetic Field Management Plan
- Attachment 12 Agency Coordination
- Attachment 13 Public Notice Filing Requirements
- Attachment 14 Agency Permit Requirements

7. This Application, including the accompanying Attachments, which are incorporated herein by reference, contains all of the information required by 52 Pa. Code §§ 57.72(c), 69.1101, 69.3102 – 69.3107.

## **II. NEED FOR THE PROJECT**

### **A. TRANSMISSION PLANNING**

8. System planning is the process which assures that transmission systems can supply electricity to all customer loads reliably and economically. The reliable and economical operation of transmission systems requires planning practices for system expansion and reinforcement. The PPL Electric reliability and planning practices are set forth in PPL Electric's RP&P, which was developed to ensure adequate and appropriate levels of electric service to its customers consistent with good utility practice.

9. In accordance with the RP&P, PPL Electric's transmission system is planned so that it can be operated at all projected load levels and during normal scheduled outages to withstand specific unscheduled contingencies without exceeding the equipment capability, causing system instability, cascade tripping, or voltage levels that exceed tolerances. The transmission system is required to have adequate capability so that it can be operated normally and can withstand certain unscheduled contingencies and other system conditions. A further description of PPL Electric's system planning process is provided in Attachment 2 to this Application, the Necessity Statement.

10. PJM Interconnection, L.L.C. ("PJM") is a Federal Energy Regulatory Commission ("FERC") approved Regional Transmission Organization charged with ensuring the reliability of the electric transmission system under its functional control and coordinating the movement of electricity in all or parts of thirteen states and the District of Columbia, including most of Pennsylvania. PPL Electric, an owner of transmission facilities in Pennsylvania, is a member of PJM and actively participates in the PJM transmission planning process.

11. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan ("RTEP") to ensure power continues to flow reliably to customers.

The North American Electric Reliability Corporation, PJM, and transmission owner reliability criteria are used by PJM and the transmission owners to analyze the system and determine if specific transmission upgrade projects are needed to ensure long-term reliable electric service to customers.

12. The PJM transmission system includes both the bulk electric system (“BES”) and the non-bulk electric system (“non-BES”). The BES is operated at voltages of 100 kV or higher. The non-BES is operated at less than 100 kV.

13. The local transmission operator, in this case PPL Electric, is responsible for identifying the reliability violations and correcting any violations to meet its own reliability and planning practices on its non-BES.

14. In order to meet this responsibility, PPL Electric undertakes an independent analysis of its non-BES transmission system facilities to ensure that these facilities meet the planning practices set forth in the RP&P. Based upon this analysis, PPL Electric determined that the proposed Lake Harmony – Lake Naomi Project is necessary to resolve violations of PPL Electric’s local planning criteria on the 69 kV system serving customers in Monroe and Carbon counties.

15. The Lake Harmony – Lake Naomi Project was presented before stakeholders at the Mid-Atlantic Sub-Regional RTEP meeting on June 2, 2010. The Mid-Atlantic Sub-Regional Committee recommended its approval to the PJM Board, which subsequently approved the Project and included it in the 2010 RTEP Report as baseline project b1203.

16. Once the PJM Board approves the RTEP that includes a transmission owner’s project such as the Lake Harmony – Lake Naomi Project, the transmission owner is obligated to

implement the project under the PJM Open Access Transmission Tariff and the operating agreements.

17. Attachment 2 to this Application contains a detailed description of PJM's RTEP transmission planning process and PPL Electric's transmission planning process. Attachment 2 also contains the analysis supporting the determination that the Lake Harmony – Lake Naomi Project is necessary to resolve projected violations of PPL Electric's RP&P.

**B. EXISTING SYSTEM**

18. The existing Lake Harmony – Lake Naomi Transmission consists of six segments and extends a total of 24.47 miles. The segments are as follows:

- 3.55 miles between the Lake Harmony 69-12 kV Substation and the Jack Frost 69-12 kV Substation,
- 2.72 miles between the Jack Frost 69-12 kV Substation and the Arrowhead Lake Tap Pole,
- 5.69 miles between the Arrowhead Lake Tap Pole and the Wagners 69-12 kV Substation,
- 7.52 miles from the Wagners 69-12 kV Substation to the Lake Naomi 69-12 kV Substation,
- 2.01 miles between the Lake Naomi 69-12 kV Substation and the proposed Long Pond 69-12 kV Substation, and
- 2.98 miles between the proposed Long Pond 69-12 kV Substation and the Lake Naomi Tap Pole.

19. Figure 2-1 to Attachment 2 to this Application is a one-line diagram which shows the functional arrangement of the existing transmission facilities in the area.

### C. THE PROBLEM

20. Due to increasing load growth in the area, transmission planning studies project, for 2014 and beyond, that the loss of the Jackson-Wagners #1 138/69 kV line would interrupt 57 MW of load which equates to approximately 9,500 customers. Transferring load from the Jackson Substation to the East Palmerton Substation would be limited due to the resulting low voltage at the end of the abnormally sectionalized (the changing of the normally open and normally closed points on a circuit in order to restore load during an outage or to transfer load during maintenance) East Palmerton-Wagners #1 circuit. In such an outage, the Power Dispatcher would be required to interrupt approximately 35 MW of load (approximately 6,400 customers) served by distribution substations at Wagners and Lake Naomi in order to restore 69 kV voltages along the line to acceptable levels. The RP&P states that the maximum allowable load loss is 30 MW for a single-circuit line outage.

21. If an outage were to occur on the East Palmerton-Wagners #1 & #2 138/69 kV double-circuit line, 105 MW of load initially would be interrupted. Transferring load from the East Palmerton Substation to the Jackson Substation would be limited due to the resulting low voltage at the end of the abnormally sectionalized Jackson-Wagners #1 circuit. The Power Dispatcher would have to interrupt customer load of 54 MW (approximately 15,200 customers), served by the Weissport, Beltzville, Carbon, Christmans, and Hickory Run 69-12 kV substations along with the customer owned Leighton Borough Substation in order to restore 69 kV voltage along the line to acceptable levels. The RP&P states that the maximum allowable load loss is 45 MW for a double-circuit line outage.

22. The need for the Project is confirmed by the fact that, during particular severe recent weather events which resulted in interrupted transmission facilities, a backup or alternate

transmission supply line would have enabled PPL Electric to restore more customer load in a shorter period of time.

23. The area served by the East Palmerton-Wagners #1 & #2 138/69 kV and Lake Naomi 138/69 Tap has experienced a significant population increase from 2000 to 2010. Carbon County has had an 11% increase and Monroe County has had a 22.5% increase in population during this time period. This trend shows that load has been growing significantly, and PJM projects a 1.1% annual future winter growth rate for the overall PPL zone. Improvements to the transmission facilities are necessary to maintain reliable service. Therefore, the violations of the RP&P explained above will worsen each year until the Project has been completed.

#### **D. THE PROPOSED SOLUTION**

24. Subject to the Commission's approval, in order to resolve the issues described above, PPL Electric proposes to rebuild the existing single circuit 138/69 kV Lake Harmony – Lake Naomi Transmission Line into a double-circuit 138/69 kV line. The Line extends from the existing Lake Harmony 69-12 kV Substation to the Lake Naomi Tap pole off the Blooming Grove-Jackson 138/69 kV line, a distance of approximately 24 miles. PPL Electric will design the new line to current 138 kV standards, but will initially operate the line at 69 kV. The operating voltage will be increased when load growth in the area makes it appropriate to do so.

25. The first four miles of the existing Peckville–Jackson and Blooming Grove–Jackson 138/69 kV Line heading north from the Jackson Substation will become part of the new Jackson-Wagners #1 & #2 138/69 kV circuits, respectively, which is the subject of a filing Docket No. A-2012-2304631. The Lake Naomi 138/69 kV Tap will become part of the circuit designated as the Jackson – Wagners #1 Line (the former Blooming Grove–Jackson 138/69 kV Line). The Jackson–Wagners #2 Line will utilize the existing 4 miles of 138/69 kV line of the former Peckville–Jackson 138/69 kV line. The Jackson – Wagners #1 & #2 138/69 kV circuits

will normally supply the future Long Pond 69-12 kV Substation, which is the subject of a filing Docket No. A-2013-2347931, and the existing Lake Naomi, Wagners, Arrowhead, Jack Frost, and Lake Harmony 69-12 kV substations.

26. The future Long Pond 69-12 kV Substation will tap the proposed Jackson – Wagner #1 circuit. The existing Lake Naomi and Wagners 69-12 kV substations will each have Tap #1 attached to the Jackson-Wagners #1 circuit and Tap #2 attached to the Jackson-Wagners #2 circuit. The Arrowhead Tap will be removed from its current tap location and re-attached to the new circuit designated as the East Palmerton-Wagners #2 138/69 kV circuit. The Jack Frost Tap will not be rearranged and will remain attached to the East Palmerton – Wagners #1 circuit. Lake Harmony Taps #1 & #2 will also not be rearranged. These Tap arrangements will minimize the need for transmission lines to physically cross over/underneath of each other as well as balance the load on the Jackson-Wagners #1 & #2 138/69 kV circuits at the Jackson Substation.

27. PPL Electric determined that this rebuild and configuration will resolve the two RP&P transmission violations in the area because the new double-circuit line will provide additional load transfer capability. After completion of the Project, an outage on the Jackson – Wagners #1 & #2 138/69 kV double-circuit line near the Jackson Substation will initially interrupt 90 MW (approximately 18,300 customers). Transferring load from the Jackson Substation to the East Palmerton Substation will allow all customer load to be restored while maintaining voltages within acceptable limits.

28. After this reinforcement Project, an outage on the East Palmerton – Wagners #1 & #2 138/69 kV double-circuit line near the East Palmerton Substation will initially interrupt 60

MW (approximately 16,000 customers). The Power Dispatcher, however, will be able to restore customer load to within the RP&P standard of 45 MW after a double circuit 69 kV line outage.

29. PPL Electric has proposed future transmission reinforcement plans for the area, which is the subject of the filing at Docket No. A-2012-2340872, including the West Pocono Substation and Jenkins - West Pocono 230 kV line, which together with this Project will allow for all customer load to be restored after loss of this double-circuit line. The new Jackson-Wagners #1 & #2 138/69 kV Line will maximize the effectiveness of the proposed future transmission expansion plans in this area.

30. Figure 2-2 to Attachment 2 to this Application shows the functional arrangement of the proposed transmission facilities in the area.

### **III. ENGINEERING DESCRIPTION OF THE PROPOSED TRANSMISSION LINE**

31. The proposed line will be designed to accommodate double-circuit 138 kV capability under PPL Electric's current 138 kV line specifications. There will be six 556 kcmil<sup>2</sup> 24/7 ACSR<sup>3</sup> "Parakeet"<sup>4</sup> conductors and two 48 single mode fiber ("SMF") optical ground wires ("OPGW") that will be supported in a vertical configuration. Based on preliminary engineering, the new line will require the installation of approximately 226 steel mono-pole structures with an average height of 115 feet. The average spans between the structures will be approximately 600 feet. The new structures will be made from self-weathering tubular steel equipped with steel arms.

32. The existing line segment consists of 428 structures, which are depicted in Figure 5-1 to Attachment 5, the Engineering Description, to this Application with an average span

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<sup>2</sup> "Kcmil" stands for thousand circular mils. 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 a thousandth (0.001) of an inch.

<sup>3</sup> "ACSR" stands for aluminum conductor steel reinforced.

<sup>4</sup> Parakeet is the technical term for a 556 kcmil 24/7 ACSR conductor.

length of 290 feet. The rebuilt transmission line will have almost 57 percent fewer structures than the existing transmission line.

33. The total estimated cost for the proposed work is approximately \$33.3 million for the transmission line work.

#### **IV. SITING ANALYSIS**

##### **A. SUMMARY**

34. PPL Electric seeks approval from the Commission to rebuild the 138/69 kV transmission line connections between four existing 69-12 kV substations (Lake Harmony, Jack Frost, Wagners, and Lake Naomi), two existing Tap Pole locations (Arrowhead Lake Tap Pole and Lake Naomi Tap Pole), and a new substation (Long Pond 69-12 kV Substation), which are located along the existing 138/69 kV alignment between the Lake Harmony 69-12 kV Substation and the Lake Naomi Tap Pole. The existing transmission line between the Lake Harmony 69-12 kV Substation and the Lake Naomi Tap Pole currently extends for a total of 24.47 miles across six segments which are identified in Paragraph No. 18 of this Application, above.

35. The data used in the siting study fall into three broad categories: (1) built environment (land use/cultural); (2) natural environment (ecological); and (3) engineering consideration (engineering design and constructability). Data were obtained from a variety of sources including federal, state and local Geographic Information System (GIS) databases; field reconnaissance surveys; public agencies; published documents; and other publicly available sources.

36. The Siting Team was composed of technical experts engaged with transmission line siting, design, and construction, as well as experts in the fields of environmental assessment, permitting, and public outreach. The Siting Team undertook an extensive siting study to identify

and evaluate potential alternative routes for the Lake Harmony - Lake Naomi 138/69 kV Transmission Line.

37. The siting methodology used for determining the Selected Route for the Lake Harmony - Lake Naomi 138/69 Transmission Line was adapted from the Electric Power Research Institute-Georgia Transmission Corporation (“EPRI-GTC”) protocol. The siting method consisted of four fundamental phases:

a. Generate Macro Corridors: Macro Corridors were developed to define the outer edges of the Project Study Area within the larger regional context. The first step identified major opportunities and constraints within the region to establish a Project Study Area. This included extensive background research regarding the overall environmental setting of the Project Study Area, the results of which are described in Attachment 3, Environmental Setting, to this Application.

b. Generate Alternative Corridors: Alternative Corridors most suitable for transmission line development within the Project Study Area were generated from four perspectives: (i) protection of the built environment, (ii) protection of the natural environment, (iii) engineering considerations, and (iv) a composite of these three.

c. Generate Alternative Routes: Alternative Routes most suitable for transmission line alignment were generated within the Alternative Corridors. These alternative routes provide the necessary substation connections, minimizing potential social, cultural, and natural environment impacts, while still being technically feasible to construct.

d. Determine Selected Route: A Selected Route was determined based on the quantitative and qualitative assessments of the Alternative Routes by the Siting Team.

39. The quantitative evaluation scored and ranked the Alternative Routes according to certain selected criteria, which are described in Section 2.0 of Attachment 4 to this Application, the Siting Analysis. The qualitative evaluation incorporated the professional judgment of the Siting Team to identify the Selected Route. The qualitative evaluation is an essential step in the selection process because not all criteria can be counted and scored. For example, permitting requirements will be different for alternative routes that cross Exceptional Value (“EV”) streams or major highways compared to potential routes that avoid these specific features. Similarly, community concerns will vary among the different alternatives based on their proximity to residential neighborhoods, socially sensitive areas, or public open spaces. Qualitative evaluations such as these provide essential insight into the determination of the Selected Route.

38. The ultimate goal of the Lake Harmony to Lake Naomi 138/69 kV Rebuild Project siting study was to identify an overhead electric transmission line alignment that minimizes the impact to the built and natural environments to the maximum extent practicable, while meeting the functional requirements and maintaining the technical and economic viability of the Project.

**B. STEP 1 – GENERATE MACRO CORRIDORS.**

39. Macro Corridor analysis began after the general start and end points of the new transmission line were established, *i.e.*, the substation location and tap pole. The first step in the Macro Corridor development was the creation of a land use/land cover GIS database to identify some of the key opportunity and constraint areas traditionally reviewed as part of a siting study. Opportunity areas include paralleling or rebuilding existing utility corridors, paralleling primary or secondary roads, or crossing open and undeveloped land.

40. The next step identifies Avoidance Areas, which, as a general rule, are excluded from the analysis as not being viable areas to site a transmission line. These Avoidance Areas

represent features that have typically been identified as requiring maximum protection from a development perspective or represent a significant physical barrier that would be impractical to cross. Examples of these areas include high/medium density residential areas, federal- or state-listed historic structures or districts, wildlife refuges, mines and quarries, national or state parks, church or cemetery parcels, airports, and military facilities. While it is typical to try to avoid these features, project specific circumstances may require that locations including these features be included in the analysis. For example if an existing transmission or utility corridor already crosses one of these avoidance features, it may be considered a potential option.

41. A GIS map of the regional area is then created using commercially available land use, land cover data and other feature data including road networks, terrain, and existing transmission line alignments. A Composite Suitability Surface Map, a map composed of these suitable land types, is then developed. The map is comprised of a grid of cells with an assigned value indicating cell areas which are suitable for a transmission line (an opportunity) or less suitable (a constraint). In the next phases of the process, the same method is employed using a smaller cell size to increase data precision.

42. The quantitative analysis used a series of grid cells across the regional area. Values determined by EPRI-GTC through stakeholder input are assigned to each cell according to its primary use. A value was assigned representing, for example, an opportunity area such as open land or a constraint area such as a residential neighborhood. A “least impact” corridor was identified by the mathematical addition of the values assigned to each cell between the start and end points. Opportunity areas were assigned low numbers, and constraint areas were assigned a high number. Therefore, the corridor with the lowest value or “least impact” is the corridor or path with the least potentially adverse impacts.

43. The features of each cell (*e.g.*, commercial land use, transmission line rights-of-way, agriculture, wetlands, and steep slopes) were ranked from one, being the most suitable for transmission line development, to nine, which is the least suitable. A feature was considered suitable if a transmission corridor through it is possible with minimal adverse impact. An open pasture is an example of a feature that would be considered suitable. A feature was considered less suitable if a transmission line going through it could have adverse consequences. A wetland area is an example of a feature that would be considered less suitable.

44. Based on the numeric values assigned to each feature, a composite suitability surface was created. This composite suitability surface was used to produce a series of potential broad corridor areas for the following three scenarios:

- a. Opportunities for rebuilding or paralleling existing transmission lines and other linear features.
- b. Opportunities to parallel existing road rights-of-way.
- c. Opportunities to cross undeveloped land.

45. The first two corridor scenarios represent corridor sharing opportunities, by paralleling existing linear features such as existing transmission lines, natural gas pipelines, or town and local roads. Corridor sharing is usually encouraged since it minimizes impacts by reducing the amount of new ROW required, concentrating linear land uses and reducing the number of new corridors and creating an incremental, rather than a new impact.

46. The third scenario looks at opportunities to cross undeveloped areas. These undeveloped areas are often further away from residential and other human development areas and may include for example, forested areas or agricultural fields. Crossing these areas, while

implementing best practices such as careful pole placements, typically allows for a reduced impact in areas where corridor sharing opportunities are absent or limited.

47. The Macro-Corridor process determined the corridor across the suitability surface that minimizes the sum of the values within that corridor. Corridors with the lowest sums have the highest overall suitability. Corridors with a larger suitability sums were considered less optimal.

48. The lowest sum areas, *i.e.*, the preferred transmission line development areas, were identified as scenario-specific Macro Corridors. After the most suitable scenario-specific Macro Corridor was identified for each of the three scenarios identified above, the three corridors were merged together into a final combined Macro Corridor area. The outer boundaries of the Macro Corridor areas defined the Project Study Area. This Project Study Area identifies a refined and focused area in which to acquire more detailed data for analysis. Such data are acquired by using a GIS based siting method. This focused Project Study Area represents the most practicable area in which to site the new transmission line.

### **C. STEP 2 - ALTERNATIVE CORRIDOR GENERATION**

49. Alternative Corridors were generated through GIS analysis from within the Project Study Area based on the following four distinct perspectives:

- i. Built Environment Perspective – protecting human and cultural resource areas by reducing potential Project conflicts with existing residential neighborhoods and other community-valued features.
- ii. Natural Environment Perspective – protecting plants, animals, aquatic, and other natural resources by minimizing the Project impact to ecological resources and natural habitat.
- iii. Engineering Considerations Perspective – maximizing co-location and minimizing cost and schedule challenges for the Project by seeking the shortest path or using existing ROW, while avoiding areas that pose significant construction obstacles, such as steep slopes or those used for unique agricultural practices.

- iv. Simple Composite Perspective – this perspective uses the same data as the other three, but offers equal consideration and weighting to the three perspectives noted above.

50. An assessment based on each of these four perspectives was conducted using GIS-based data, which are collections of similar information developed for organization and analysis. Similar, but more refined data, included with the Macro Corridors were used to establish each of the perspective-specific Alternative Corridors. Higher consideration was given to data aligned within each unique perspective. For example, the built environment assessment applied a higher weight to features related to building proximity and building density, whereas the natural environment evaluation applied a higher weight to floodplain and wildlife habitat features. Similarly, the engineering considerations assessment was based on linear infrastructure and slope features. The simple composite Alternative Corridor allows for direct comparison when equal weight is applied to the three primary considerations. The use of four perspectives allowed a comparison of the social, environmental, and engineering costs and benefits of the different Alternative Corridors.

**D. STEP 3 - GENERATE ALTERNATIVE ROUTES.**

51. The next step in the process, determining the Alternative Routes within the Alternative Corridors, was accomplished by using GIS analyses to identify preferred paths or alignments within each of the Alternative Corridors. A summary of the process used to generate the Alternative Routes is presented in Section 2.3 of Attachment 4 to this Application, which provides project-specific detailed information on this process.

52. Generation of the Alternative Routes for the transmission line used data similar to that used in developing the Alternative Corridors; however, this effort was focused on identifying a single alignment rather than a broader corridor area. Additionally, focus is given to potential pole placement locations to minimize impacts to the surrounding environment.

#### **E. STEP 4 - SELECT ROUTE**

53. To assess the advantages and disadvantages of the GIS-generated Alternative Routes, feature metrics -- or specific parameters measured for a particular feature (such as the number of residences within a given distance or number of stream crossings per route) -- were considered for each Alternative Route. These quantitative feature metrics were normalized, assigned relative weights, and organized within the three perspectives. The metrics were normalized to provide a means to compare the data. Using a normalized 0-100 scale allowed the different data values to be mathematically combined and compared without being distorted by differences in measurement scale. Establishing these quantitative values allowed for overall scoring of each Alternative Route. Lower scores are preferred as they indicate potentially less impact along that route. The numerical score provides an objective reference for comparing each of the Alternative Routes.

54. The final aspect of the evaluation process was to apply expert judgment to rank the Alternative Routes. During this process, Siting Team members qualitatively assessed the Alternative Routes. The routes were then ranked based on several important considerations, such as visual concerns, community concerns, schedule delay risk, special permit issues, and construction, maintenance, and accessibility issues. This process encouraged thorough discussion by Siting Team members as they evaluated and selected the final Selected Route in an objective, consistent and comprehensive manner.

55. PPL Electric repeated the process described above for each of the six segments of the proposed rebuild of the Lake Harmony – Lake Naomi Transmission Line. This process is described in detail in Attachment 4 to the Application. For five of the six segments, PPL Electric

determined that using the existing right-of-way would have the least social and environmental impact on the surrounding areas.

56. Based on its siting analyses, PPL Electric proposes to reroute approximately one mile of the segment between the Wagners 69-12 kV Substation and the Lake Naomi 69-12 kV Substation. PPL Electric determined that relocating approximately one mile of this segment would reduce potential environmental impacts and improve future access and maintenance of the Line.

57. The two best alternative routes for this segment were the existing route, Route L, and the one that reroutes approximately one mile of the line, Route M. Route M had the lowest, *i.e.*, most favorable for a transmission line, score in the quantitative assessment as explained in detail in Section 2.4.4.6 and illustrated in Table 4-14 of Attachment 4 to this Application. This alternative had the lowest weighted score for one of the three perspectives of the siting process (natural environment), and was second lowest in the other two perspectives (built environment and engineering considerations). Based on the results of the quantitative assessment, the Siting Team concluded that Alternative Route M would result in fewer impacts than the other options.

58. The results of the qualitative assessment conducted by PPL Electric of the Alternative Routes for this segment, which is explained in detail in Section 2.4.4.7 and illustrated in Table 4-15 to Attachment 4 to this Application, indicate that Alternative Route M has the lowest weighted scores for visual concerns, construction issues, and schedule delay risk. This route scored similar to Alternative Route L with regard to community issues, primarily due to the extensive co-location of these two alternatives.

59. Therefore, based on the quantitative assessment of the Alternative Routes, in conjunction with a qualitative siting process, the Siting Team selected Alternative Route M for

the Wagners Substation-Lake Naomi Substation Segment of the Lake Harmony to Lake Naomi 138/69 Rebuild Project, as illustrated on Figure 4-5 to Attachment 4 to this Application. Because Alternative Route M was determined to be the most suitable route based on both the quantitative and qualitative analyses, it was selected for this segment of the Lake Harmony – Lake Naomi Transmission Line.

## **V. LAND USE, ENVIRONMENTAL, AND CULTURAL RESOURCES**

60. During the siting process, PPL Electric made efforts to minimize impacts on existing and future land uses, as well as avoid sensitive natural resources such as wetlands and streams. Attachment 3 to this Application provides a detailed evaluation of the potential impacts to land use, natural environment, and cultural resources.

61. The Project Study Area includes portions of Kidder Township in Carbon County and portions of Coolbaugh, Pocono, Tobyhanna and Tunkhannock townships as well as portions of Mount Pocono Borough.

### **A. HYDROLOGY**

62. The Pennsylvania Department of Environmental Protection (“PADEP”) has adopted regulations at 25 Pa. Code Ch. 93, which establish narrative and numeric water quality criteria necessary to support a variety of protected water uses. All surface waters must be protected for aquatic life (cold and warm water fish), water supply (potable, industrial, livestock, wildlife, and irrigation), and recreation (boating, fishing, water contact sports, and aesthetics). PADEP assigns all streams in the Commonwealth a Designated Use, which is the water use goal for a particular stream segment, regardless of whether it is currently being attained. In contrast, a stream’s Existing Use is the use actually attained by existing water quality. The Project Study Area spans two watersheds of the Central Region of the Delaware River Basin. The majority is in the Lehigh Valley watershed and a small area is in the eastern portion within the Upper

Central watershed. The western portion of the Project Study Area, within the Lehigh Valley watershed is occupied by the Lehigh River watershed and the Tobyhanna Creek watershed. The eastern portion of the Project Study, which is in the Upper Central watershed of the Delaware River, includes areas of the Paradise Creek and Pocono Creek watersheds.

63. PADEP's antidegradation policy requires existing uses, and the level of water quality necessary to protect existing uses, be maintained and protected.

64. The areas adjacent to streams subject to inundation by a flood elevation with a 1-percent-annual-chance of being equaled or exceeded each year are known as the 100-year floodplains. The Federal Emergency Management Agency ("FEMA") delineates the extent of some 100-year floodplains on Flood Insurance Rate Maps. 100-year floodplain extents in the Project Study Area and surrounding landscape were obtained and examined. The floodplain data were adapted by PADEP from the FEMA 100-year floodplain maps and made available through the Pennsylvania Spatial Data Access database. Figure 3-6 to Attachment 3 to this Application shows the 100-year floodplain boundaries for the Project Study Area.

65. Numerous open water bodies are located within the Project Study Area. Major lakes include Lake Harmony, Lake Naomi, Pocono Lake, Tamaque Lake, and Stillwater Lake. A complete list of named lakes within the Project Study Area, obtained from the USGS National Hydrography Dataset database, is provided in Table 3-4 to Attachment 3 to this Application.

66. U.S. Fish and Wildlife Service ("USFWS") National Wetland Inventory ("NWI") wetland maps indicate that wetlands throughout the Project Study Area are primarily palustrine (*i.e.*, non-tidal, freshwater) wetlands dominated by trees, shrubs, persistent emergent vegetation, and emergent mosses and lichens. Numerous areas of NWI wetlands, primarily palustrine forested or shrub/scrub communities, are present throughout the Project Study Area especially

along stream valleys between rounded hills. Palustrine emergent wetlands also are scattered throughout the landscape.

## **B. PLANT AND WILDLIFE HABITATS**

67. The Project Study Area contains unique areas of natural environment composed of native plant and wildlife habitats. Many of these natural areas are preserved for their ecological benefit along with their value as a recreational resource.

68. Vegetation within the Project Study Area includes both natural undeveloped areas dominated by upland or wetland forests and human influenced plant communities such as landscaped areas, successional meadows, and several agricultural fields.

69. Typical wildlife species found within the Project Study Area include a variety of mammals, birds, amphibians, and reptiles. Common mammals include the white-tailed deer (*Odocoileus virginianus*), eastern cottontail (*Sylvilagus floridanus*), gray squirrel (*Sciurus carolinensis*), and chipmunk (*Tamias striatus*); other less common mammals include the black bear (*Ursus americanus*), river otter (*Lutra canadensis*), and beaver (*Castor canadensis*). Bird species range from the robins (*Turdus migratorius*), blue jays (*Cyanocitta cristata*), red-wing blackbirds (*Agelaius phoeniceus*), and house wrens (*Troglodytes aedon*) that are noted in more developed areas to the common yellowthroat (*Geothlypis trichas*), wood ducks (*Aix sponsa*), bobwhite quail (*Colinus virginianus*), and whip-poor-wills (*Caprimulgus vociferous*) that are typically found in specific habitat areas. Common amphibians and reptiles include the northern green frog (*Rana clamitans melanota*), bullfrog (*Rana catesbeiana*), red-spotted newt (*Notophthalmus viridescens*), wood turtle (*Clemmys insculpta*), black rat snake (*Elapha obsoleta*), and northern water snake (*Nerodia sipedon*) (Fergus and Hansen 2000).

70. Based on a search of the Pennsylvania Natural Diversity Inventory ("PNDI") database and follow-up consultations with the United States Fish and Wildlife Service

(“USFWS”), Pennsylvania Fish and Boat Commission (“PFBC”), Pennsylvania Gas Commission (“PGC”) and Pennsylvania Department of Conservation and Natural Resources (“PADCNR”), rare, threatened or endangered species of plants and animals could potentially occur within the Project Study Area.

71. Habitat assessments for rare, threatened or endangered species may be required by the jurisdictional agencies as part of the environmental permitting and approval process for the Project. PPL Electric will comply with any requirements for further conservation measures in the permitting process. PPL Electric believes that its proposal to rebuild the Lake Harmony – Lake Naomi Transmission Line primarily in the existing right-of-way will minimize impacts on rare, threatened or endangered species of plants and animals.

### **C. SPECIAL USE AREAS**

72. Special use areas are places recognized by regulatory agencies or local governments as providing habitat characteristics or wildlife management opportunities that indicate a need for preservation. Examples include scenic areas, wilderness areas, wild and scenic rivers, state and conserved lands, priority natural areas, and important bird areas (“IBA”).

73. The PADCNR designates scenic areas including vistas and overlooks, waterfalls, scenic hikes, and other special use areas. There are no designated scenic areas within the Project Study Area.

74. There are, however, two Heritage Geology Sites designated by the Pennsylvania Natural Heritage Program (“PNHP”) within the Project Study Area. The first site is the Hickory Run Boulder Field, in Hickory Run State Park, which is both a National Natural Landmark through the National Park Service (“NPS”) and a Heritage Geology Site through PADCNR. The second is Split Rock, which is a unique rock outcrop in the southwestern portion of the Project Study Area. There is also a trail within the Project Study Area which is part of the Hickory Run

State Park Trails network. All of these features are displayed on Figure 3-8 to Attachment 3 to this Application.

75. No portion of the National Wilderness Preservation System or wild or scenic rivers, as designated pursuant to the federal Wild and Scenic Rivers Act or by the Pennsylvania Scenic Rivers Act are located in the Project Study Area.

76. Several State Game Lands (“SGL”), including 26,000-acre SGL #127, 3,500-acre SGL #129, and 870-acre SGL #318, are each located at least partially within the Project Study Area. The southwest corner of the Project Study Area falls within the boundary of the 15,990-acre Hickory Run State Park. Aside from these state owned lands, there are lands conserved by private groups, including The Nature Conservancy, Pine Crest Lake Community Trust, and Bethlehem Area Boy Scouts of America.

77. The Natural Areas Inventories (“NAI”) for Monroe and Carbon Counties, conducted by The Nature Conservancy (“TNC”), indicate that twenty four Priority Natural Areas are partially or wholly located within the Project Study Area. These sites are associated with locations of “rare, threatened, and endangered plant and animal species and the highest quality natural areas” (TNC 2005).

78. IBAs are “designated by the Audubon Society’s Pennsylvania Ornithological Technical Committee (“POTC”), as the most critical regions in the Commonwealth for conserving bird diversity and abundance. The POTC identified three Important Bird Areas that intersect the Project Study Area.

#### **D. HUMAN ENVIRONMENT OF THE PROJECT STUDY AREA**

79. Human influences on the natural environment within the Lake Harmony – Lake Naomi Project Study Area are represented by many development types and patterns.

Relatively few sections of the Project Study Area are used for agricultural purposes, and these sections are located primarily in the central western portion of the study area. The primary agricultural use involves row crops such as hay, corn, and soybeans. Other agricultural uses include horse pastures and dairy farms; these uses are limited in this area compared to row crops. There are no agricultural lands within the Project Study Area in Carbon County.

80. There are no active railroads or airports within the Project Study Area. The closest airport is Pocono Mountains Municipal Airport, which is located approximately 1.5 miles northeast of the Project Study Area. PPL Electric will consult with the Federal Aviation Administration and the PennDOT Bureau of Aviation to ensure that the Lake Harmony – Lake Naomi Transmission Line will not interfere with aviation operations.

81. The communication/transportation/utilities facilities in the Project Study Area are PPL Electric transmission line substations, a FedEx freight location, Commonwealth Telephone Company buildings, Transcontinental Gas Pipe Line Corporation buildings, and a cell tower.

82. No federal or county parks are located in the Project Study Area. The 15,990-acre Hickory Run State Park is located in the southwestern corner of the Project Study Area. The 26,000-acre State Game Land #127, 3,500-acre State Game Land #129, and 870-acre State Game Land #318 are all located within the Project Study Area. There are other significant areas of public open spaces within the Project Study Area including those owned and maintained by Deer Run Corporation, Pocono Heritage Land Trust, Pocono Manor Investors, The Nature Conservancy, and Wildlands Conservancy. There are also four golf courses present within the

Project Study Area boundary. These lands account for 24 percent of the total Project Study Area.

83. Three public schools, Pocono Mountain West High School, Pocono Mountain West Junior High School, and Tobyhanna Elementary School, are located in the central eastern portion of the Project Study Area. There is also a private day care center along State Route (SR) 940 near Lake Naomi.

84. Forests are a land use/cover type that range from large uninterrupted areas of undeveloped wooded land typically associated with private conservation and real estate entities, to smaller forested areas associated with local residential development that often indicates the presence of steep slopes, rocky soils, or wet areas that could not be developed. Cumulatively, these forested areas account for 35 percent of the Project Study Area.

85. The largest parcels of forest cover in the Project Study Area are associated with The Nature Conservancy, Pocono Lake Preserve, Pocono Manor Investors, and Blue Ridge Real Estate Company.

86. Facilities used to provide government services are spread throughout the Project Study Area. Such facilities are owned by the Bethlehem Authority, Tobyhanna Township Board of Supervisors, The Monroe County Municipal Waste Management Authority, the Tobyhanna Township Volunteer Fire Company, the Commonwealth of Pennsylvania, Evangelical Press Building, or the Pocono Mountain Police Commission.

87. Few industrial facilities are located in the Project Study Area. Such facilities occupy less than 1 percent of the total area.

88. Residential land use, which is composed primarily of single-family residences and vacation rental homes, accounts for 20 percent of the Project Study Area. Much of the

residential development has occurred within the past 30 years. The majority of the residential land use is contained within communities centered on the lakes in the region. These communities include Lake Naomi Estates, Emerald Lakes, Pocono Lake Preserve, Split Rock, and Pocono Pines. Also within the Project Study Area are the Blakeslee Estates, Wagners Forest Park, Fawn Ridge Estates, Camelot Forest, and Little Summit residential communities.

89. Commercial land use occurs primarily as retail development along SR 940 across the Project Study Area. The highest density of commercial development is in the community of Blakeslee at the intersection of SR 940 and SR 115. In other areas, most of the commercial sites are situated along SR 940 and include restaurants, hotels, automotive service stations, and a variety of specialty shops.

90. Resorts and group camps in the Project Study Area include the Inn at Pocono Manor, a four-season resort, Camp Minsi, a 1,200 acre Boy Scout Camp, and Camp Mosey Wood, a 425 acre Girl Scout Camp, located near the Lake Harmony Substation.

91. Service related land uses in the Project Study Area include banks, real estate offices, churches and cemeteries. Most of these features are concentrated along SR 940.

92. Vacant lands are scattered throughout the Project Study Area and are associated with a wide variety of land cover types and parcel sizes.

93. The linear infrastructure present in the Project Study Area includes roadways, abandoned railroads, and existing transmission corridors.

94. The primary roadway systems within the Project Study Area are I-80 (east to west) and I-380 (north to south). I-380 branches off I-80 just south of the Project Study Area. Remaining road networks are comprised of numerous multiple-lane state routes (SR 115, SR 314, SR 423, and SR 940), numerous local roads, residential streets, and unpaved forest roads.

95. No railroads are presently active in the Project Study Area. An abandoned railroad corridor bisects the Project Study Area from southeast to northwest. Portions of the railroad alignment are used by the existing Lake Naomi 138/69 kV Tap and Lake Naomi-Wagners 138/69 kV Transmission Line in Little Summit and near Pocono Lake.

96. Power transmission corridors located within the Project Study Area consist of 138/69 kV lines owned by PPL Electric. Transmission corridors include the Lake Naomi 138/69 kV Tap, the Lake Naomi-Wagners 138/69 kV Tie, and the East Palmerton – Wagners 138/69 kV line.

97. Two gas pipelines are located in the Project Study Area. The first, owned by Transcontinental Gas Pipe Line Corporation, enters the Project Study Area in the northwest corner and heads southeast across and from the Project Study Area. The other pipeline is owned by UGI Utilities and enters the Project Study Area on its western edge near Jack Frost Substation and heads generally northeast across the Project Study Area before leaving near Warnertown.

98. A review of the cultural resources within the Project Study Area is required by various state agencies to ensure their preservation. A desktop survey of existing historic structures and archaeological resources within the Project Study Area was conducted by accessing the Pennsylvania Historical and Museum Commission's ("PHMC") Bureau of Historic Preservation's Cultural Resources Geographic Information System ("CRGIS") to review available information on historic structures, archaeological surveys, and previously recorded archaeological sites.

99. Four National Register of Historic Places ("NRHP") listed or eligible historic properties were identified in the Project Study Area.

100. Two historic districts are located in the Project Study Area: Pocono Manor Historic District, which is NRHP listed (PHMC Key No. 104015) and Stoddartsville Historic District, which is NRHP eligible (PHMC Key No. 082615). The Pocono Manor Historic District reflects the early-20th century resort industry in the Pocono Mountains and Stoddartsville Historic District was settled in the early-to-mid 19th century as a milling center that later grew into a small resort.

101. In addition, there are two historic buildings in the Project Study Area: Beaver Brook Girls Camp, which is NRHP eligible and Blue Ridge Real Estate Building, which is NRHP eligible. The Camp was found significant as an example of a c. 1900 camp and the Building was found significant for its Colonial Revival-style architecture.

102. Twenty five archaeological sites have been identified within the Project Study Area, most of which cluster along Tobyhanna Creek, both at the western end of the Project Study Area and within the Pocono Lake area. Site types include a historic-period domestic site, a farmstead, several historic sites of unknown function, prehistoric open habitation sites, a lithic reduction site, and two prehistoric sites of unknown function. Most of the prehistoric sites are located on floodplains, though there are sites on a stream bench, terraces, upland flats, and upper slopes. Almost 90 percent of the sites for which data are available are located within 200 feet of water.

103. None of the archaeological sites are listed on the NRHP. Most of the sites have not been evaluated for NRHP significance, with the exception of the historic-period farmstead, which has been determined not eligible.

104. In the siting analysis, Attachment 4 to this Application, PPL Electric explains in detail the steps it plans to take to avoid significant features that are near the proposed route for

the rebuild of the Lake Harmony – Lake Naomi Transmission Line or to mitigate impacts where the features are not reasonably avoidable.

105. Local zoning ordinances have been adopted in five of the six (none for Mount Pocono Borough) municipalities located within the Project Study Area. Generally, these ordinances guide future land use by encouraging development of desirable residential, commercial, agricultural, and industrial areas with appropriate groupings of compatible and related land uses. The various zoning districts outlined in these ordinances reflect the diverse land use character of the region. Ordinances defining the allowances and restrictions associated with the various zoning districts typically identify “Essential Services,” which include distribution, transmission, or collection systems associated with utilities such as water, gas, and electric, to be conditionally exempt from local regulations, as long as the required actions are approved by the Commission.

106. Upon review of the County Parcel Data, areas have been identified where land has been subdivided for future residential development. One such location is in Blakeslee Estates located on the north-side of Route 940. In addition to these proposed development areas, there are many vacant parcels in existing residential developments that have the potential for future home construction.

## **VI. RIGHTS-OF-WAY**

107. Right-of-Way width is determined by structure type, design tensions, span length, and conductor “blowout” (the distance the wires are moved by a crosswind). In general, the route for the new line will be within existing PPL Electric right-of-way. The existing right-of-way varies in width generally between a minimum of 70 feet and a maximum of 100 feet, although there is a short section which is 200 feet wide.

108. The route does contain an approximately one mile long re-route, outside the existing PPL Electric right-of-way, near the Wagners Substation. The re-route section requires PPL Electric to acquire a new 100 foot wide right-of-way from two separate property owners. To date, PPL Electric has acquired one of the two required easements and has an agreement in principle with the PGC for the other required easement. PPL Electric does not need to acquire any other land rights in order to construct the Project.

## **VII. HEALTH AND SAFETY**

109. The proposed rebuild of the Lake Harmony – Lake Naomi Transmission Line will not create any unreasonable risk to the public health or safety. The above-described transmission work for the Lake Harmony – Lake Naomi Transmission Line will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electric Safety Code (“NESC”) minimum standards and all applicable legal requirements. Descriptions of the NESC standards, PPL Electric’s design criteria, and PPL Electric’s safety practices are provided in Attachment 10 to this Application.

110. 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. PPL Electric’s Magnetic Field Management Program has been developed to implement that policy decision.

111. Magnetic fields decrease as the distances from the source increase. Therefore, consistent with the program, PPL Electric will construct for minimum five feet higher than the required ground clearance for the proposed 138/69 kV line. PPL Electric will select the optimal

circuit/phase arrangement to achieve the lowest magnetic field practical. The phasing arrangement, however, may need to match to the existing lines at the connection/tap points.

### **VIII. NOTICE AND SERVICE**

112. PPL Electric announced its intent to construct the Project in January, 2013. Since then, PPL Electric has undertaken activities to provide information on the Project to the public and government officials and to collect input. These activities have included the following:

a. Calls and e-mails to Government Officials – PPL Electric representatives made phone calls and sent e-mails to local government officials to brief them on the project and invite them to the planned open house.

b. Letters – PPL Electric sent notification letters to all property owners within a 1,000-foot corridor of the transmission line.

c. Fact Sheet – A fact sheet was developed to provide an overview of the project. This document included information on the planned open house. The fact sheet was distributed to property owners in the 1,000-foot corridor, as well as at the open house.

d. News Advertisements – PPL Electric announced the open house in an advertisement that ran in the local newspaper, the Pocono Record, on January 2, 2013.

e. Open House – PPL Electric held a public open house on Thursday, January 17, 2013 at the American Legion Wilson Fischer Post in Monroe County. The intent of the open house was to provide information and seek community input on the project. The open house provided detailed information about the project and gave attendees the opportunity to ask questions and provide input and information to representatives of PPL Electric.

f. An exhibition-style format was employed at the public workshop using a variety of displays to explain various aspects of the Project. Displays were staffed by representatives of PPL Electric and other experts who explained the Project to attendees, received feedback and other input from attendees, and answered questions and/or recorded questions for subsequent follow-up. The displays and the literature covered various subjects, such as the electrical need for the line, engineering and construction requirements, right-of-way acquisition procedures, and route-selection procedures.

113. Prior to and after the open houses, PPL Electric received and responded to additional comments from interested residents. PPL Electric will continue responding to comments and inquiries and provide periodic written updates to residents and other interested persons. PPL Electric will continue its commitment of open communications and, where practical, will be responsive to input regarding the project from local residents and other interested parties.

114. PPL Electric has provided public notices in accordance with Section 69.3102 of the Commission's Interim Siting Guidelines, 52 Pa. Code § 69.3102. The public notices for this project are provided in Attachment 13 to this Application.

115. Copies of this Application and notices of filing are being served in accordance with the provisions of Section 57.74 of the Commission's regulations, 52 Pa. Code § 57.74.

116. As soon as practicable after the filing of this Application, PPL Electric will publish notice of the filing in two newspapers of general circulation in the area of the Lake Harmony – Lake Naomi Project. This notice will: (a) note the filing with the Commission; (b) provide brief description of the Project and its location; (c) provide locations where the complete

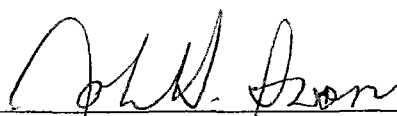
application may be reviewed by the public; and (d) provide any additional information as directed by the Commission.

117. PPL Electric also requests that the Commission publish notice of this Application in the Pennsylvania Bulletin.

**IX. CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve this Application for approval of the siting and rebuild of the double circuit Lake Harmony – Lake Naomi 138/69 kV Transmission Line in Coolbaugh, Pocono, and Tobyhanna townships in Monroe County and in Kidder Township, Carbon County as explained above and in the Attachments to this Application.

Respectfully submitted,



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Date: June 7, 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: 5/31/13

Stephanie Raymond  
Stephanie Raymond