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File #: 2507/151809

October 28, 2013

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Letter of Notification of PPL Electric Utilities Corporation, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, With Respect to the Reconstruction of the St. Johns - Freeland 69 kV Transmission Tie Line in Butler and Foster Townships, Luzerne county, Pennsylvania
Docket No. A-2013-2352732**

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Conference Memorandum of PPL Electric Utilities Corporation for the above-referenced proceeding. Copies will be provided as indicated.

Respectfully submitted,

Christopher T. Wright

CTW/skr
Attachment

cc: Honorable Ember Jandebour
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Prehearing Conference Memorandum of PPL Electric Utilities Corporation** has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA REGULAR MAIL

Pennsylvania Historical and Museum Commission
Bureau of Historic Preservation
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120-0053
Attn: Mr. Douglas C. McLearn, Chief

Honorable Barry Schoch, P.E., Secretary
Pennsylvania Department of Transportation
C/O Office of Chief Counsel
Commonwealth Keystone Building
400 North Street, 9th Floor
Harrisburg, PA 17120
Attn: William J. Cressler

Department of Environmental Protection
PO Box 2063
Market Street State Office Building
Harrisburg, PA 17105-2063
Attn: Office of Field Operations

Bureau of Investigation & Enforcement
PO Box 3265
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265

Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101

Luzerne County Council
200 North River Street
Wilkes-Barre, PA 18711
Attn: Tim McGinley, Chair

Luzerne County Planning Commission
Penn Place
20 North Pennsylvania Avenue
Wilkes-Barre, PA 18711
Attn: Adrian Merolli, Chair

Butler Township Board of Supervisors
415 West Butler Drive
Drums, PA 18222
Attn: Brian Kisenwether, Chair

Butler Township Planning Commission
415 West Butler Drive
Drums, PA 18222
Attn: Paul Feno, Chair

Foster Township Board of Supervisors
1000 Wyoming Avenue
PO Box 465
Freeland, PA 18224
Attn: John Brogan, Chair

Foster Township Planning Commission
1000 Wyoming Avenue
PO Box 465
Freeland, PA 18224
Attn: Greta Zoshak, Chair

David J. Gronski, Et al
534 E 6th Street
Hazleton, PA 18201

Dennis and Bonnie Miller
P. O. Box 1
Saint Johns, PA 18247

Donald B. and Diane E. Stefanick
881 St. Johns Road
Drums, PA 18222

Joseph and Dorothy Callavini
Barry Callavini
PO Box 256
Lattimer Mines, PA 18234

Robert L and Anne L Stackhouse
C/O Anne L Brewer
36093 Silcott Meadow Place
Purcellville, VA 20132

Robert and Anne Stackhouse
825 Old Fritztown Rd
Sinking Spg, PA 19608-9151

Scott Horlacher
140 West Thirwell Avenue
Hazleton, PA 18201

Susan R and Jeffrey W Sauers
PO Box 77 Kings Rd
Saint Johns, PA 18247-0077

Anthony M and Bernadette Debias
713 Station Square Blvd
Lansdale, PA 19446

Gloria C Benderavich
John W Osmond Jr
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Drums, PA 18222-1914

Jack C and Mary P Lamont
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Hazleton, PA 18201-4859

Elizabeth L Lamont
Po Box 702
Conyngham, PA 18219-0702

Michael P and Sharon Sabia
186 N Old Turnpike Rd
Drums, PA 18222-1914

Edward & Deborah Telatovich
PO Box 112
168 N Old Turnpike Road
Saint Johns, PA 18247

Robert Jr and Helen James
175 N Old Turnpike Rd
Drums, PA 18222

David M Jr and Renee A Katona
141 S Glendale Ln
Drums, PA 18222-2237

Bruce and Beverly Hilliard
PO Box 655
Conyngham, PA 18219-0655

Ronald G and Deborah J Zimmerman
151 S Glendale Ln
Drums, PA 18222-2237

Christopher P James
158 S Glendale Ln
Drums, PA 18222

Kathleen M and David A Purcell
161 S Glendale Ln
Drums, PA 18222

Jason J James
225 N. Ridge Drive
Landisville, PA 17538

Joseph R and Ralph M Ferdinand
67 N Church St
Hazleton, PA 18201-5801

Mark A and Maureen T Zane
PO Box 423
Drums, PA 18222-0423

Edward S and Jessica B Polashenski
227 West Butler Drive
Drums, PA 18222

Craig L and Elizabeth Wallen
199 West Butler Drive
Drums, PA 18222

Michael A and Nancy Washinsky
131 W Butler Dr
Drums, PA 18222

Giovanna Fellin
Mira Val Apt # 4
55 W. Butler Drive
Drums, PA 18222-0116

Adam R Lee
49 W Butler Dr
Drums, PA 18222-2308

Celeste F Kosko Etal
40 N Vine St
Hazleton, PA 18201-5846

Kevin Lamont
79 Council Crest Lane
Hazleton, PA 18202

Victor F and Mary Jean Greco
50 Drasher Rd EZ Acres
Drums, PA 18222-2614

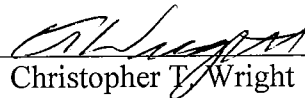
William Lubrecht III
C/O Dorothy White
521 7th ST
New Cumberland, PA 17070-1504

Jeffrey R Jenkins
David W Jenkins IV
57 Silo Hill Dr
Richboro, PA 18954-1146

George Alberts Jr
PO Box 397
Pittston, PA 18640

Joseph P. Semasek
331 Monroe St.
McAdoo, PA 18237

Date: October 28, 2013


Christopher T. Wright

**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-2013-2352732
Respect To The Reconstruction of the St. :
Johns – Freeland 69 kV Transmission Tie :
Line In Butler and Foster Townships, :
Luzerne County, Pennsylvania :

**PREHEARING CONFERENCE MEMORANDUM OF
PPL ELECTRIC UTILITIES CORPORATION**

**TO ADMINISTRATIVE LAW JUDGE
EMBER S. JANDEBEUR:**

PPL Electric Utilities Corporation (“PPL Electric”) hereby submits this Prehearing Conference Memorandum.

I. SERVICE OF DOCUMENTS

1. PPL Electric requests that all documents be served on:

Christopher T. Wright
Post & Schell, PC
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
cwright@postschell.com

PPL Electric agrees to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies be served upon Paul E. Russell at perussell@pplweb.com, David B. MacGregor at dmacgregor@postschell.com, and John H. Isom at jisom@postschell.com.

II. PROCEDURAL HISTORY

2. This proceeding was initiated on March 8, 2013, when PPL Electric filed the “Letter Of Notification Of PPL Electric Utilities Corporation, Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G, With Respect To The Reconstruction of the St. Johns – Freeland 69 kV Transmission Tie Line In Butler and Foster Townships, Luzerne County, Pennsylvania” (“LON”), which was docketed at Docket No. A-2013-2352732.

3. In the LON, PPL Electric is seeking approval from the Pennsylvania Public Utility Commission to reconstruct in place the existing St. John-Freeland 69 kV Transmission Tie Line (“St. Johns-Freeland Line”) in Butler and Foster Townships, Luzerne County, Pennsylvania. The St. Johns-Freeland Line is approximately 90 years old, is in a deteriorated condition, has structures with an outdated design and cannot be relied upon to continue to provide reliable service in the future. In addition, replacing the old conductors, as part of the reconstruction of the Line, with modern conductors with greater capacity will enable PPL Electric to restore service to more customers in a shorter period of time in the event of an outage of other facilities in the area and to resolve a violation of PPL Electric’s Reliability Principles and Practices.

4. On April 17, 2013, PPL Electric was served with a protest filed by Deborah Telatovich. On May 6, 2013, PPL Electric was served with a protest filed by Sharon Sabia. The protests raises issues related to PPL Electric’s vegetation management practices and alleged potential impacts from the proposed reconstruction of the existing St. Johns-Freeland Line.

5. On August 28, 2013, a Notice was issued scheduling an Initial Prehearing Conference before the Honorable Administrative Law Judge Ember S. Jandebour (the “ALJ”) on Tuesday, November 5, 2013, in Room 318, Scranton Office Building, 100 Lackawanna Ave., Scranton Pennsylvania 18503.

6. On August 28, 2013, the ALJ issued a Prehearing Conference Order directing the parties to, among other things, file a Prehearing Conference Memorandum pursuant to 52 Pa. Code § 5.222(d).

III. ISSUES

7. PPL Electric intends to demonstrate that the reconstruction of the existing St. Johns-Freeland Line in portions of in Butler and Foster Townships, Luzerne County, Pennsylvania is reasonably necessary to replace a 90 year old transmission line that is in a deteriorated condition, has structures with an outdated design and cannot be relied upon to continue to provide reliable service in the future.

8. PPL Electric also intends to demonstrate that replacing the old conductors, as part of the reconstruction of the St. Johns-Freeland Line, with modern conductors with greater capacity will enable PPL Electric to (i) restore service to more customers in a shorter period of time in the event of an outage of other transmission facilities in the area, (ii) resolve a violation of its Reliability Principles and Practices, and (iii) allow PPL Electric to serve increased load in the future.

9. PPL Electric intends to demonstrate that abandoning the St. Johns-Freeland Line is not feasible because it would cause a deterioration of service reliability in the area.

10. PPL Electric intends to demonstrate that the proposed reconstruction of the existing St. Johns-Freeland Line will not create any unreasonable risk of danger to the health and safety of the public.

11. PPL Electric intends to demonstrate that the existing St. Johns-Freeland Line will be reconstructed in compliance with applicable statutes and regulations providing for the protection of the natural resources of the Commonwealth. PPL Electric will demonstrate that it

will obtain any and all environmental permits necessary prior to construction and will comply with any conditions on those permits during construction.

12. PPL Electric intends to demonstrate that reconstructing the existing St. Johns-Freeland Line in place is reasonable and will have minimum adverse environmental impacts, considering the electric power needs of the public, the state of the available technology and the available alternatives.

13. PPL Electric also intends to demonstrate that its vegetation management practices are necessary to ensure the safety and reliability the electric system.

IV. WITNESSES

14. PPL Electric intends to present the following statements, in its case-in-chief, in support of the above-captioned Applications and Petitions:

<u>Witness</u>	<u>Topics</u>
Justin Wehr 2 North Ninth Street Allentown, PA 18101	Overview of the Project; describing the process employed by PPL Electric in developing, preparing and filing the LON; explaining the retention of DiGioia, Gray and Associates; explaining PPL Electric’s corporate policy on measures to mitigate the impact of a transmission line; describing why it is reasonable and appropriate to reconstruct the existing St. Johns-Freeland Line in place; and summarizing the benefits of this Project for PPL Electric and its customers.
Andrew Zorn DiGioia, Gray and Associates 570 Beatty Road, Monroeville, PA 15146	Explaining the condition of the existing St. Johns-Freeland Line and the need to reconstruct the Line.
Kenneth Hampton 2 North Ninth Street Allentown, PA 18101	Addressing the need to reconstruct the existing St. Johns-Freeland Line; explaining why the Line cannot be abandoned; explaining the need to replace the old conductors, as part of the reconstruction of the St. Johns-Freeland Line; and explaining the benefits of the Project.
George Neme 2 North Ninth Street Allentown, PA 18101	Explaining the design features and safety of the proposed reconstructed St. Johns-Freeland Line.

Colleen Kester 2 North Ninth Street Allentown, PA 18101	Explaining the existing right-of-way for the St. Johns-Freeland Line; and describing the right-of-way across the protestants' properties.
Stephen Dahl 165 Beach Lake Highway Honesdale, PA 18431	Explaining PPL Electric's vegetation management practices.

15. PPL Electric reserves the right to call additional witnesses to address any issues that may arise during the course of the proceeding.

V. DISCOVERY

16. To date, PPL Electric has not received any discovery requests. PPL Electric does not believe that any change or modification in the standard timelines for discovery set forth in the Commission's regulations is necessary or appropriate.

VI. LITIGATION SCHEDULE

17. PPL Electric is prepared to discuss the litigation schedule with the parties at the Prehearing Conference. To the extent that the parties are unable to agree on a schedule, PPL Electric proposes that the following schedule be adopted for resolution of this proceeding:

Prehearing Conference	November 5, 2013
PPL Electric Direct	January 13, 2014
Other Parties' Direct	February 10, 2014
Rebuttal	March 5, 2014
Surrebuttal	March 25, 2014
Evidentiary Hearings	April 8-9, 2014
Initial Briefs	May 9, 2014
Reply Briefs	June 2, 2014


VII. SETTLEMENT

18. PPL Electric remains open and available for settlement discussions with the other parties and all affected landowners.

19. PPL Electric does not perceive any need to include specific dates for settlement conferences in the procedural schedule.

Respectfully submitted,

Paul E. Russell (I.D. #21643)
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Two North Ninth Street
Allentown, PA 18101
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Dated: October 28, 2013

Attorneys for PPL Electric Utilities Corporation