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Christopher T. Wright

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File #: 151793

January 10, 2014

***VIA E-MAIL & REGULAR MAIL***

Honorable David A. Salapa  
Administrative Law Judge  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265

**Re: Application of PPL Electric Utilities Corporation filed pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the Double-Circuit 138/69 kV Honey Brook - Twin Valley Transmission Line in Portions of Caernarvon Township, Berks County, Honey Brook Township, Chester County and Caernarvon Township, Lancaster County, Pennsylvania  
Docket No. A-2013-2392102**

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Dear Administrative Law Judge Salapa:

Enclosed is the Prehearing Conference Memorandum of PPL Electric Utilities Corporation for the above-referenced proceeding.

Copies have been provided as indicated on the Certificate of Service.

Respectfully submitted,

Christopher T. Wright

CTW/jl  
Enclosures

cc: Rosemary Chiavetta, Secretary (*via Electronic Filing*)

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing 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 FIRST CLASS MAIL

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

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

Honorable Barry J. Schoch, PE, Secretary  
Pennsylvania Department of Transportation  
Commonwealth Keystone Building  
400 North Street, 9<sup>th</sup> Floor  
Harrisburg, PA 17120  
Attn: William J. Cressler, Chief Counsel

Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1925

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

Berks County Board of Commissioners  
Berks County Services Center  
633 Court Street, 13<sup>th</sup> Floor  
Reading, PA 19601  
Attn: Christian Y. Leinbach, Chairman

Berks County Planning Commission  
633 Court Street, 14<sup>th</sup> Floor  
Reading, PA 19604  
Attn: Glenn R. Knoblauch,  
Executive Director

Chester County Board of Commissioners  
313 West Market Street, Suite 6202  
P.O. Box 2748  
West Chester, PA 19380  
Attn: Terence Farrell, Chairman

Chester County Planning Commission  
601 Westtown Road, Suite 270  
P.O. Box 2747  
West Chester, PA 19380  
Attn: Ronald T. Bailey, Executive Director

Lancaster County Board of Commissioners  
Lancaster County Government Center  
150 North Queen Street  
7th Floor, Suite 715  
Lancaster, PA 17603  
Attn: Scott Martin, Chairman

Lancaster County Planning Commission  
150 North Queen Street, Suite 320  
Lancaster, PA 17603  
Attn: James Cowhey, AICP,  
Executive Director

Caernarvon Township Board of Supervisors  
3307 Main Street  
P.O. Box 294  
Morgantown, PA 19543  
Attn: Charles Byler, Chairman

Caernarvon Township Planning  
Commission  
3307 Main Street  
P.O. Box 294  
Morgantown, PA 19543  
Attn: Creeden Coulson, Chairman

Honey Brook Township Board of  
Supervisors  
500 Suplee Road  
Honey Brook, PA 19344  
Attn: Joe Fenstermacher, Chairman

Honey Brook Township Planning  
Commission  
500 Suplee Road  
Honey Brook, PA 19344

Caernarvon Township Board of Supervisors  
2112 Main Street  
Narvon, PA 17555  
Attn: Gary Van Dyke, Chairman

Caernarvon Township Planning  
Commission  
2147 Main Street  
Narvon, PA 17555  
Attn: Frank Diem, Chairman

U.S. Army Corps of Engineers  
Philadelphia District  
Regulatory Branch  
Wanamaker Building, 100 Penn Square East  
Philadelphia, PA 19107-3390  
Attn: Wayne Poppich

U.S. Army Corps of Engineers  
Baltimore District  
State College Field Office  
1631 South Atherton Street, Suite 102  
State College, PA 16801  
Attn: Amy Elliott

US Fish and Wildlife Service  
315 South Allen Street, Suite 322  
State College, PA 16801-4850  
Attn: Bonnie Dershem

PA Department of Conservation  
and Natural Resources  
Rachel Carson State Office Building  
PO Box 8767  
400 Market Street  
Harrisburg, PA 17105-8767  
Attn: Rebecca Bowen

Pennsylvania Game Commission  
2001 Elmerton Avenue  
Harrisburg, PA 17110-9797  
Attn: Olivia Mowery

Pennsylvania Fish and Boat Commission  
450 Robinson Lane  
Bellefonte, PA 16823-9620  
Attn: Christopher A. Urban

Berks County Conservation District  
1238 County Welfare Road, Suite 200  
Leesport, PA 19533  
Attn: Dan Greig, District Executive

Chester County Conservation District  
688 Unionville Road, Suite 200  
Kennett Square, PA 19348  
Attn: Christian E. Strohmaier, Manager

Lancaster County Conservation District  
1383 Arcadia Road, Room 200  
Lancaster, PA 17601  
Attn: Rebecca Buchanan  
E&S Project Manager

Senator Mike Folmer  
48th District  
400 South 8th Street  
101 Municipal Building  
Lebanon, PA 17042

Senator Mike Brubaker  
36th District  
301 East Main Street  
Lititz, PA 17543

Hon. Mark M. Gillen  
128th District  
29 Village Center Drive  
Suite A-7  
Reading, PA 19607

Hon. Scott Perry  
26th District  
1038 East Lincoln Highway  
Coatesville, PA 19320

Hon. Gordon Denlinger  
99th District  
390 East Main Street  
Suite 301  
Ephrata, PA 17522

Ivan S and Anna Mae Stoltzfus  
749 Todd Road  
Honey Brook, PA 19344

John Omar Jr. and Nancy Mae Stoltzfus  
32169 County Road 337  
Advance, MO 63730

Gideon E Jr. and Rose Marie Stoltzfus  
330 Todd Road  
Honey Brook, PA 19344

Samuel J Jr. and Mary B Stoltzfus  
115 Todd Road  
Honey Brook, PA 19344

Jonas B and Deborah Ann Stoltzfus  
355 White School Road  
Honey Brook, PA 19344

Benuel E and Sara B Stoltzfus  
245 Given Road  
Honey Brook, PA 19344

Keith L and Malinda E Mast  
191 Given Road  
Honey Brook, PA 19344

Mark E and Linda M Stoltzfus  
Field Stone Road  
Honey Brook, PA 19344

Helen Rovinski  
Westwood 4H  
PO Box 125  
Cornwall, PA 17016

William D and Marlene A Oatman  
830 Talbottsville Road  
Honey Brook, PA 19344

Jeffrey A & Roberta K Metzler  
2894 Oak Lane  
Morgantown, PA 19543

Elizabeth J Means  
257 Supplee Road  
Honey Brook, PA 19344

Paul N and Barbara M Brubacher  
2910 Best Road  
Morgantown, PA 19543

Raymond Z and Darla J Brubacher  
2970 Best Road  
Morgantown, PA 19543

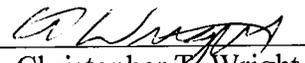
Glenn Z & Nancy K Brubacher  
32 Limekiln Lane  
Morgantown, PA 19543

Caernavon Township Municipal Sewer  
Authority  
PO Box 291  
Morgantown, PA 19543

Caernavon Township Authority  
PO Box 188  
Morgantown, PA 19543

Bernard and Henrietta Hankin  
PO Box 562  
Exton, PA 19341

Date: January 10, 2014

  
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Christopher T. Wright

**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 siting and construction of the double- :  
circuit 138/69 kV Honey Brook-Twin :                   Docket No. A-2013-2392102  
Valley transmission line in portions of :  
Caernarvon Township, Berks County, :  
Honey Brook Township, Chester County :  
and Caernarvon Township, Lancaster :  
County, Pennsylvania :

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

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**TO ADMINISTRATIVE LAW JUDGE  
DAVID A. SALAPA:**

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  
12<sup>th</sup> 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](mailto:perussell@pplweb.com) and David B. MacGregor at [dmacgregor@postschell.com](mailto:dmacgregor@postschell.com).

## **II. PROCEDURAL HISTORY**

2. This proceeding was initiated on November 7, 2013, when PPL Electric filed the “Application of PPL Electric Utilities Corporation Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the Double-Circuit 138/69 kV Honey Brook – Twin Valley Transmission Line in Portions of Caernarvon Township in Berks County, Honey Brook Township in Chester County and Caernarvon Township in Lancaster County, Pennsylvania” (“Siting Application”), which was docketed at Docket No. A-2013-2392102.

3. In the Siting Application, PPL Electric is seeking approval from the Pennsylvania Public Utility Commission (“Commission”) to site and construct the Honey Brook – Twin Valley double-circuit 138/69 kV Transmission Line to connect the Honey Brook and Twin Valley 69-12 kV distribution substations (the “Project”). The new double-circuit Transmission Line will be approximately 5.3 miles in length and cost an estimated \$10.5 million to site, design and construct. The purpose of the Project is to reinforce the 138/69 kV systems in portions of Chester, Berks, and Lancaster Counties by providing an additional 138/69 kV source into the Twin Valley and Honey Brook Substations. The Project will enable PPL Electric to restore service to all customers served through the Honey Brook, Twin Valley and Morgantown Substations in the event of an outage of the transmission lines that supply them.

4. On November 21, 2013, a Notice was issued scheduling an Initial Prehearing Conference before the Honorable Administrative Law Judge David A. Salapa (the “ALJ”) on Thursday, January 16, 2014, in Hearing Room 3, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120.

5. On November 21, 2013, the ALJ issued a Prehearing Order #1 explaining, among other things, how parties may participate in the above-captioned matter and directing that protests or petitions for intervention shall be filed with the Commission's Secretary on or before January 9, 2014.

6. On December 11, 2013, the Planning Commission of Berks County filed comments complimenting PPL Electric for its efforts to enhance and improve the electric system serving the area. In its comments, the Planning Commission of Berks County also identified certain measures to be considered by PPL Electric in conjunction with the construction of the proposed Project.

7. On December 16, 2013, a formal protest to the Project was filed by Michael and Patricia Fleck.

8. As of the date of this Prehearing Memorandum, no other protests or petitions to intervene have been served on PPL Electric.

9. Pursuant to 52 Pa. Code § 5.222(d), PPL Electric herein files this Prehearing Conference Memorandum.

### **III. ISSUES**

10. PPL Electric intends to demonstrate that the construction of the Honey Brook – Twin Valley double-circuit 138/69 kV Transmission Line is reasonably necessary to improve service reliability, resolve projected reliability violations, and restore service to all customers served through the Honey Brook, Twin Valley and Morgantown substations in the event of an outage of the transmission lines that supply them.

11. PPL Electric also intends to show that the Project will enable PPL Electric to (i) restore service to customers quicker when severe weather events occur and (ii) maintain reliable service despite significant load growth in the area.

12. PPL Electric intends to demonstrate that the Project will not create any unreasonable risk of danger to the health and safety of the public.

13. PPL Electric intends to show that the Project will be constructed 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.

14. PPL Electric intends to demonstrate that the Project 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.

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

**IV. WITNESSES**

16. 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>
Douglas Grossman 2 North Ninth Street Allentown, PA 18101	Overview of the Project; describing the process employed by PPL Electric in developing, preparing and filing the Application; providing an overview of the siting process used for this Project; explaining the retention of Louis Berger Group, Inc. to assist it in selecting the routes for the transmission lines; explaining the process within PPL Electric for selecting the transmission line routes; explaining PPL Electric’s corporate policy on measures to mitigate the impact of a transmission line; describing the public outreach program employed by PPL Electric for this Project; summarizing the benefits of this Project for PPL Electric and its customers.
Lisa Krizenoskas 2 North Ninth Street Allentown, PA 18101	Addressing the need for the Project; describing PPL Electric’s system planning process and explaining the role of PJM, Interconnection, LLC; explaining that the proposed system will solve identified problems; explaining the benefits of the Project.

Peter Sparhawk 350 Eagleview Blvd Suite 250 Exton, PA 19341	Explaining the selection of the routes for the transmission lines associated with the Project.
Kyle Swartzentruber 2 North Ninth Street Allentown, PA 18101	Explaining the design features and safety of the proposed Project.
JoMarie Jenkins 501 North Reading Road, Ephrata, PA 17522	Explaining the process that PPL Electric used to attempt to acquire the rights-of-way and easements necessary for the Project; and describing the property over which PPL Electric seeks a right-of-way and easement for the transmission lines associated with the Project.
Stephen J. Dahl 165 Beach Lack Highway, Honesdale, PA 18431	Explaining PPL Electric's vegetation management practices.

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

**V. DISCOVERY**

18. 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**

19. 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	January 16, 2014
PPL Electric Direct	January 31, 2014
Other Parties' Direct	February 28, 2014
Rebuttal	March 21, 2014
Surrebuttal	April 4, 2014

Evidentiary Hearings April 14-15, 2014

Initial Briefs May 12, 2014

Reply Briefs May 30, 2014

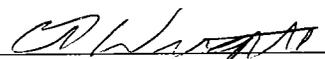
**VII. SETTLEMENT**

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

21. 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)  
Associate General Counsel  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
Voice: 610.774.4254  
Fax: 610.774.6726  
E-mail: perussell@pplweb.com

  
David B. MacGregor (I.D. #28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Voice: 215.587.1197  
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Of Counsel:  
Post & Schell, P.C.

Christopher T. Wright (ID #203412)  
Post & Schell, P.C.  
12th Floor, 17 North Second Street  
Harrisburg, PA 17101-1601  
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Fax: 717.731.1985  
E-mail: cwright@postschell.com

Dated: January 10, 2014

Attorneys for PPL Electric Utilities Corporation