

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification of PPL Electric :  
Utilities Corporation, Filed Pursuant to :  
52 Pa. Code Chapter 57 Subchapter G, : Docket No. A-2014-\_\_\_\_\_  
for Approval to Construct Two New :  
500 Foot 230 kV Transmission Lines in :  
Clinton Township, Lycoming County, :  
Pennsylvania to Interconnect a New :  
Independent Power Producer to the :  
Electric Grid :

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**LETTER OF NOTIFICATION**

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TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric”) hereby files, pursuant to 52 Pa. Code § 57.72(d), this Letter of Notification to request approval from the Pennsylvania Public Utility Commission (“Commission”) to construct two new double-circuit 230 kV transmission lines to interconnect the proposed Panda Patriot Power Generation Plant (“Panda Plant”) with the electric grid. Upon Commission approval, the Panda Plant will be interconnected to the PPL Electric transmission system by constructing two new double-circuit 230 kV transmission lines that will extend approximately 500 feet between the existing double-circuit Montour-Elimsport & Montour-Clinton 230 kV Transmission Line and a new Saegers 230 kV Switchyard (hereinafter, the “Project”). The Panda Plant developer, Panda Patriot LLC, will then build one single-circuit 230 kV transmission line that will extend approximately 0.5 miles between the new 230 kV switchyard and the Panda Plant.<sup>1</sup> The proposed two new 230 kV transmission lines will be

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<sup>1</sup> The new line from the Saegers 230 kV Switchyard to the Panda Plant will be named the Saegers-Panda Patriot 230 kV Line. PPL Electric is not asking for Commission approval to build this particular transmission line because it will be constructed and owned by the Panda Patriot LLC. There are no plans in the foreseeable future for PPL Electric to own or operate the Saegers-Panda Patriot 230 kV Line.

located in Clinton Township, Lycoming County, Pennsylvania. PPL Electric has provided information regarding this Project to these political subdivisions, which have not objected to the Project.

The proposed Project is necessary to connect the Panda Plant to the electric grid. The Project has been reviewed and approved through the PJM Interconnection LLC (“PJM”) generation interconnection process. Subject to the Commission’s approval, construction is scheduled to begin in November of 2014 to support the mid-2015 in-service date of the Panda Plant. In support thereof, PPL Electric states as follows:

**I. INTRODUCTION**

1. This Letter of Notification is filed by PPL Electric, a public utility that provides electric distribution, transmission, and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission.

2. PPL Electric’s address is PPL Electric Utilities Corporation, Two North Ninth Street, Allentown, Pennsylvania 18101.

3. PPL Electric’s attorneys are:

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PPL Electric's attorneys are authorized to receive all notices and communications regarding this Letter of Notification.

4. PPL Electric furnishes electric service to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania. PPL Electric is a "public utility" and an "electric distribution company" as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 102, 2803.

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. This Letter of Notification includes the following accompanying attachments:

- Attachment 1 Necessity Statement.
- Attachment 2 Engineering Description.
- Attachment 3 Description of the Right-of-Way.
- Attachment 4 PPL Electric Design Criteria and Safety Practices.

7. This Letter of Notification and accompanying Attachments, which are incorporated herein by reference, contain all the information required by 52 Pa. Code § 57.72(d)(4).

## **II. THE PROJECT**

### **A. NEED FOR THE PROJECT**

#### **1. Existing System**

8. The existing double-circuit Montour-Elimsport & Montour-Clinton 230 kV Transmission Line currently serves load in Lycoming County.

9. The existing double-circuit Montour-Elimsport & Montour-Clinton 230 kV Transmission Line is installed on double-circuit monopole towers. The Montour-Elimsport 230 kV circuit extends approximately 22.4 miles from the Montour 230 kV Switchyard to the Elimsport 230 kV Switchyard. The Montour-Clinton 230 kV circuit extends approximately 10.5 miles from the Montour 230 kV Switchyard to the Clinton 230 kV Switchyard.

10. A description and one-line diagram of the existing system is provided in the Necessity Statement included as Attachment 1 to this Letter of Notification.

#### **2. Need for the Project**

11. The Panda Plant is a natural gas, combined-cycle power plant planned to be constructed by Panda Patriot LLC in Clinton Township, Lycoming County, Pennsylvania. A description of the 765 MW Panda Plant to be constructed by Panda Patriot LLC is provided in Attachment 1 to this Letter of Notification. In order to get the power produced from domestic natural gas production to the electric market, the Panda Plant must be interconnected with the electric grid.

12. Transmission Owners, such as PPL Electric, are required by federal law to provide open access to their transmission systems. As explained below, and in Attachment 1 to this Letter of Notification, through the PJM Interconnection LLC (“PJM”) generation interconnection process, PJM and PPL Electric determined that the proposed Project is necessary to connect the Panda Plant to the electric grid.

13. PJM is a Federal Energy Regulatory Commission (“FERC”) approved Regional Transmission Organization (“RTO”) charged with ensuring the reliability of the electric transmission system under its functional control and coordinating the movement of wholesale electricity in all or parts of thirteen states and the District of Columbia, including most of Pennsylvania and New Jersey. PPL Electric is a member of PJM.

14. As a FERC-accepted RTO, PJM administers the process for the interconnection of all new generation facilities to the PJM Transmission Grid, pursuant to the PJM Open Access Transmission Tariff – Part VI (Interconnections with the Transmission System), Subpart A – Generation Interconnection Procedures. PJM’s queue-based interconnection process offers developers the flexibility to explore their respective generation interconnection business opportunities, while at the same time evaluating the feasibility and impacts of interconnecting the generating unit into the existing transmission system. A description of PJM’s interconnection procedures is provided in Attachment 1 to this Letter of Notification.

15. The location of the planned Panda Plant takes advantage of the abundant natural gas resources in the area, as well as its proximity to existing high voltage transmission lines. The Panda Plant is located approximately 0.5 miles south of PPL Electric’s existing double-circuit Montour-Elmsport & Montour-Clinton 230 kV Transmission Line near Saegers Station Road in Clinton Township, Lycoming County, Pennsylvania.

16. The Panda Plan plant applied for and received PJM approval to interconnect with PPL Electric’s double-circuit Montour-Elmsport & Montour-Clinton 230 kV Transmission Line as follows. Through the PJM interconnection process, PJM and PPL Electric determined that the interconnection of the Panda Plant with the PPL Electric’s transmission system will require a new 230 kV switchyard that will tie into the existing double-circuit Montour-Elmsport &

Montour-Clinton 230 kV Transmission Line. The point of interconnection will occur at the new 230 kV switchyard.

17. The need for this Project, including a description of the Panda Plant interconnection request and PJM approval, is provided in Attachment 1 to this Letter of Notification.

## **B. THE PROPOSED PROJECT**

18. In order to interconnect the Panda Plant to the electric grid, PPL Electric proposes to interconnect the existing double-circuit Montour-Elimsport & Montour-Clinton 230 kV Transmission Line with a new 230 kV switchyard. The Panda Plant developer, Panda Patriot LLC, will then build one single-circuit 230 kV transmission line that will extend approximately 0.5 miles between the new 230 kV switchyard and the Panda Plant.<sup>2</sup>

19. The new 230 kV switchyard, the Saegers 230 kV Switchyard, will be located adjacent to the existing double-circuit Montour-Elimsport & Montour-Clinton 230 kV Transmission Line near Saegers Station Road in Montgomery Borough, Lycoming County, Pennsylvania. Under the PJM-approved Interconnection Construction Service Agreement, the required new Saegers 230 kV Switchyard will be constructed by Panda Patriot LLC. Upon completion and receipt of all necessary approvals and permits, Panda Patriot LLC will transfer the Saegers 230 kV Switchyard to PPL Electric, which will then own and operate the Switchyard.

20. In order to interconnect the double-circuit Montour-Elimsport & Montour-Clinton 230 kV Transmission Line with the Saegers 230 kV Switchyard, PPL Electric will construct two new double-circuit 230 kV transmission lines that will extend approximately 500 feet between the Saegers 230 kV Switchyard and the existing Montour-Elimsport & Montour-Clinton 230 kV

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<sup>2</sup> PPL Electric is not asking for Commission approval to build this particular transmission line because it will be constructed and owned by the Panda Patriot LLC. There are no plans in the foreseeable future for PPL Electric to own or operate the Saegers-Panda Patriot 230 kV Line.

Transmission Line. A description and one-line diagram of the proposed Project is provided in the Necessity Statement included as Attachment 1 to this Letter of Notification.

21. The existing Montour-Elimsport & Montour-Clinton 230 kV Transmission Line currently is supported on double-circuit monopole towers. In order to interconnect the existing double-circuit Montour-Elimsport & Montour-Clinton 230 kV Transmission Line with the Saegers 230 kV Switchyard, two of the existing towers will be removed and replaced with two double-circuit, weathering steel monopoles.

22. Both the 230 kV steel monopoles will be approximately 130 feet in height. Both monopoles will be self-supported on concrete caisson foundations. A depiction of the type of monopoles used for this Project is provided at the end of Attachment 2 to this Letter of Notification.

23. Each new 230 kV circuit will utilize three power conductors, one steel overhead ground wire for lightning protection, and one fiber optic cable used for communications between the transmission system facilities. The minimum conductor-to-ground clearance will be 35 feet, which occurs at a maximum conductor temperature of 125° C. An engineering description of the Project is provided in Attachment 2 to this Letter of Notification.

24. The total estimated cost of the proposed Project is \$12.4 million, which includes \$3 million for the transmission line work and \$9.4 million for the switchyard work.<sup>3</sup> The entire cost of the Project will be paid for Panda Patriot LLC.

25. Upon Commission approval, the Project has a scheduled construction start date of November 2014 to support the mid-2015 in-service date of the Panda Plant.

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<sup>3</sup> The estimated cost for the proposed Project is an order-of-magnitude estimate developed using averages of recent costs for similar projects and without an in-depth analysis of filed investigation. The estimated cost is subject to change as the constructability of the Project, sequence of construction, and other factors that may affect cost are identified and analyzed as the Project progresses.

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

26. The proposed Project will not create any unreasonable risk of danger to the public health or safety.

27. The Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electrical Safety Code (“NESC”) minimum standards and all applicable legal requirements. Descriptions PPL Electric’s design criteria and safety practices are provided in Attachment 4 to this Letter of Notification.

28. Consistent with its Magnetic Field Management Program, PPL Electric will construct the Project for ground clearances that are a minimum of five feet higher than the required NESC minimum ground clearance for 230 kV lines in order to reduce the magnetic field exposure. The 230 kV lines also will be reverse phased to further minimize the potential exposure to magnetic fields. A description of PPL Electric’s Magnetic Field Management Program is provided in Attachment 2 to this Letter of Notification.

### **IV. DESCRIPTION OF RIGHT-OF-WAY**

29. The Panda Plant will be located in Clinton Township, Lycoming County, Pennsylvania on approximately 80 acres of land zoned as Heavy Industrial (I-2).

30. The Project that is the subject of this Letter of Notification -- two new 500-foot long 230 kV transmission lines to be constructed, owned, and operated by PPL Electric -- will be located near Saegers Station Road in Montgomery Borough, Lycoming County, Pennsylvania. Both proposed 230 kV transmission lines will be located within the existing right-of-way for the Montour-Elimsport & Montour-Clinton 230 kV Transmission Line and the proposed site for the new Seager 230 kV Switchyard to be owned and operated by PPL Electric.

31. Both the existing right of way and site for the Saegers 230 kV Switchyard are located in areas that contain existing electrical facilities and industrial buildings within Montgomery Borough, Lycoming County. No additional property rights are required to complete this Project.

32. An aerial plot plan is provided at the end of Attachment 3 to this Letter of Notification.

33. Land use impacts are anticipated to be minimal due to the fact that the Project is located in areas that currently contain existing PPL Electric facilities, manufacturing facilities, and a railroad. In addition, the surrounding properties are currently used for industrial operations.

34. Where possible, PPL Electric will use previously established access roads for construction to further reduce interference with existing land uses.

35. The Project area previously has been cleared of vegetation. As a result, limited vegetation management will be required for this project. In areas where vegetation management is required to complete the project, PPL Electric will apply its "Specifications for Initial Clearing and Control of Vegetation On or Adjacent to Electric Line Right-of-Way Through Use of Herbicides, Mechanical and Hand Clearing Techniques" to mitigate any impacts.

36. No communication towers, pipelines, or other utilities will be affected by the proposed Project.

37. PPL Electric does not anticipate any interference with airport operations because of the distance from the Project area, the presence of existing electrical facilities in the Project area, and the similar height of the new facilities and the existing facilities.

38. The Project area contains no state lands, national parks, state parks, or local parks.

39. The Project will not traverse or affect any unique geological, scenic, or natural areas.

40. The Project will not affect any recreational areas or natural landmarks.

41. The Project area was reviewed with the Pennsylvania Historical and Museum Commission (“PHMC”). The PHMC has concluded that the Project will have minimal impacts to cultural and archaeological resources, and that no further archaeological work is necessary for the Project.

42. PPL Electric will avoid impacts to wetlands and streams to the maximum extent practical. PPL Electric will obtain all necessary permits from the Pennsylvania Department of Environmental Protection and the United States Army Corps of Engineers and will comply with all of the terms and conditions placed on those permits.

43. PPL Electric will acquire any required soil erosion and sedimentation control permits and will comply with any conditions placed on those permits.

44. Both Panda Patriot LLC and PPL Electric PPL Electric have consulted with state and federal agencies to obtain information regarding endangered and threatened species in close proximity to the Project. Both Panda Patriot LLC and PPL Electric PPL Electric have reviewed the Pennsylvania Natural Diversity Inventory records under the jurisdiction of the Pennsylvania Department of Conservation and Natural Resources, the Pennsylvania Fish and Boat Commission, the Pennsylvania Game Commission, and the U.S. Fish and Wildlife Service. Based on this review, these agencies have reported that the Project will not impact any threatened and endangered species and/or special concern species and resources located within the Project area.

**V. NOTICE**

45. PPL Electric has provided information regarding the Project to representatives of Montgomery Borough and Lycoming County. These entities have not objected to the proposed Project.

46. Copies of this Letter of Notification will be served on the governmental agencies, municipalities, and other public entities agencies in accordance with 52 Pa. Code § 57.72(d)(3).

47. All owners of land subject to the right-of-way and easement were notified by PPL Electric representatives and sent a letter summarizing the proposed Project. Further, copies of this Letter of Notification will be served on these landowners in accordance with 52 Pa. Code § 57.72(d)(3).

**VI. LETTER OF NOTIFICATION**

48. PPL Electric is proceeding by means of a Letter of Notification, instead of a full Application, pursuant to the Commission's regulations at 52 Pa. Code § 57.72(d)(1)(vi).

49. The proposed Project qualifies for use of a Letter of Notification because the proposed new 230 kV transmission lines required to interconnect the Panda Plant with the electric grid are less than two miles, *i.e.*, 500 feet.

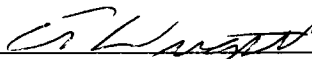
50. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the proposed Project will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71, *et seq.*

**VII. CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve the proposed construction of two new double circuit 230 kV transmission lines in Montgomery Borough, Lycoming County, Pennsylvania to interconnect the proposed Panda Patriot Power Generation Plant with the electric grid, as explained above and in the Attachments hereto.

Respectfully submitted,

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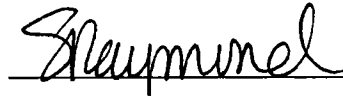
Date: February 10, 2014

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: 2/6/14



Stephanie Raymond