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File #: 151801

September 12, 2014

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: 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 North Lancaster-Honey Brook #1 & #2 138/69 kV Transmission Lines in Lancaster County, Pennsylvania - Docket Nos. A-2014-2430565, et al.

Dear Secretary Chiavetta:

Enclosed for filing is the Prehearing Conference Memorandum of PPL Electric Utilities Corporation for the above-referenced proceedings. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Christopher T. Wright

CTW/jl

Enclosures

cc: Certificate of Service
Honorable Susan D. Colwell

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

Pennsylvania Historical and
Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Fl.
400 North Street
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, 9th Floor
Harrisburg, PA 17120
Attn: William J. Cressler, Chief Counsel

Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
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

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

Brecknock Township Board of Supervisors
1026 Dry Tavern Rd. (Rt. 897)
Denver, PA 17517
Attn: D. Garth Wise, Chairman

Brecknock Township Planning Commission
1026 Dry Tavern Rd. (Rt. 897)
Denver, PA 17517
Attn: Harry Lehman, Chairman

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

East Earl Township Board of Supervisors
4610 Division Highway
East Earl, PA 17519
Attn: David Zimmerman, Chairman

East Earl Township Planning Commission
4610 Division Highway
East Earl, PA 17519
Attn: Adam Zimmerman, Chairman

Metropolitan Edison Company
Attn: Mr. Donald Brennan, President
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001

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

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

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

Hon. Gordon Denlinger
The Mountain Springs Hotel Complex
390 E. Main Street, Suite 301
Ephrata, PA 17522

Paul D. & Michelle Bias
215 Boulder Hill Road
Mohnton, PA 19540

J Roys Inc.
935 Stone Hill Road
Denver, PA 19517

Merle Z. and Sharon Eberly
1328 Oaklyn Drive
Narvon, PA 17555

PPL Electric Utilities
C/O PPL Re Tax
2 N Ninth Street (GENTW2)
Allentown, PA 18101

Lawrence Martin
1490 Reading Rd
Mohnton, PA 19540

Elvin Martin Leinbach
Susanne Hoover Leinbach
218 Boulder Hill Road
Mohnton, PA 19540

David and Sylvia Martin
1394 Oaklyn Drive
Mohnton, PA 19540

Ronald E. & Rose Ann Shrom
P.O. Box 100
Bowmansville, PA 17507

Phares M. & Marion M. Hurst
290 E Maple Grove Road
Narvon, PA 17555

Noah S. & Martha W. Brubaker
1311 Hilltop Road
Narvon, PA 17555

Elvin H. & Roseanne N. Brubaker
1161 Oaklyn Drive
Narvon, PA 17555

Harvey R. & Arlene Zimmerman
1081 Oaklyn Drive
Narvon, PA 17555

John R. & Nancy E. Zimmerman
1087 Silver Hill Road
Narvon, PA 17555

Daniel L. & Eileen H. Huber
1050 Silver Hill Road
Narvon, PA 17555

Norman Zimmerman
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East Earl, PA 17519

Lawrence W. & Erma M. Leinbach
258 Laurel Road
East Earl, PA 17519

Glen O. & Alice M. Ringler
279 E Black Creek Road
East Earl, PA 17519

Harvey W. & Irene S. Zimmerman
211 E Black Creek Road
East Earl, PA 17519

Steven S. & Amanda K. Smucker
342 E Black Creek Road
East Earl, PA 17519

Brubaker Family Trust
C/O Irvin Z. Brubaker
834 Lambert Road
Narvon, PA 17555

Reuben S. & Mabel W. Brubacher
592 Lambert Road
Narvon, PA 17555

Paul K. & Esther Oberholtzer
540 Lambert Road
Narvon, PA 17555

Leonard M. & Mary Ann. Brubacher
582 Lambert Road
Narvon, PA 17555

Morwood Partnership
433 S Kinzer Avenue
Apt 363
New Holland, PA 17557

Warren & Linda Sensenig
355 Hammertown Road
Narvon, PA 17555

Raymond Lee & Mary Ann King
319 Hammertown Rd
Narvon, PA 17555

John Glen & Kathy M. Zimmerman
229 Hammertown Road
Narvon, PA 17555

Glen N. Martin, et al.
222 Water Street
Narvon, PA 17555

Edwin N. & Louella M. Zeiset
2223 Main Street
Narvon, PA 17555

Floyd W. & Anna Mary Ringler
2221 Main Street
Narvon, PA 17555

Edwin H. & Barbara S Zimmerman
2300 Main Street
Narvon, PA 17555

Linda Kling
2226 Main Street
Narvon, PA 17555

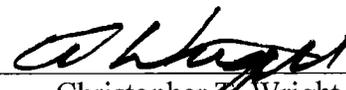
Clarence Z. & Alta R. Garman
248 Bridgeville Road
East Earl, PA 17519

Scott Klemas
1200 Millrace Run
Narvon, PA 17555

Audrey Imhoff
184 Boulder Hill Road
Mohnton, PA 19540

Randolph & Terri Kring
1427 Oaklyn Drive
Mohnton, PA 19540

Date: September 12, 2014



Christopher Z. 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 North : Docket No. A-2014-2430565
Lancaster-Honey Brook #1 & #2 138/69 kV :
Transmission Lines in Lancaster County, :
Pennsylvania :

Application of PPL Electric Utilities :
Corporation Under 15 Pa.C.S. § 1511(c) For A :
Finding And Determination That The Service :
To Be Furnished By The Applicant Through :
Its Proposed Exercise Of The Power Of :
Eminent Domain To Acquire Right-Of-Way :
And Easement Over A Certain Portion Of The :
Lands Of Merle Z. Eberly And Sharon Eberly : Docket No. A-2014-2430582
In Brecknock Township, Lancaster County, :
Pennsylvania For Siting And Construction Of :
Transmission Lines Associated With The :
Proposed North Lancaster-Honey Brook :
Project Is Necessary Or Proper For The :
Service, Accommodation, Convenience Or :
Safety Of The Public :

Application of PPL Electric Utilities :
Corporation Under 15 Pa.C.S. § 1511(c) For A :
Finding And Determination That The Service :
To Be Furnished By The Applicant Through :
Its Proposed Exercise Of The Power Of :
Eminent Domain To Acquire Right-Of-Way :
And Easement Over A Certain Portion Of The :
Lands Of J. Roys Inc., c/o Mr. Grant Wise In : Docket No. A-2014-2430579
Brecknock Township, Lancaster County, :
Pennsylvania For Siting And Construction Of :
Transmission Lines Associated With The :
Proposed North Lancaster-Honey Brook :
Project Is Necessary Or Proper For The :
Service, Accommodation, Convenience Or :
Safety Of The Public :

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

**TO ADMINISTRATIVE LAW JUDGE
SUSAN D. COLWELL:**

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 Devin T. Ryan at dryan@postschell.com.

II. PROCEDURAL HISTORY

2. This proceeding was initiated on June 27, 2014, 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 North Lancaster-Honey Brook #1 & #2 138/69 kV Transmission Lines in Lancaster County, Pennsylvania” (“Siting Application”), which was docketed at Docket No. A-2014-2430565.

3. Together with the Siting Application, PPL Electric filed and served the following attachments in support of the Siting Application:

- Executive Summary
- Attachment 1 Commission Regulation Cross-Reference Matrix
- Attachment 2 Necessity Statement
- Attachment 3 Environmental Analysis
- Attachment 4 Alternatives and Siting Analysis
- Attachment 5 Engineering Description
- Attachment 6 List of Owners of Property within the Right of Way
- Attachment 7 Agency Permit Requirements
- Attachment 8 List of Governmental Agencies, Municipalities and Other Public Entities Receiving the Application
- Attachment 9 List of Governmental Agencies, Municipalities and Other Public Entities Contacted
- Attachment 10 List of Locations Application Can Be Viewed by the Public
- Attachment 11 PPL Electric Magnetic Field Management Plan
- Attachment 12 PPL Electric Vegetation Management Program
- Attachment 13 PPL Electric Design Criteria and Safety Practices
- Attachment 14 Agency Coordination
- Attachment 15 Cultural Resources Report
- Attachment 16 Public Notice Requirements

4. On June 27, 2014, PPL Electric also filed three (3) Applications under 15 Pa.C.S. § 1511(c) seeking findings and determination that the service to be furnished by the Company through its proposed exercise of the power of eminent domain to acquire rights-of-way and easements over the following lands for the siting and construction of transmission lines

associated with the proposed North Lancaster-Honey Brook Project is necessary or proper for the service, accommodation, convenience or safety of the public:

Merle Z. Eberly and Sharon Eberly in Brecknock Township, Lancaster County, Pennsylvania, Docket No. A-2014-2430582;

J. Roys Inc., c/o Mr. Grant Wise in Brecknock Township, Lancaster County, Pennsylvania, Docket No. A-2014-2430579;

Paul D. Bias and Michelle Bias in Brecknock Township, Lancaster County, Pennsylvania, Docket No. A-2014-2430635;

5. The above-described three (3) eminent domain applications filed by PPL Electric are hereinafter collectively referred to as the “Eminent Domain Applications.”

6. By Secretarial Letter dated April 27, 2012, PPL Electric was served with the Formal Complaint filed by Scott Klemas at Docket No. C-2012-2300834 (“Klemas Complaint”). The Klemas Complaint raises issues related to the siting and route selection of the proposed transmission lines associated with the North Lancaster-Honey Brook Project. On September 5, 2014, PPL Electric filed a Certificate of Satisfaction pursuant to 52 Pa.Code § 5.24(b), advising that Scott Klemas no longer wishes to pursue his Formal Complaint and requesting that the Klemas Complaint be withdrawn and marked closed.

7. By Secretarial Letter dated May 2, 2012, PPL Electric was served with the Formal Complaint filed by Phares M. Hurst at Docket No. C-2012-2301873 (“Hurst Complaint”). The Hurst Complaint raises issues related to the siting and route selection of the proposed transmission lines associated with the North Lancaster-Honey Brook Project.

8. By a Secretarial Letter dated May 17, 2012, PPL Electric was served with a Complaint filed by Merle and Sharon Eberly at Docket No. C-2012-2304738 (“Eberly Complaint”). The Eberly Complaint raises issues related to the siting and route selection of the proposed transmission lines associated with the North Lancaster-Honey Brook Project.

9. By Secretarial Letter dated January 14, 2013, PPL Electric was served with the Formal Complaint filed by Audrey Imhoff at Docket No. C-2013-2343022 (“Imhoff Complaint”). The Imhoff Complaint raises issues related to the siting and route selection of the proposed transmission lines associated with the North Lancaster-Honey Brook Project.

10. By Secretarial Letter dated January 15, 2013, PPL Electric was served with the Formal Complaint filed by Randolph and Terri Kring at Docket No. C-2013-2343256 (“Kring Complaint”). The Kring Complaint raises issues related to the siting and route selection of the proposed transmission lines associated with the North Lancaster-Honey Brook Project.

11. In the First Prehearing Order, issued July 8, 2014, Administrative Law Judge Susan D. Colwell (“ALJ”) consolidated the Eminent Domain Applications, Eberly Complaint, Hurst Complaint, Klemas Complaint, Imhoff Complaint, and Kring Complaint with the Siting Application, at Docket No. A-2014-2430565, for purposes of discovery, litigation, and disposition.

12. On July 18, 2014, a Hearing Notice was issued scheduling an Initial Prehearing Conference on September 18, 2014, at 10:00 AM in Hearing Room 1, Plaza Level, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120.¹

13. On August 27, 2014, PPL Electric filed Affidavits attesting that notice of the Siting Application was published weekly for two consecutive weeks in newspapers of general circulation within each municipality in which the proposed North Lancaster-Honey Brook #1 & #2 138/69 kV Transmission Lines are to be located.

14. Pursuant to the Prehearing Order No. 1, protests and petitions to intervene were required to be filed on or before September 12, 2014. On September 12, 2014, J. Roys Inc. filed

¹ On August 25, 2014, a Corrected Hearing Notice was issued that corrected the docket numbers listed in the Hearing Notice issued on July 18, 2014.

a protest to the Siting Application and the eminent domain application at Docket No. A-2014-2430579. As of the date of this Prehearing Memorandum, no other protests, petitions to intervene, or notices of appearance have been served on PPL Electric other than the Formal Complaints set forth in Paragraphs 6 through 10, *supra*.

III. ISSUES

15. PPL Electric intends to demonstrate that the siting and construction of the proposed North Lancaster-Honey Brook Project in Lancaster County, Pennsylvania is reasonably necessary to resolve planning and reliability violations and to reinforce the existing 138/69 kV systems serving approximately 32,000 customers in Honey Brook and Caernarvon Townships in Chester, Berks, and Lancaster Counties. The North Lancaster-Honey Brook Project will bring a new alternate source of supply closer to the growing load centers and will reduce the line length and loading on the existing 138/69 kV lines serving the area.

16. PPL Electric intends to demonstrate that the proposed routes for the North Lancaster-Honey Brook #1 & #2 138/69 kV Transmission Lines were selected after extensive public input and a detailed analysis, which included a comprehensive environmental inventory, identification and analysis of alternative routes, and selection of the preferred routes. PPL Electric will demonstrate that it identified and compared route alternatives based upon a detailed analysis and balance of comments from the public, societal concerns, environmental impacts, engineering considerations, and cost. PPL Electric intends to demonstrate that, overall, the preferred routes will have substantially less impact on the natural and built environments, land use, and citizens in Lancaster County than alternative routes would have.

17. PPL Electric intends to show that the proposed North Lancaster-Honey Brook Project will not create an unreasonable risk of danger to the health and safety of the public.

18. PPL Electric intends to demonstrate that the proposed North Lancaster-Honey Brook Project will be constructed and operated in compliance with applicable statutes and regulations.

19. PPL Electric intends to demonstrate that its proposed exercise of the power of eminent domain to acquire rights-of-way and easements for the construction, operation and maintenance of the proposed North Lancaster-Honey Brook Project over certain portions of the lands identified in the Eminent Domain Applications is necessary or proper for the service, accommodation, convenience, or safety of the public. PPL Electric intends to show that the service to be furnished by PPL Electric through the proposed and related facilities is necessary or proper to resolve planning and reliability violations and to reinforce the existing 138/69 kV systems serving approximately 32,000 customers in Honey Brook and Caernarvon Townships in Chester, Berks, and Lancaster Counties.

IV. WITNESSES

20. 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>Statement Nos.</u>	<u>Topics</u>
Douglas J. Grossman	PPL Electric St. No. 1	Providing an overview of the Project; describing the process employed by PPL Electric in developing, preparing, and filing the Siting Application; providing an overview of the siting process used for this Project; summarizing the decision making process within PPL Electric for selecting the transmission line route; explaining PPL Electric's corporate policy on measures to mitigate the impacts of transmission lines; and describing the public outreach program employed by PPL Electric for this Project.

<u>Witness</u>	<u>Statement Nos.</u>	<u>Topics</u>
Joseph J. Canterino	PPL Electric St. No. 2	Explaining PPL Electric's system planning process and the role of PJM in that process; summarizing the existing system serving the area of Honey Brook and Caernarvon Townships in Chester, Berks, and Lancaster Counties; detailing the need to reinforce the transmission system in this area; and describing the need for the North Lancaster-Honey Brook Project and how it will improve the reliability of service in the area.
Peter Sparhawk	PPL Electric St. No. 3	Explaining the selection of the route for the proposed North Lancaster-Honey Brook Project.
Kyle D. Swartzentruber	PPL Electric St. No. 4	Explaining the major design features of the North Lancaster-Honey Brook Project; discussing the safety features incorporated into the design of the North Lancaster-Honey Brook Project; and detailing PPL Electric's Magnetic Field Management Program and how it has been incorporated into the design of the North Lancaster-Honey Brook Project.
JoMarie Jenkins	PPL Electric St. No. 5	Explaining the process used by PPL Electric to attempt to acquire rights-of-way; describing PPL Electric's policy regarding land owner's use of the right-of-way area; providing examples of situations in which PPL Electric worked with land owners; and detailing the status of PPL Electric's attempts to acquire the necessary rights-of-way and easements for the North Lancaster-Honey Brook Project.

In accordance with Section 57.74 of the Commission's regulations, 52 Pa. § 57.74, PPL Electric previously filed and served copies of these statements on all parties that received the Siting Application.

21. Consistent with the Commission's Policy Statement at 52 Pa. Code § 69.3103, PPL Electric also filed and served the following direct testimony in support of the Eminent Domain Applications:

<u>Witness</u>	<u>Statement Nos.</u>	<u>Topics</u>
JoMarie Jenkins	PPL Electric St. No. J. Roys-1	Describing the property of J. Roys Inc., c/o Mr. Grant Wise in Brecknock Township, Lancaster County, Pennsylvania; and describing PPL Electric's proposed right-of-way easement over said property.
JoMarie Jenkins	PPL Electric St. No. Bias-1	Describing the property of Paul D. Bias and Michelle Bias in Brecknock Township, Lancaster County, Pennsylvania, and describing PPL Electric's proposed right-of-way easement over said property.
JoMarie Jenkins	PPL Electric St. No. Eberly-1	Describing the property of Merle Z. Eberly and Sharon Eberly in Brecknock Township, Lancaster County, Pennsylvania; and describe PPL Electric's proposed right-of-way easement over said property.

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

V. DISCOVERY

23. 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

24. 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:

Other Parties' Testimony	December 1, 2014
Rebuttal Testimony	January 12, 2015
Surrebuttal Testimony	January 20, 2015
Evidentiary Hearings	February 2-5, 2015
Initial Briefs	March 16, 2015

Reply Briefs

March 30, 2015

Recommended Decision

April 30, 2015 (estimated)

25. PPL Electric notes that the litigation schedule outlined above is substantially similar to the schedule set forth in the ALJ's Prehearing Order No. 1.

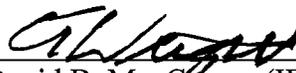
26. As explained in PPL Electric's Siting Application and Direct Testimony, PPL Electric undertook extensive public outreach efforts during the siting stage of the North Lancaster-Honey Brook Project and has incorporate the results of those efforts into the siting and design of the proposed North Lancaster-Honey Brook #1 138/69 kV Transmission Line to the greatest extent practical. Given these public outreach efforts, PPL Electric does not believe that there is sufficient public interest to warrant a public input hearing.

VII. SETTLEMENT

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

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

Respectfully submitted,



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Of Counsel:

Post & Schell, P.C.

Dated: September 12, 2014

Attorneys for PPL Electric Utilities Corporation