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File #: 140066

October 24, 2014

**VIA HAND DELIVERY**

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: Petition of PPL Electric Utilities Corporation for a Finding that a Gas Insulated Substation Building and two Buildings to Shelter Control Equipment at the Laushtown 500-230-138/69 kV Substation in Brecknock Township, Lancaster County, Pennsylvania are Reasonably Necessary for the Convenience or Welfare of the Public - Docket No. P-2014-**

Dear Secretary Chiavetta:

Enclosed for filing are the original and three (3) copies of the Petition of PPL Electric Utilities Corporation for the above-referenced proceeding. Also enclosed is a CD containing copies of the Petition. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Christopher T. Wright

CTW/jl

Enclosures

cc: Certificate of Service  
Robert F. Young  
Paul T. Diskin  
Nicholas Okoro  
Kimberly Hafner

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PA PUC  
SECRETARY'S BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :  
Corporation for a Finding that a Gas :  
Insulated Substation Building and two :  
Buildings to Shelter Control Equipment at : Docket No. P-2014-\_\_\_\_\_  
the Lauschtown 500-230-138/69 kV :  
Substation in Brecknock Township, :  
Lancaster County, Pennsylvania are :  
Reasonably Necessary for the Convenience :  
or Welfare of the Public :

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SECRETARY'S BUREAU

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**PETITION OF PPL ELECTRIC UTILITIES CORPORATION**

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TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric”) hereby petitions the Pennsylvania Public Utility Commission (“Commission”), pursuant to 52 Pa. Code § 5.41 and 53 P.S. § 10619, for a finding that a Gas Insulated Substation (“GIS”) building and two buildings to shelter control equipment (“Control Equipment Buildings” or “CEBs”) at the proposed Lauschtown 500-230-138/69 kV Substation (“Lauschtown Substation”) in Brecknock Township, Lancaster County, Pennsylvania are reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance (“Zoning Petition”).<sup>1</sup> Subject to the Commission’s approval, construction of this Project is scheduled to begin in the second quarter

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<sup>1</sup> PPL Electric believes its GIS building and CEBs are not “buildings” but, rather, are part of the substation facilities. Therefore, PPL Electric’s GIS building and CEBs are exempt from local zoning requirements. *See, e.g., Duquesne Light Co. v. Upper St. Clair Township*, 377 Pa. 323, 334-35, 105 A.2d 287, 292 (1954). This Zoning Petition is being filed as a precaution in the event that the Commission determined that the GIS building or CEBs are not facilities and, therefore, potentially subject to local zoning ordinances.

of 2015 to support the in-service date of May 2017. In support of this Zoning Petition, PPL Electric states as follows:

**I. INTRODUCTION AND OVERVIEW**

1. This Zoning Petition 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

3. PPL Electric’s attorneys are:

Paul E. Russell (Bar I.D. # 21643)  
Associate General Counsel  
PPL Services Corporation  
Two North Ninth Street  
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PPL Electric’s attorneys are authorized to receive all notices and communications regarding this Zoning Petition.

4. 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. PPL Electric furnishes electric distribution, transmission, and provider of last resort electric supply services 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.

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. The proposed new Lauschtown Substation is needed to resolve multiple North American Electric Reliability Corporation (“NERC”) and PJM Interconnection, LLC (“PJM”) reliability violations, and to reinforce the 230 kV systems in Lancaster, Berks, and Chester Counties. The new Lauschtown 500-230-138/69 kV Substation will provide a new 500 kV backbone source to the area and will alleviate the overload conditions on the 230 kV system.

7. The proposed Lauschtown Substation will be interconnected with the existing Hosensack – Three Mile Island 500 kV Transmission Line. This part of the Lauschtown Project will be completed by Metropolitan Edison Company (“Met-Ed”), a FirstEnergy Company, and will involve the construction of two single-circuit 500 kV transmission lines that will extend approximately 0.2 miles from the 500 kV GIS at the proposed Lauschtown 500-230-138/69 kV Substation to the existing Hosensack – Three Mile Island 500 kV Transmission Line. Met-Ed will seek Commission approval to site and construct the 500 kV transmission line work under a separate filing. The 500 kV portion of the project will be explained in greater detail in the Met-Ed separate filing.

8. The proposed new Lauschtown Substation will be connected with two existing 230 kV lines: the South Akron – Berks 230 kV Transmission Line and the South Akron – South Reading 230 kV Transmission Line. This part of the Project will be completed by PPL Electric

and will involve the construction of four new single-circuit 230 kV transmission lines (two for each interconnected circuit) that will total approximately 0.75 miles.

9. Contemporaneously herewith, PPL Electric is filing the “Letter of Notification of PPL Electric Utilities Corporation, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to Site and Construct Approximately 0.75 miles of new 230 kV Transmission Line to Interconnect the Lauschtown 500-230-138/69 kV Substation in Brecknock Township, Lancaster County, Pennsylvania with the 230 kV System” (“Lauschtown Letter of Notification”). Therein, PPL Electric is requesting approval to site and construct the 230 kV transmission lines associated with the Lauschtown Substation.

10. With the Lauschtown Letter of Notification, PPL Electric is filing four Attachments, which provide additional detailed information regarding the Lauschtown Project.

11. A complete copy of the Lauschtown Letter of Notification has been served on all the same persons that are being served with this Zoning Petition. The Lauschtown Letter of Notification and supporting Attachments are incorporated herein by reference.

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

12. The Portland (Unit 1 & 2), Shawville (Unit 1, 2, 3 &4), Titus (Unit 1, 2 & 3), and Glen Gardner (CT 1-8) generating facilities are scheduled to be deactivated in 2015.

13. Studies conducted for PPL Electric’s transmission system, in conjunction with the PJM Regional Transmission Expansion Plan (“RTEP”) process, revealed several transmission line thermal overload and voltage violations to the 230 kV system serving the Lancaster area by summer 2015 after these generating facilities are retired. Detailed descriptions of the PJM RTEP process and PPL Electric’s system planning process are provided in Attachment 1 to this Letter of Notification.

14. Specifically, the 2013 RTEP identified the following violations of the NERC and PJM reliability standards on PPL Electric's 230 kV electric system in Lancaster, Berks, and Chester Counties after the declared generator deactivations:

By the summer of 2015, an outage of the South Akron – Millwood 230 kV Transmission Line followed by the outage of the South Lebanon – Berks 230 kV Transmission Line would cause the following overloads: the Brunner Island – South Manheim 230 kV Transmission Line would exceed its summer emergency rating by 6% and the South Akron – South Manheim 230 kV Transmission Line would exceed its summer emergency rating by 9%.

By the summer of 2015, an outage of the South Manheim – Brunner Island 230 kV Transmission Line followed by an outage of the South Lebanon - Berks 230 kV Transmission Line would overload the Millwood – South Akron 230 kV Transmission Line, causing it to exceed its summer emergency rating by 20%.

By the summer of 2015, an outage of the South Akron - Millwood 230 kV Transmission Line followed by subsequent outage of the Brunner Island – South Manheim 230 kV Transmission Line would cause a voltage drop of 8% on the 230 kV bus at the South Akron 230-138-69 kV Substation. This voltage drop would exceed the maximum allowable voltage deviation threshold of 5% for buses that remain networked post contingency as set forth in both the PJM Planning Criteria and PPL Electric's system reliability criteria.

15. The electric reliability violations identified on the 230 kV system supplying Lancaster, Berks, and Chester Counties are the result of transmission line thermal overload and voltage violations. Overloading transmission lines may cause sustained damage to transmission infrastructure and catastrophic long duration power outages. Voltage drop violations will affect the voltage and power quality provided to customers served from the affected transmission lines.

16. Detailed descriptions of the NERC and PJM reliability violations identified in the 2013 RTEP are provided in Attachment 1 to the Lauschtown Letter of Notification.

### **III. THE PROPOSED PROJECT**

17. To resolve the NERC and PJM reliability violations, PPL Electric proposes to construct the new Lauschtown Substation in Brecknock Township, Lancaster County, Pennsylvania, east of Reading Route (State Route 625). The Lauschtown Substation is required to resolve the NERC and PJM reliability violations.

18. The proposed Lauschtown Substation is located at the intersection of an existing 500 kV transmission line, which will supply the Substation, and two existing 230 kV transmission lines, which will be interconnected with and supplied by the Substation. The site for the Lauschtown Substation is ideal for a substation given the proximity to the existing 500 kV and 230 kV transmission lines, as well as the fact that the property is largely undeveloped, *cleared of trees, not bordered by dense residential development, and easily accessible from State Route 625.*

19. The new 500 kV GIS at the Lauschtown Substation will be connected to the existing 500 kV transmission system by a two new 0.2 mile 500 kV transmission lines that will be constructed by Met-Ed. PPL Electric proposes to construct four new 230 kV transmission lines to connect the new 230 kV switchyard at the Lauschtown Substation to the existing local 230 kV transmission systems. The total length of the four new 230 kV transmission lines to be constructed is approximately 0.75 miles. Without this transmission work, the new Lauschtown Substation cannot be placed in service.

20. The total estimated cost to site, design, and construct the proposed Lauschtown Substation and the 230 kV connecting lines is approximately \$82.7 million, which includes

approximately \$79.5 million for the substation work and \$3.2 million for the 230 kV transmission line work.<sup>2</sup>

21. Figure 3-1 in Attachment 3 to the Lauschtown Letter of Notification provides an aerial map of the proposed facilities.

22. A further explanation and description of the proposed Lauschtown Project is provided in the Attachments accompanying the Lauschtown Letter of Notification.

23. The new Lauschtown Substation will include two CEBs and a 500 kV GIS building. The Lauschtown Substation must include certain switches, relays, and other control equipment to control the flow of electricity into, within, and from the substation. In order to function properly, much of this equipment must be protected from the elements. The purpose of the CEBs and GIS enclosure is to protect the control equipment at the proposed Lauschtown Substation from the elements so that the control equipment, and the entire substation, can function properly.

24. The CEBs are expected to be approximately 60 feet by 50 feet, and the GIS building is expected to be approximately 180 feet by 46 feet.

25. The CEBs and GIS building will be steel framed metal enclosures constructed on concrete slab foundation. The exterior walls will be constructed of corrugated aluminum. There will be minimal space heating and cooling equipment for these enclosures. Such equipment will be installed solely for the purpose of keeping the temperature inside the enclosures within the

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<sup>2</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.

limits required for the control equipment to operate properly. The CEBs and GIS building will not be intended for human occupancy; there will be no supply of water and no sanitary facilities.

26. The property on which the Lauschtown Substation will be located is approximately 51.5 acres.

27. Access to the Substation, including the CEBs and GIS building, must be limited because the high voltages at which the Substation will operate present hazards to untrained persons. The Lauschtown Substation will be surrounded by a fence that will be 12-feet in height and will prevent entry by unauthorized persons. The fenced area for the Lauschtown Substation will be approximately 9.6 acres. The CEBs and GIS building will be contained within the fenced perimeter of the Lauschtown Substation.

28. As explained above, the new Lauschtown Substation will be located at the intersection of an existing 500 kV transmission line, which will supply the Substation, and two existing 230 kV transmission lines, which will be interconnected with and supplied by the Substation. The location of the Lauschtown Substation will minimize the length of transmission lines needed to connect the Lauschtown Substation to the electric grid, as well as minimize the costs and environmental impacts of connecting the associated lines to the Lauschtown Substation.

29. Provided as “**Appendix A**” hereto is an exhibit showing the location of the tract of land on which the proposed Lauschtown Substation, together with the CEBs and GIS enclosure, will be constructed.

#### **IV. EXEMPTION FROM LOCAL ZONING**

30. The Pennsylvania Municipalities Planning Code (“MPC”) provides, in relevant part, as follows:

This article shall not apply to any existing or proposed building, or extension thereof, used or to be used by a public utility corporation, if, upon petition of the corporation, the Pennsylvania Public Utility Commission shall, after public hearing, decide that the present or proposed situation of the building in question is reasonably necessary for the convenience or welfare of the public.

Section 619 of the MPC, Act of July 31, 1968, P.L. 805, *as amended*, 53 P.S. § 10619.

31. This Pennsylvania Supreme Court has explained that the “exemption [in Section 619 of the MPC] merely grants an express power (not contained at all in the section granting general zoning power) to zone with respect to buildings of a public utility company, subject to a determination by the commission that the present or proposed location of such buildings is not reasonably necessary for the convenience of [or] welfare of the public..” *Duquesne Light Co. v. Upper St. Clair Township*, 377 Pa. 323, 334-35, 105 A.2d 287, 292 (1954). However, as explained by the Commonwealth Court, “*Duquesne Light* establishes as an enduring principle that there is no power possessed by municipalities to zone with respect to utility structures other than buildings. *South Coventry Township v. Philadelphia Electric Co.*, 504 A.2d 368, 371 (Pa. Cmwlth. 1986).

32. Thus, although a municipality may not zone public utility facilities, it may zone a public utility building unless the Commission determines that the building is reasonably necessary for the convenience or welfare of the public. If the Commission finds that the building is reasonably necessary, the building is exempt from local zoning ordinances under the MPC. *Del-AWARE Unlimited, Inc. v. Pa. P.U.C.*, 513 A.2d 593, 596 (Pa. Cmwlth. 1986).

33. As explained above, and more fully in the Lauschtown Letter of Notification and supporting Attachments, the Lauschtown Project, including the Lauschtown Substation, is necessary to resolve multiple NERC and PJM reliability violations, and to reinforce the 230 kV systems in Lancaster, Berks, and Chester Counties. The new Lauschtown Substation will

provide a new 500 kV backbone source to the area and will alleviate the overload conditions on the 230 kV system.

34. As explained above, the Lauschtown Substation must include certain equipment in order to operate properly, and said equipment must be protected from the elements. The most efficient and appropriate means of protecting the equipment at this Substation is construction of two CEBs and a GIS building on the site proposed for the new Lauschtown Substation.

35. Because the Lauschtown Project, including the Lauschtown Substation, is reasonably necessary for the public convenience and welfare, the Commission should find that the CEBs and GIS building are reasonably necessary and, therefore, exempt from the Brecknock Township's local zoning ordinance pursuant to Section 619 of the MPC. *Del-AWARE Unlimited, Inc. v. Pa. P.U.C.*, 513 A.2d 593 (Pa. Cmwlth. 1986).

## V. THE BRECKNOCK TOWNSHIP ZONING ORDINANCE

36. On January 11, 2001, the Commission adopted a policy statement to further the Commonwealth's goal of making agency actions consistent with sound land use planning by considering the impact of its decision upon local comprehensive plans and zoning ordinances. *See* 31 Pa.B. 951 (Feb. 17, 2001). Section 69.1101 of the Commission's Regulations provides:

[T]he Commission will consider the impact of its decisions upon local comprehensive plans and zoning ordinances. This will include reviewing applications for:

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(2) Siting electric transmission lines.

(3) Siting a public utility "building" under section 619 of the Municipalities Planning Code (53 P.S. § 10619)....

52 Pa. Code § 69.1101.

37. Brecknock Township has adopted a single code ordinance that contains the Township's zoning ordinance (hereinafter, "Brecknock Code"). *See* CODE OF THE TOWNSHIP OF BRECKNOCK, *as amended* (December 16, 2013).<sup>3</sup>

38. The substation site for the Lauschtown Substation is zoned as LI, Light Industrial. Public utility structures and public utility buildings are permitted uses in Light Industrial zoning districts. *See* Brecknock Code § 110-25(B)(1)(e). Structures are defined broadly to include anything constructed or erected on the ground or attached to the ground. *See* Brecknock Code § 110-7. A utility building is defined as any unattached accessory building primarily used for the storage of equipment necessary for the maintenance of the lot and all structures on the lot. *See id.*

39. Although the erection, construction, and maintenance of public utility structures and public utility buildings are permitted uses in Light Industrial zoning districts, the Brecknock Code requires a public utility to submit a plan to the Brecknock Zoning Officer for all proposed structures, buildings, and other installations. *See* Brecknock Code § 110-47(A)(1). Further the Brecknock Code requires all public utility structures and public utility buildings to have setbacks from all property lines. *See* Brecknock Code § 110-47(A)(2).

40. Under the Brecknock Code, a zoning permit must be obtained prior to the erection, construction, or use of any building, structure, or portion thereof. A zoning permit is also required prior to the use or change in land. *See* Brecknock Code § 110-91(A). In order to obtain a zoning permit, a zoning application, together with the required fee, must be submitted to

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<sup>3</sup> The Brecknock Code, *as amended*, is voluminous and, therefore, is not being reproduced with this Zoning Petition. The entire Brecknock Code is publicly available at: <http://brecknocktownship.us/code-of-ordinance/> (last visited September 19, 2014).

the Brecknock Zoning Officer. *See* Brecknock Code § 110-91(B). In addition, PPL Electric would be required to obtain a certificate of use and occupancy permit before it could begin use of the Lauschtown Substation, CEBs, GIS building, and associated transmission lines. *See* Brecknock Code § 110-93.

41. As a preliminary matter, PPL Electric notes that the Brecknock Code appears to apply to not only the CEBs and GIS building, but also to the Lauschtown Substation and the associated transmission line facilities. The substation facilities and transmission line facilities are public utility facilities that are exempt from local regulation.<sup>4</sup> Under Section 619 of the MPC, a municipality may only zone a public utility building. If, however, the Commission finds that the public utility building is reasonably necessary, the building is exempt from local zoning ordinances under the MPC. *Del-AWARE Unlimited, Inc. v. Pa. P.U.C.*, 513 A.2d 593, 596 (Pa. Cmwlth. 1986). Therefore, as a matter of well-established law, the Lauschtown Substation and

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<sup>4</sup> The lack of authority for a local municipality to regulate the design, location, or construction of public utility facilities is consistent with the long line of cases holding that public utilities are exempt from local ordinances. *See Duquesne Light Company v. Monroeville Borough*, 449 Pa. 573, 580, 298 A.2d 252, 256 (1972) (“This Court has consistently held, however, that the Public Utility Commission has exclusive regulatory jurisdiction over the implementation of public utility facilities”) (citations omitted). *See, e.g., County of Chester v. Philadelphia Elec. Co.*, 420 Pa. 422, 218 A.2d 331 (1966) (holding that regulation by a multitude of jurisdictions would result in “twisted and knotted” public utilities with consequent harm to the general welfare); *Newtown Twp. v. Philadelphia Elec. Co.*, 594 A.2d 834, 837 (Pa. Cmwlth. 1991) (noting that “it is clear that no ‘implied’ power exists in the MPC which would allow the Township to regulate [the Philadelphia Electric Company] through its subdivision and land development ordinance”); *Heintzel v. Zoning Hearing Bd. of Millcreek Twp.*, 533 A.2d 832 (Pa. Cmwlth. 1987) (holding that township had no power to regulate, under its zoning ordinance, city’s erection of water tower because that power was under the exclusive jurisdiction of the PUC); *South Coventry Twp. v. Philadelphia Elec. Co.*, 504 A.2d 368 (Pa. Cmwlth. 1986) (noting that to possibly subject [the Philadelphia Electric Company] to a miscellaneous collection of regulations upon its system would clearly burden and indeed disable it from successfully functioning as a utility); *Commonwealth v. Delaware and Hudson Railway Co.*, 339 A.2d 155 (Pa. Cmwlth. 1975) (holding that the MPC did not authorize local governments to regulate public utilities in any manner which infringes upon the power of the Commission to so regulate).

the associated transmission line facilities are exempt from the zoning requirements of the Brecknock Code.

42. Although there is not a complete ban in Light Industrial zoning districts, the Brecknock Code appears to provide certain conditions and restrictions that must be met for PPL Electric to commence work on and begin use of the Lauschtown Substation, CEBs, GIS building, and the transmission line facilities. Further, PPL Electric would be required to obtain a zoning permit and certificate of use for the Lauschtown Substation, CEBs, GIS building, and the transmission line facilities. In order to obtain such approvals, PPL Electric must follow the permitting procedures set forth in the Brecknock Code, including the payment of fees.

43. PPL Electric herein requests that the Commission find that the proposed new Lauschtown Substation is reasonably necessary for the convenience or welfare of the public and is, therefore, exempt from the requirements of the Brecknock Code that may, in the Township's opinion, impose any restriction, condition, or regulation on the construction of the CEBs and GIS building at the Lauschtown Substation.

44. PPL Electric has provided information to representatives of Brecknock Township and Lancaster County describing the Lauschtown Substation Project. These entities have not objected to the Project. Further, as indicated in the attached certificate of service, PPL Electric is serving a copy of this Zoning Petition on the Brecknock Township, Lancaster County, and their respective planning commissions.

45. In addition, in all of its interactions with Brecknock Township, Lancaster County, and their respective planning commissions, PPL Electric will continue to apply its long-standing policy of cooperating with local governments.

## **VI. RELATED PROCEEDINGS**

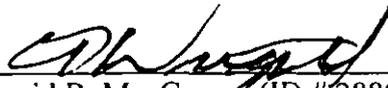
46. Contemporaneously with the filing of this Zoning Petition, PPL Electric is filing the Lauschtown Letter of Notification with the Commission. Therein, PPL Electric is requesting approval to site and construct the Lauschtown Project, including the proposed Lauschtown Substation and associated CEBs and GIS building that are the subject of this Zoning Petition. Issues relating to the necessity for Lauschtown Project are interrelated with this Zoning Petition.

47. Pursuant to 52 Pa. Code § 57.75(i)(1), PPL Electric requests that these related proceedings be consolidated for purposes of hearings, if necessary, and decision.

## **VII. CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Lauschtown Zoning Petition with the Lauschtown Letter of Notification contemporaneously filed herewith; and (2) find that the Gas Insulated Substation building and two buildings to shelter control equipment at the Lauschtown 500-230-138/69 kV Substation in Brecknock Township, Lancaster County, Pennsylvania are reasonably necessary for the convenience or welfare of the public and, therefore, are exempt from the zoning ordinance of the Brecknock Township.

Respectfully submitted,



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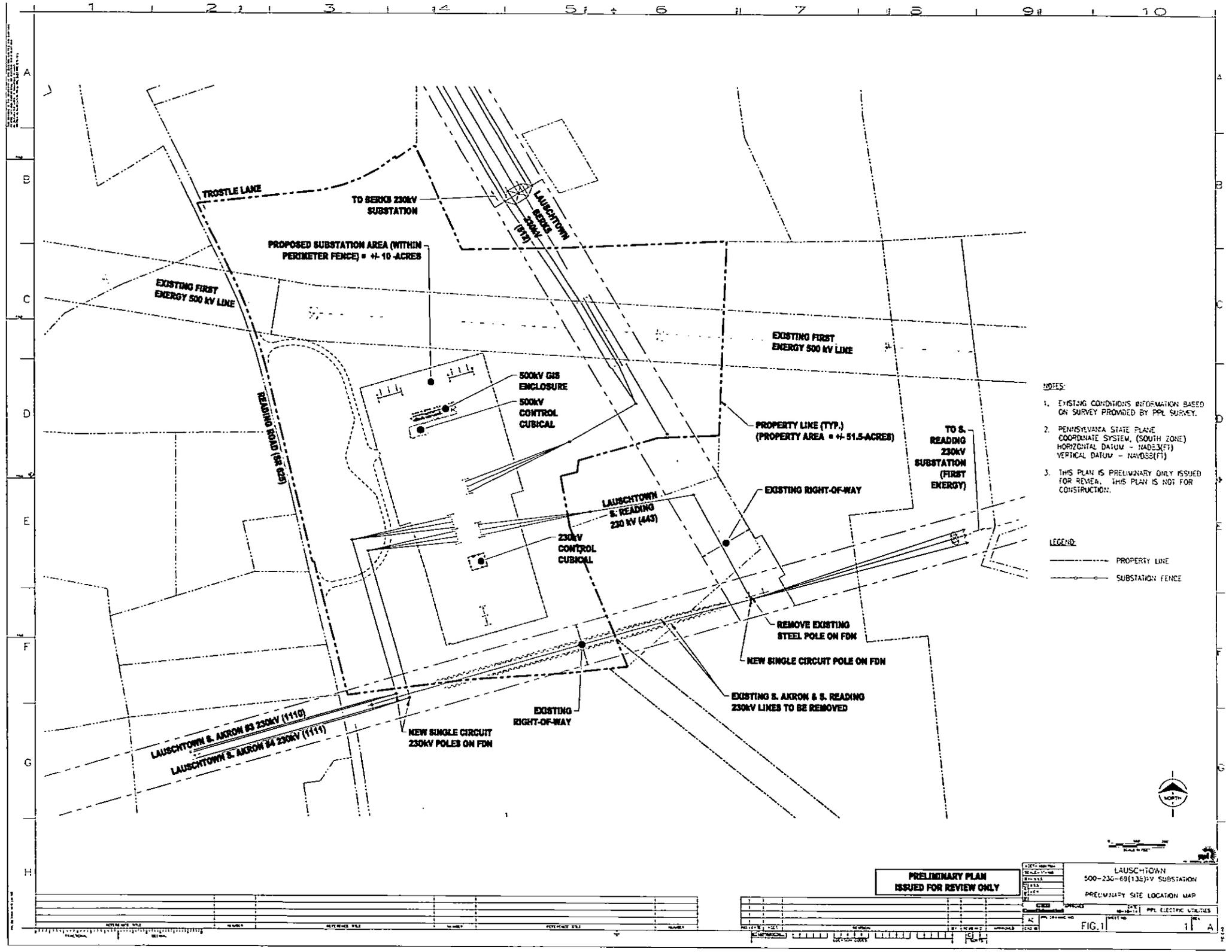
Of Counsel:

Post & Schell, P.C.

Date: October 24, 2012

Attorneys for PPL Electric Utilities Corporation

# APPENDIX A



- NOTES:**
1. EXISTING CONDITIONS INFORMATION BASED ON SURVEY PROVIDED BY PPL SURVEY.
  2. PENNSYLVANIA STATE PLANE COORDINATE SYSTEM, (SOUTH ZONE) HORIZONTAL DATUM - NAD83(FT) VERTICAL DATUM - NAVD83(FT)
  3. THIS PLAN IS PRELIMINARY ONLY ISSUED FOR REVIEW. THIS PLAN IS NOT FOR CONSTRUCTION.

- LEGEND:**
- PROPERTY LINE
  - - - - - SUBSTATION FENCE



**PRELIMINARY PLAN  
ISSUED FOR REVIEW ONLY**

PROJECT NAME		LAUSCHTOWN 500-230-69(132)V SUBSTATION	
DATE		PRELIMINARY SITE LOCATION MAP	
DRAWN BY		PPL ELECTRIC UTILITIES	
CHECKED BY		FIG. 1	
APPROVED BY		1	

DATE	BY	REVISION	DATE	BY	REVISION

### VERIFICATION

I, Stephanie Raymond, being the Vice President – Transmission and Substations at 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 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: 10/23/14

Stephanie Raymond

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **Zoning Petition** 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 CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

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. McLearen, Chief

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

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

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

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

Office of Small Business Advocate  
Commerce Building  
300 North Second Street, Suite 202  
Harrisburg, PA 17101

Lancaster County Board of Commissioners  
Lancaster County Government Center  
150 North Queen Street  
7th Floor, Suite 715  
Lancaster, PA 17603  
Attn: Dennis P. Stuckey, Chairman

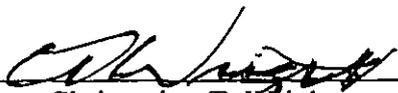
Lancaster County Planning Commission  
150 North Queen Street, Suite 320  
Lancaster, PA 17603  
Attn: Leo S. Lutz, Chairperson

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

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Date: October 24, 2014

  
Christopher T. Wright