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File #: 140066

August 13, 2015

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: Petition of PPL Electric Utilities Corporation for Waiver of Certain Provisions of the Pennsylvania Public Utility Commission's Regulations at 52 Pa. Code § 57.71 et seq., for the Siting and Reconstruction of Approximately 4.0 Miles of 230 kV Transmission Line in Archbald, Blakey and Jessup Boroughs, Lackawanna County, Pennsylvania to Interconnect a New Independent Power Producer to the Electric Grid - Docket No. P-2015-

Dear Secretary Chiavetta:

Enclosed for filing is the Waiver Petition of PPL Electric Utilities Corporation for the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Christopher T. Wright

CTW/jl
Enclosures

cc: Certificate of Service

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 CERTIFIED MAIL RETURN RECEIPT REQUESTED

Pennsylvania Historical and
Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building
400 North Street, 2nd 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, 9th 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 Small Business Advocate
Commerce Building
300 North Second Street, Suite 202
Harrisburg, PA 17101

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

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

Lackawanna County Commissioners
Lackawanna County Administration
Building
200 Adams Avenue, 6th Floor
Scranton, PA 18503

Joseph Simon, President
Archbald Borough Council
400 Church Street
Archbald, PA 18403

Karl Pfiembenberger, Chairman
Archbald Borough Planning Commission
400 Church Street
Archbald, PA 18403

Joseph J. Quinn, President
Blakey Borough Council
1439 Main Street
Peckville, PA 18452

Al Leri, Chairman
Blakey Borough Planning Commission
1439 Main Street
Peckville, PA 18452

James F. Brunozzi, President
Jessup Borough Council
395 Lane Street
Jessup, PA 18434

Gene Varzaly, Chairman
Jessup Borough Planning Commission
395 Lane Street
Jessup, PA 18434

PPL Electric Utilities Corporation
2 North Ninth Street
Allentown, PA 18101

Pine Line, Inc.
Route 6
Eynon, PA 18403

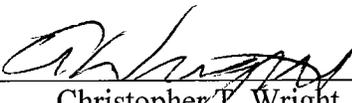
Woodbury Estates, Inc.
859 Enterprise Street
Dickson City, PA 18519

Pompey Coal Company
520 Spruce Street
Scranton, PA 18503

Davlisha Ent, Inc.
46 Public Square, Suite 600
Wilkes Barre, PA 18701

PA Northeast Regional Railroad Authority
280 Cliff Street
Scranton, PA 18503

Date: August 13, 2015



Christopher T. Wright

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Waiver of Certain :
Provisions of the Pennsylvania Public : Docket No. P-2015-_____
Utility Commission’s Regulations at 52 Pa. :
Code § 57.71 *et seq.*, for the Siting and :
Reconstruction of Approximately 4.0 Miles :
of 230 kV Transmission Line in Archbald, :
Blakey, and Jessup Boroughs, Lackawanna :
County, Pennsylvania to Interconnect a :
New Independent Power Producer to the :
Electric Grid :

PETITION FOR WAIVER

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric”) hereby files this Petition for Waiver, pursuant to 52 Pa Code §§ 5.43 and 57.72(e), seeking a waiver of certain of the Pennsylvania Public Utility Commission’s (“Commission”) regulations governing the review and approval of the siting and reconstruction of high voltage electric transmission lines set forth at 52 Pa. Code §§ 57.71 *et seq.* An independent power producer, Lackawanna Energy Center LLC (“Lackawanna Energy”), plans to construct the new Lackawanna Energy Gas-Fired Power Plant (“Power Plant”) in Jessup Borough, Lackawanna County. As described below, PPL Electric proposes to rebuild a portion of an existing 230 kV transmission line and to construct two new segments of 230 kV transmission lines necessary to interconnect the planned Power Plant with the electric grid (hereinafter, the “Project”). The Project will be located in Archbald, Blakey, and Jessup Boroughs, Lackawanna County, Pennsylvania.

Upon Commission approval, the Power Plant will be interconnected to the PPL Electric transmission system by: (i) rebuilding approximately 3.1 miles of existing 230 kV transmission line within the existing right-of-way; (ii) construction of approximately 0.4 miles of new single-circuit 230 kV transmission line on PPL Electric-owned property to interconnect the rebuilt line with the Lackawanna 500-230-69 kV Substation located in Blakely Borough; and (iii) construction of approximately 0.5 miles of new single-circuit 230 kV transmission line within new right-of-way to interconnect the rebuilt 230 kV transmission line with the Lackawanna Energy Power Plant in Jessup Borough. Although the Project does not meet the strict definition of any one of the circumstances in which a Letter of Notification may be used, it nearly fits within several of the circumstances for which a Letter of Notification may be used in lieu of a full Siting Application. For this reason and as more fully explained below, PPL Electric believes that a waiver of the siting regulations on these facts is reasonable and in the public interest.

In order to construct the proposed Project, PPL Electric will, in the near future, submit an appropriate filing with the Commission seeking approval for the siting and construction of the 230 kV transmission lines associated with the Project. Importantly, PPL Electric is not herein seeking approval to site and construct the Project. Rather, the sole purpose of this Petition for Waiver is to determine the type of filing that PPL Electric should submit to the Commission -- a Letter of Notification under 52 Pa. Code § 57.72(d) or a full Siting Application under 52 Pa. Code §§ 57.71(a)-(c) -- to seek Commission approval of the siting and reconstruction of the Project. All parties potentially affected by the Project will be served with the future filing and will have the full opportunity to participate in that future proceeding.

For the reasons explained below, PPL Electric submits that the Project is eligible for a waiver from the requirements of a full Siting Application under 52 Pa Code §§ 57.71(a)-(c), and

that it is appropriate and reasonable for the Project to be filed as a Letter of Notification under 52 Pa. Code § 57.72(d) to seek Commission approval of the siting and construction of the Project.

I. INTRODUCTION

1. This Petition for Waiver 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:

Paul E. Russell (Bar I.D. # 21643)
Associate General Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
Voice: 610.774.4254
Fax: 610.774.6726
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David B. MacGregor (Bar I.D. # 28804)
Christopher T. Wright (Bar I.D. # 203412)
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PPL Electric’s attorneys are authorized to receive all notices and communications regarding this Petition for Waiver.

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 Petition for Waiver includes the following accompanying attachments:

- Attachment 1 Aerial Map of Existing Facilities
- Attachment 2 Aerial Map of Proposed Facilities
- Attachment 3 A depiction of the type of monopoles used for the Project
- Attachment 4 List of Land Owners Within Existing and Proposed Rights-of-Way
- Attachment 5 A depiction of the existing H-frame and steel lattice structures for Segment Two of the Project

7. This Petition for Waiver and accompanying Attachments, which are incorporated herein by reference, contain all the information required by 52 Pa Code §§ 5.43 and 57.72(e).

II. PETITION FOR WAIVER

A. OVERVIEW

8. The purpose of this Petition for Waiver is to obtain from the Commission such waivers as are necessary or appropriate to permit PPL Electric to proceed by means of a Letter of Notification for the siting and reconstruction of approximately 4.0 miles of single-circuit 230 kV transmission lines in Archbald, Blakey, and Jessup Boroughs, Lackawanna County, Pennsylvania.

9. As explained below, approximately 0.4 miles of the Project will be constructed entirely on PPL Electric's existing property, approximately 3.1 miles will be rebuilt within an existing right-of-way, and approximately 0.5 miles will be constructed within new rights-of-way to be obtained by PPL Electric. PPL Electric submits that the most practical and efficient

method to obtain Commission review and approval for the siting of the Project is a Letter of Notification under 52 Pa. Code Pa. Code § 57.72(d) rather than a full Siting Application under 52 Pa Code §§ 57.71(a)-(c). The use of a Letter of Notification will provide all the information necessary for the Commission and interested parties to fully review and determine whether the Potential Project should be approved.

10. Further, the use of a Letter of Notification will permit PPL Electric to complete the filings required for approval in a much shorter period of time than would be required to prepare a complete Siting Application for the Project. Importantly, the proposed new and rebuilt 230 kV transmission lines are required to interconnect the planned new Power Plant with the electric grid. The Power Plant has an in-service date of June 1, 2017. However, the Power Plant will not be able to get its electric supply to the wholesale electric market until the Project has been completed. Regulatory review in a shorter period of time will enable PPL Electric to complete construction of the Project and maintain the construction and in-service dates without jeopardizing or otherwise delaying the construction schedule required for the planned new Power Plant.

11. The Commission's regulation at 52 Pa. Code § 57.72(d) sets forth the circumstances under which an electric public utility may seek Commission approval for the siting and construction of a proposed high voltage transmission line by means of a Letter of Notification instead of a full Application as follows:

(d) Letter of notification in lieu of Application:

(1) A Letter of Notification may be filed with the commission in lieu of the Application process set forth in §§ 57.71 – 57.76 for the following:

(i) An HV line which is proposed to be located entirely on an existing transmission line right-of-way, so long as the size, character design, or configuration of the proposed HV line does not substantially alter the right-of-way.

(ii) An HV line which is proposed to be located entirely within a public road.

(iii) An HV line which is proposed to be located entirely within the applicant's existing transmission line right-of-way and the property of the sole customer to be served by the line, so long as the size, character, design, or configuration of the proposed line does not substantially alter the right-of-way.

(iv) A line for which the voltage is proposed to be increased above its present levels, so long as the size, character, design or configuration of the proposed line does not substantially alter the right-of-way.

(v) An HV line which is to be reconductored or reconstructed so long as the size, character, design or configuration of the proposed line does not substantially alter the right-of-way.

(vi) An HV line having a proposed route of 2 miles or less.

52 Pa Code § 57.72 (d).

12. As proposed, the Project does not meet the strict definition of any one of the circumstances in which a Letter of Notification may be used, as set forth above. The Project, however, nearly fits within several of the circumstances in which a Letter of Notification may be used in lieu of a Siting Application. PPL Electric is requesting a waiver of the strict application of the aforementioned regulations to allow PPL Electric to file a Letter of Notification in lieu of a Siting Application for Commission review and approval to site and construct the Project.

13. The Commission's Rules of Administrative Practice and Procedure at 52 Pa. Code § 5.43 allow for petitions for waiver of any of the Commission's regulations. More specifically, the Commission's transmission line siting regulations at 52 Pa. Code § 57.72(e) specifically permit petitions to request that portions of these specific siting regulations be waived. It states:

(e) The Commission or the presiding officer may — upon the petition of any party, upon the Commission's own motion, or upon the presiding officer's own motion — waive one or more or all of the requirements in this subchapter. The petition shall clearly state the requirements sought to be waived and the reasons therefor.

52 Pa. Code § 57.72(e).

14. PPL Electric respectfully requests a waiver of the strict application of 52. Pa Code §57.72(d)(1) to permit PPL Electric to seek approval of the siting and construction of Project to interconnect a new independent power producer with the electric grid.

B. PURPOSE OF THE PROJECT

15. Lackawanna Energy plans to construct a new Power Plant in Jessup Borough, Lackawanna County, Pennsylvania.

16. The planned new Power Plant will interconnected as a 1,370 MW combined cycle natural gas-fired facility. The Power Plant will consist of three natural gas-fired turbines that are each coupled with one heat recovery steam generator that delivers steam to a single steam turbine generator. The gas turbine systems generate electricity by burning natural gas to generate electricity. Energy normally lost in the exhaust and cooling systems is instead captured in the heat recovery unit and converted into useful thermal energy, in the form of steam. In order to get the power produced from the Power Plant to the electric market, the Power Plant must be interconnected with the electric grid.

17. Transmission Owners, such as PPL Electric, are required by federal law to provide open access to their transmission systems. As explained below, through the PJM Interconnection LLC (“PJM”) generation interconnection process, PJM and PPL Electric determined that the proposed Project is necessary to connect Lackawanna Energy’s planned new Power Plant to the electric grid.

18. 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.

19. 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.

20. Lackawanna Energy applied for and received PJM approval to interconnect with PPL Electric’s existing 230 kV transmission line located in close proximity to the site for the planned new Power Plant. An aerial map depicting the location of the existing facilities is provided in Attachment 1 to the Petition for Waiver.

21. Through the PJM interconnection process, PJM and PPL Electric determined that the interconnection of the Power Plant with the PPL Electric’s transmission system will require construction of approximately 4.0 miles of high capacity 230 kV transmission line from the proposed Lackawanna Energy Power Plant in Jessup Borough to PPL Electric’s existing Lackawanna 500-230-69 kV Substation in Blakely Borough.

C. DESCRIPTION OF THE PROJECT

22. Under the PJM-approved Interconnection Construction Agreement, the Project will require approximately 3.1 miles of existing single-circuit 230 kV transmission line to be rebuilt with higher capacity, triple-bundle conductors to accommodate the additional load from the Power Plant. One end of the rebuilt, higher capacity conductors will be interconnected with the Lackawanna 500-230-69 kV Substation by construction of approximately 0.4 miles of new

230 kV transmission line. The other end of the rebuilt, higher capacity conductors will be interconnected with the Lackawanna Energy Power Plant by construction of approximately 0.6 miles of new single-circuit 230 kV transmission line.

23. These three segments of the proposed Project are further described below. An aerial map depicting the location of the proposed Project is provided as Attachment 2 to this Petition for Waiver.

24. The total estimated cost of the Project is approximately \$21.2 million.¹ The entire cost of the Project will be paid for Lackawanna Energy.

25. Upon Commission approval, the Project has a scheduled construction start date of Spring 2016 to support the June 1, 2017 in-service date of the Power Plant.

1. First Segment of New 230 kV Transmission Line on PPL Electric-Owned Property

26. The first segment of the Project requires the construction of approximately 0.4 miles of new single-circuit 230 kV transmission line between the Lackawanna 500-230-69 kV Substation located in Blakely Borough and the existing Lackawanna-Peckville #3 230 kV Transmission Line located in Archbald Borough.

27. This segment of new 230 kV transmission line will be located entirely on PPL Electric's property owned in fee for the existing Lackawanna 500-230-69 kV Substation and associated transmission lines interconnected with the Lackawanna 500-230-69 kV Substation. No new rights-of-way are required for this segment of the Project.

¹ 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.

28. The first segment of the Project will require four new single-circuit, weathering steel monopoles. The 230 kV steel monopoles will be approximately 124 feet in height and will be self-supported on concrete caisson foundations. A depiction of the type of monopoles used for this segment of the Project is provided in Attachment 3 to this Petition for Waiver.

29. The new 230 kV circuit for the first segment will utilize three conductors and two overhead ground wires. The power conductors will be 1590 kcmil,² 45/7 stranding ACSR³ conductors. The overhead ground wires will each be 48-count, 0.752-inch diameter fiber optical ground wires that will provide lightning protection and communication between substation breakers that remove the line from service should a fault occur.

2. Second Segment of Rebuilt 230 kV Transmission Line

30. The second segment of the Project requires the rebuild of approximately 3.1 miles of existing single-circuit 230 kV transmission line within the exiting right-of-way. Importantly, if the 3.1 miles of existing single-circuit 230 kV transmission line is not rebuilt as part of this Project, a new separate transmission line would have to be built where one does not presently exist today in order to interconnect the Power Plant with the electric grid.

31. The second segment will extend approximately 2.4 miles from the Lackawanna 500-230-69 kV Substation to the Peckville 230-69 kV Substation.⁴ The second segment will continue approximately 0.7 miles from the Peckville 230-69 kV Substation to a point just west of

² A kcmil or circular mil is the cross-sectional area of a wire one mil in diameter, where 1 kcmil = 0.5067 mm².

³ ACSR stands for aluminum conductor steel reinforced.

⁴ The 230 kV transmission line between the Lackawanna 500-230-69 kV Substation to the Peckville 230-69 kV Substation currently is referred to as the Lackawanna-Peckville #3 230 kV Transmission Line.

Breaker Street in Jessup Borough of the existing single-circuit.⁵ In total, the second segment requires the rebuild of approximately 3.1 miles of the existing single-circuit 230 kV transmission line.

32. The second segment of the Project will be rebuilt entirely within the existing right-of-way. Attachment 4 to this Petition provides a list of all current owners of land that are traversed by the right-of-way for the second segment of the Project.

33. PPL Electric's existing transmission corridor consists of fee-owned property and right-of-way that varies from 200 to 425 feet in width. The existing fee-owned property and right-of-way is sufficient to accommodate all construction activities associated with the rebuild of the second segment of the Project. No additional right-of-way is required to accommodate this segment of the Project.

34. The existing 230 kV line currently uses wooden H-frame and steel lattice structures that are approximately 80 feet in height. Depictions of the existing wooden H-frame and steel lattice structures are provided in Attachment 5 to this Petition for Waiver. There are 29 H-frame and 4 steel lattice structures within the second segment of the Project that will be replaced by 28 new single-circuit, weathering steel monopoles. The new 230 kV steel monopoles will be approximately 126 feet in height and will be self-supported on concrete caisson foundations. A depiction of the type of monopoles used for this segment of the Project is provided in Attachment 3 to this Petition for Waiver.

35. Although the new steel monopoles will increase in height as compared to the existing wooden H-frame and steel lattice structures, impacts of the new monopoles are

⁵ The 230 kV transmission line extends approximately 29 miles from the Peckville 230-69 kV Substation to the Blooming Grove 230-69 kV Substation and currently is referred to as the Blooming Grove-Peckville 230 kV Transmission Line.

anticipated to be minimal. The new steel monopoles will be located immediately adjacent to the existing structures (“pole for pole”) along the rebuilt segment. Further, no new steel monopoles will be placed on any property that currently does not have an existing structure. The replacement of the existing H-frame and steel lattice structures with new steel monopoles also will result in smaller structure footprints within the right-of-way.

36. The rebuilt 230 kV circuit for the second segment will utilize three conductors and two overhead ground wires. The power conductors will be 1590 kcmil, 45/7 stranding ACSR conductors. The overhead ground wires will each be 48-count, 0.752-inch diameter fiber optical ground wires that will provide lightning protection and communication between substation breakers that remove the line from service should a fault occur.

3. Third Segment of New Rebuilt 230 kV Transmission Line on New Right-of-Way

37. The third segment of the Project requires the construction of approximately 0.5 miles of new single-circuit 230 kV transmission line to interconnect the planned new Power Plant with the rebuilt 230 kV transmission line described above for the second segment of the Project.

38. The third segment of the Project will extend approximately 0.5 miles from the end of the rebuilt 230 kV transmission line, just west of Breaker Street in Jessup Borough, to the point of interconnection for the new Power Plant located in Jessup Borough.

39. This segment of the Project will be constructed within right-of-way to be obtained by PPL Electric. Segment three of the Project will traverse three parcels currently owned by Pompey Coal Company (“Pompey”).⁶ PPL Electric will obtain rights-of-way and easements for

⁶ PPL Electric provided a packet of information to fully notify the current landowner that PPL Electric will ultimately own and operate the second segment of the Project. The packet provides information about the proposed Project and informs the landowner of their legal rights

the construction and operation of the new 230 kV transmission line across two of the three parcels currently owned by Pompey. The third parcel will be acquired by Lackawanna Energy for construction of the Power Plant. Lackawanna Energy will convey PPL Electric the right-of-way and easement necessary for the construction and operation of the new 230 kV transmission line across the third parcel. All costs required to obtain the rights-of-way and easements across the three parcels currently owned by Pompey will be paid entirely by Lackawanna Energy.

40. The third segment of the Project will require four new single-circuit, weathering steel monopoles. The 230 kV steel monopoles will be approximately 153 feet in height and will be self-supported on concrete caisson foundations. A depiction of the type of monopoles used for this segment of the Project is provided in Attachment 3 to this Petition for Waiver.

41. The new 230 kV circuit for the third segment will utilize three conductors and two overhead ground wires. The power conductors will be 1590 kcmil, 45/7 stranding ACSR conductors. The overhead ground wires will each be 48-count, 0.752-inch diameter fiber optical ground wires that will provide lightning protection and communication between substation breakers that remove the line from service should a fault occur.

D. WAIVER

42. Letters of Notification are permitted if the proposed transmission line has “a proposed route of 2 miles or less.” 52 Pa. Code § 57.72(d)(1)(vi). Letters of Notification are also permitted if the proposed transmission line is to be “reconstructed so long as the size, character, design or configuration of the proposed [high voltage] transmission line does not substantially alter the right-of-way.” 52 Pa. Code § 57.72(d)(1)(iii).

and PPL Electric’s legal rights with regard to this Project. This information includes the two notices that are required by 52 Pa. Code § 57.91.

43. Here, as explained above, the Project would require approximately 4.0 miles of new and reconstructed 230 kV transmission line to interconnect the planned new Power Plant with the existing electric grid. Although the proposed Project is greater than the 2-mile threshold for a Letter of Notification, the individual components of the Project qualify for a Letter of Notification.

44. The first segment of the Project requires the construction of approximately 0.4 miles of new 230 kV transmission line within new right-of-way. This segment of the project, however, will be located solely on property that currently is owned by PPL Electric for the Lackawanna 500-230-69 kV Substation and its associated transmission lines. PPL Electric submits that this segment of the Project qualifies as a Letter of Notification because it is less than 2 miles and, moreover, is located entirely on PPL Electric-owned property.

45. The second segment of the Project requires reconstruction of approximately 3.1 miles of 230 kV transmission line within the existing right-of-way. The existing right-of-way is sufficient to accommodate all construction activities associated with the rebuild of the second segment of the Project. Further, the second segment of the project will not result in a substantial alteration of the existing right-of-way. Although the new steel monopoles will increase in height, the new steel monopoles will have a smaller footprint than the existing structures, the new structures will be located “pole for pole” with the existing structures, and no new structures will be placed on any property that currently does not have an existing structure. PPL Electric submits that this segment of the Project qualifies as a Letter of Notification because it involves the reconstruction of an existing transmission line and does not substantially alter the right-of-way.

46. The third segment of the Project requires the construction of approximately 0.5 miles of new 230 kV transmission line within new right-of-way. This segment will be located within new right-of-way to be acquired by PPL Electric. PPL Electric submits that this segment of the Project qualifies as a Letter of Notification because it is less than 2 miles.

47. Although the Project does not meet the strict definition of any one of the circumstances in which a Letter of Notification may be used, as set forth above, it nearly fits within several of the circumstances in which a Letter of Notification may be used in lieu of an Application. PPL Electric is requesting a waiver of the strict application of the aforementioned regulations to allow PPL Electric to file a Letter of Notification in lieu of a Siting Application for Commission review and approval to site and construct the Project.

48. In substance, the Project is very similar to a project that qualifies for a Letter of Notification under Section 57.7(d)(1) of the Commission's regulations, 52 Pa. Code § 57.72(d)(1). PPL Electric submits that the additional information provided by and the time and expense required to prepare a full Siting Application is not needed for the Commission's review of this Project. For example, a full Siting Application would require an extensive analysis and review of alternative routes. Here, however, the vast majority of the Project involves the rebuild of an existing transmission line and the only viable alternative route would be to build a new transmission line where one does not exist today, while at the same time continuing to use the existing transmission line. Stated otherwise, the time and expense needed to prepare a full Siting Application for this Project would serve no useful purpose.

49. Transmission Owners, such as PPL Electric, are required by federal law to provide open access to their transmission systems. Through the PJM interconnection process,

PJM and PPL Electric determined that the Project is necessary to interconnect the Power Plant with the PPL Electric's transmission system will require.

50. The Commission has approved similar requests granting waivers of certain regulations regarding Commission Review of Siting and Construction of Electric Transmission Lines at 52 Pa Code § 57.71 *et seq.* See, e.g., *Letter of Notification of West Penn Power Company filed pursuant to 52 Pa. Code Chapter 57 with respect to reconstruction and relocation of the Allegheny Ludlum No. 2 138 kV Transmission Line in the City of Lower Burrell, Westmoreland County, Pennsylvania*, Docket No. A-2012-2281399, 2012 Pa. PUC LEXIS 381 (March 1, 2012) (approving the construction of a 2.7-mile transmission line project under 52 Pa. Code § 57.72(d)(1)(v) and (vi) because a portion of the line transmission line is to be reconducted or reconstructed and a separate portion being relocated is less than two miles in length); *In Re: Petition of West Penn Power Company for Waiver of Certain Provisions of the Pennsylvania Utility Commission's Regulations for Commission Review of Siting and Construction of Electric Transmission Lines set forth at 52 Pa. Code § 57.71 et seq.*, Docket No. P-2010-2166223, 2010 Pa. PUC LEXIS 860 (May 20, 2010) (approving a waiver from Section 57.72(d) for the construction of a 10.3-mile 138 kV transmission line project that involved the rebuild of 9.9 miles of existing transmission line and the construction of 0.4 miles of new transmission); *Petition for Waiver of Certain Provisions of the Pennsylvania Public Utility Commission's Regulations for Commission Review of Siting and Construction of Electric Transmission Lines set forth at 52 Pa. Code § 57.71 et seq.*, Docket No. P-2008-2037618, 2008 Pa. PUC LEXIS 448 (June 27, 2008) (approving a waiver from Section 57.72(d) for the construction of a 3.9-mile 115 kV transmission line to connect a new ethanol plant to the grid); *Petition of Duquesne Light Company for Waiver of Certain Provisions of the Pennsylvania*

Public Utility Commission's Regulations at 52 Pa. Code § 57.71 et seq., for the Siting and Relocation of Existing Transmission Facilities in Brighton, Vanport, Potter, and Center Townships, Beaver County, Pennsylvania to Accommodate a Potential New Industrial Facility, Docket No. P-2014-2401906 (May 22, 2014) (approving a waiver from Section 57.72(d) for the construction of a 2.5 mile 138 kV transmission line that would involve the construction of 1.7 miles of new transmission line on the property of a new customer to be served and 0.8 miles of new transmission line within new rights-of-way).

51. For the reasons provided above, PPL Electric requests that the Commission approve this waiver of the strict application of the Commission's siting regulations and allow PPL Electric to file a Letter of Notification in lieu of a Siting Application for Commission review and approval to site and construct the Project.

E. NOTICE

52. All owners of property within both the existing and new right-of-way required for the Project are listed in Attachment 4. Copies of this Petition for Waiver will be served on the landowners listed in Attachment 4.

53. PPL Electric also requests that the Commission publish notice of this filing in the *Pennsylvania Bulletin*, and that a reasonable deadline for intervention be set as part of that notice.

54. If the Commission approves the waiver request, a Letter of Notification may be used for the Project instead of a full Siting application. Alternatively, if the Commission denies this waiver request, a Siting Application will be filed for Commission approval of the Project.

55. Upon Commission's disposition of this Petition for Waiver, PPL Electric will file the appropriate filing, *i.e.*, either a Letter of Notification or a Siting Application. All of the information necessary for the Commission to decide whether to approve the siting and

construction of the Project will be included with the applicable filing. Any parties that want to participate in the proceeding or potentially oppose the siting approval for the Project will have the full opportunity to participate in the future proceeding when it is filed.

IV. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission grant the request for a waiver described above and in the Attachments hereto, and allow PPL Electric Utilities Corporation to file a Letter of Notification in lieu of a Siting Application for Commission review and approval of the siting and reconstruction of the 230 kV transmission lines in Archbald, Blakey, and Jessup Boroughs, Lackawanna County, Pennsylvania to interconnect the new Lackawanna Energy Gas-Fired Power Plant with the electric grid as described above and in the Attachments hereto.

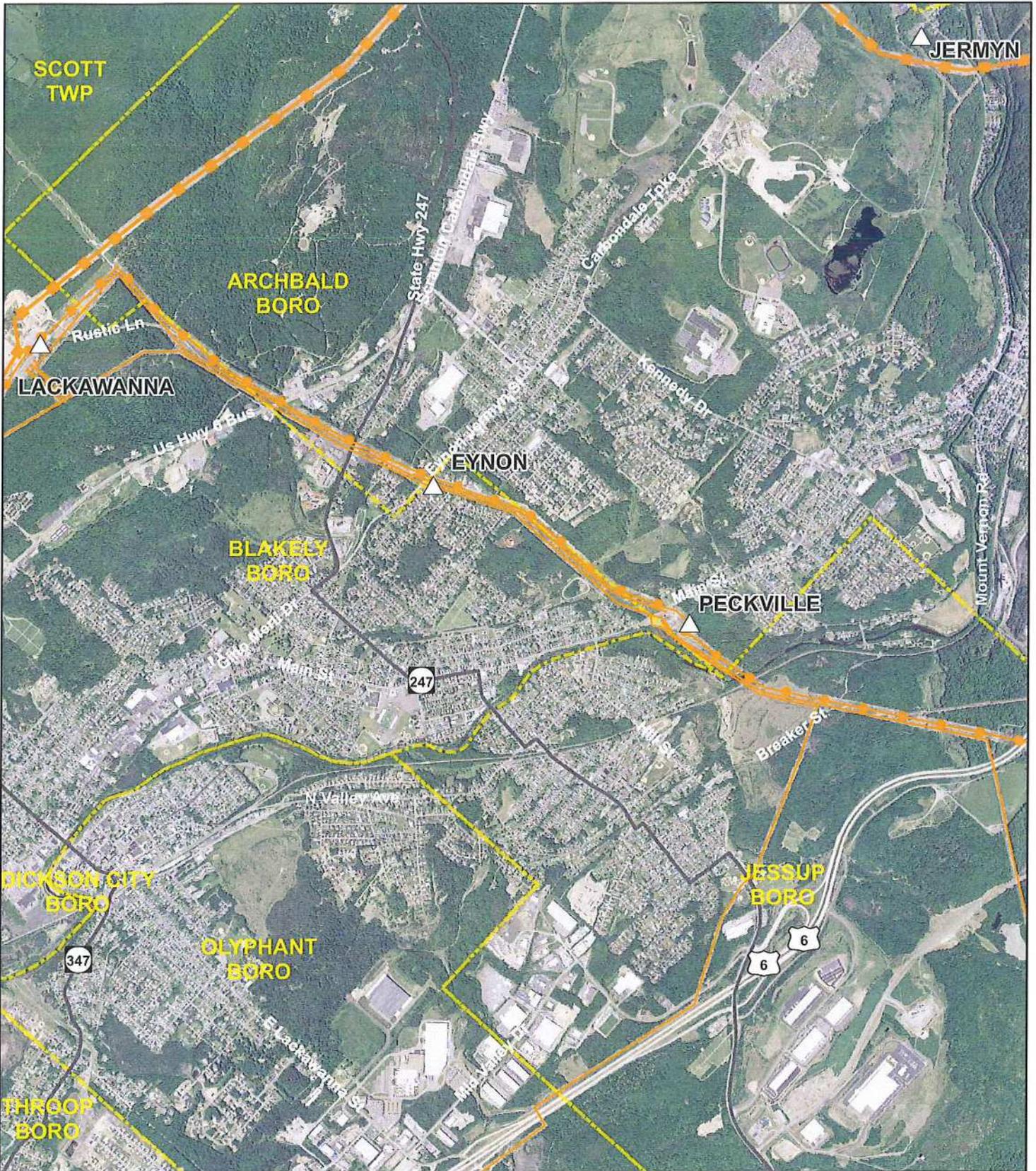
Respectfully submitted,

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Date: August 13, 2015

Attorneys for PPL Electric Utilities Corporation



Legend

- △ Substation
- Existing Transmission**
- 500kV
- 230kV
- Below 230kV
- - - Municipality Boundary

Attachment 1: Aerial Map of Existing Facilities

0 2,000 4,000 Feet

ppl **Louis Berger**

Projected Coordinate System: PA State Plane, North. Datum: North American Datum of 1983 (NAD83). Projection: Lambert Conformal Conic. Linear Unit: Feet. Ellipsoid: Geodetic Reference System 80.





Legend

- △ Substation
- Rebuild
- Route
- Existing Transmission**
- 500kV
- 230kV
- Below 230kV
- Municipality Boundary

Attachment 2: Aerial Map of Proposed Facilities



0 2,000 4,000 Feet



*Projected Coordinate System: PA State Plane, North
 Datum: North American Datum of 1983 (NAD83)
 Projection: Lambert Conformal Conic
 Linear Unit: Feet
 Ellipsoid: Geodetic Reference System 80.*



**ATTACHMENT 3
PROPOSED STEEL MONOPOLES**

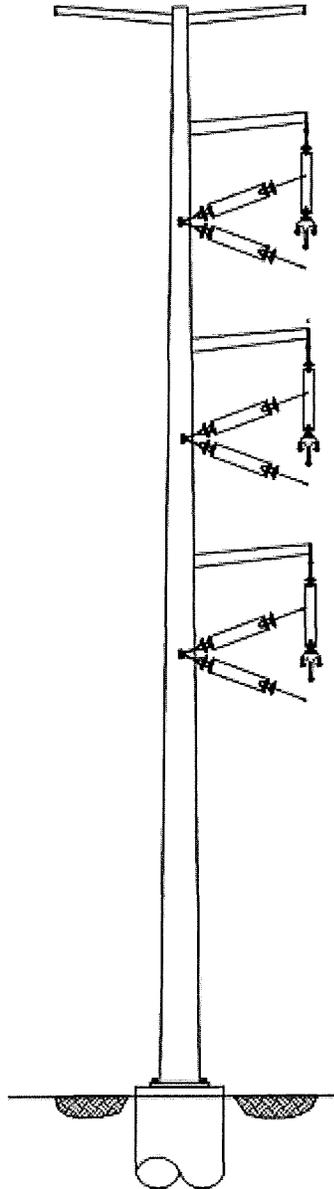


Figure 3-1. Typical Deadend Steel Monopole

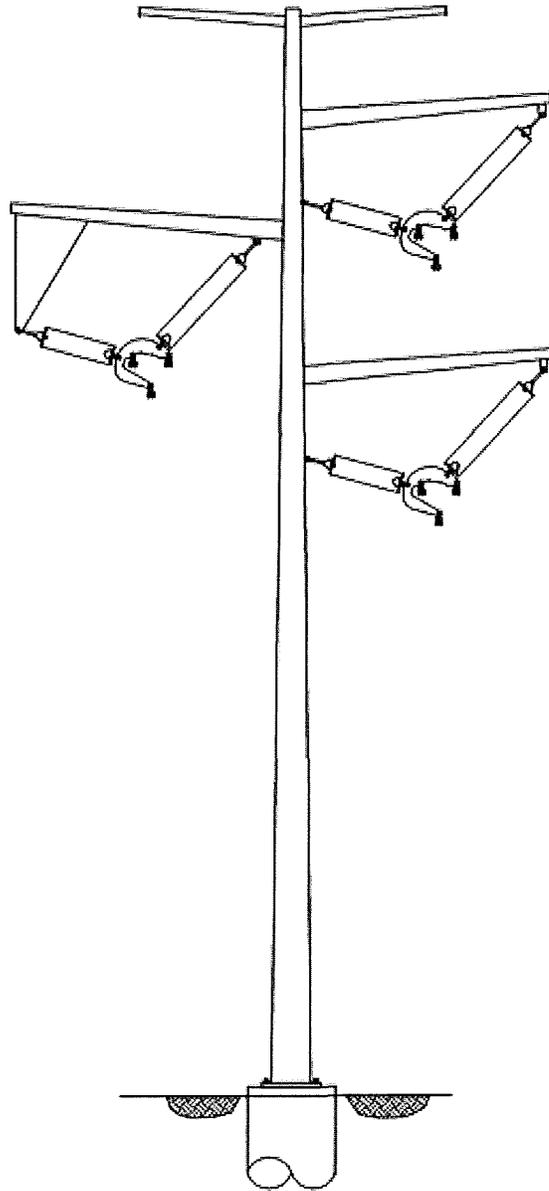


Figure 3-2. Typical Right Running Angle Steel Monopole

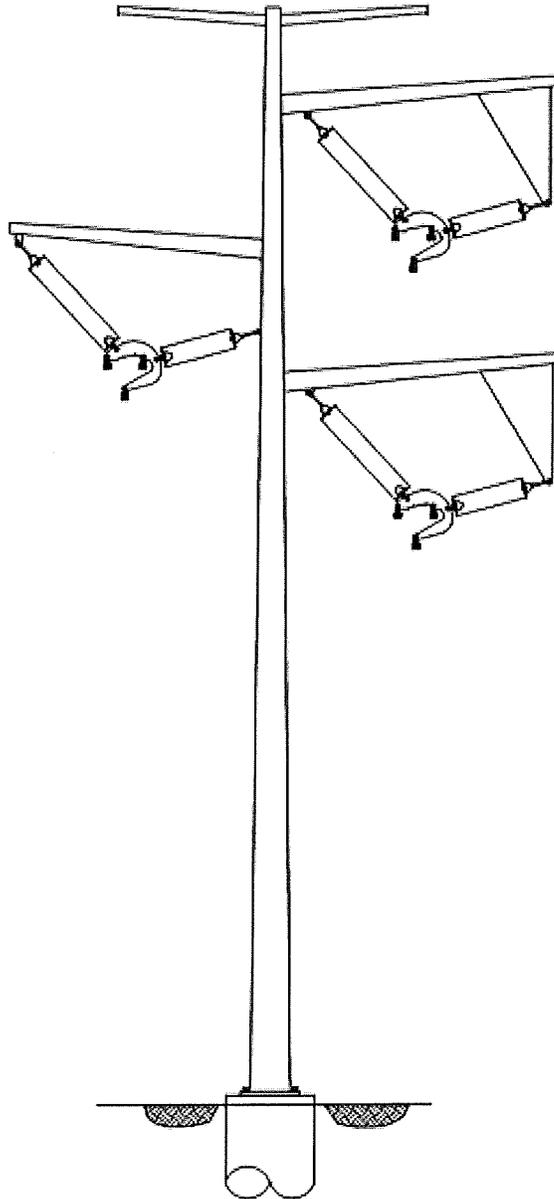


Figure 3-3. Typical Left Running Angle Steel Monopole

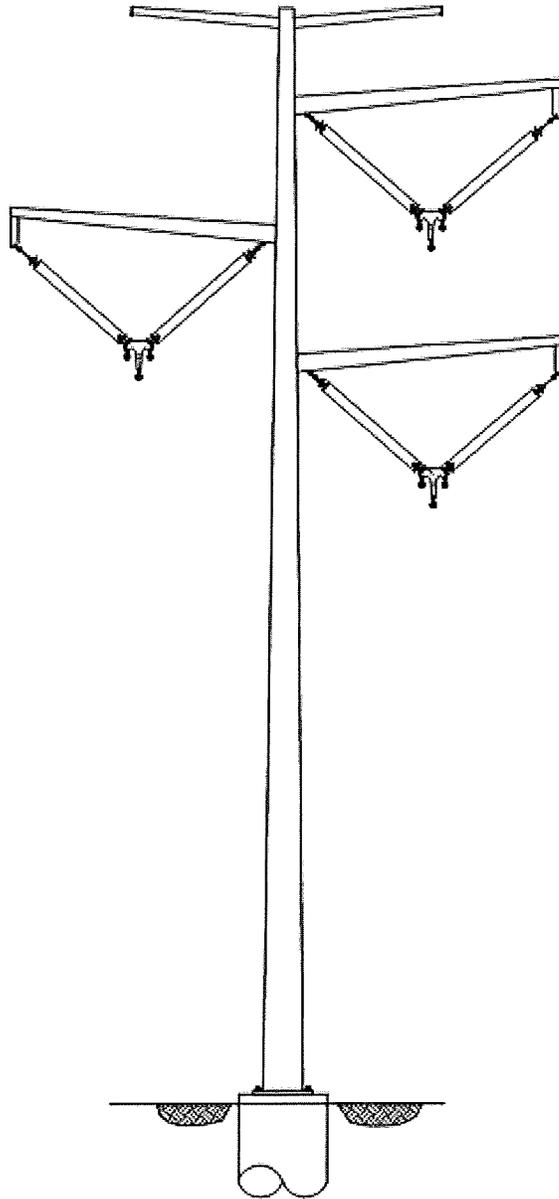


Figure 3-4. Typical Tangent Steel Monopole

ATTACHMENT 4
LIST OF LANDOWNERS WITHIN THE RIGHT-OF-WAY

1. PPL Electric Utilities Corporation
2 North Ninth Street
Allentown, PA 18101
2. Pine Line, Inc.
Route 6
Eynon, PA 18403
3. Woodbury Estates, Inc.
859 Enterprise Street
Dickson City, PA 18519
4. Pompey Coal Company
520 Spruce Street
Scranton, PA 18503
5. Davlisa Ent, Inc.
46 Public Square, Suite 600
Wilkes Barre, PA 18701
6. PA Northeast Regional Railroad Authority
280 Cliff Street
Scranton, PA 18503

ATTACHMENT 5
EXISTING H-FRAME AND STEEL LATTICE STRUCTURES

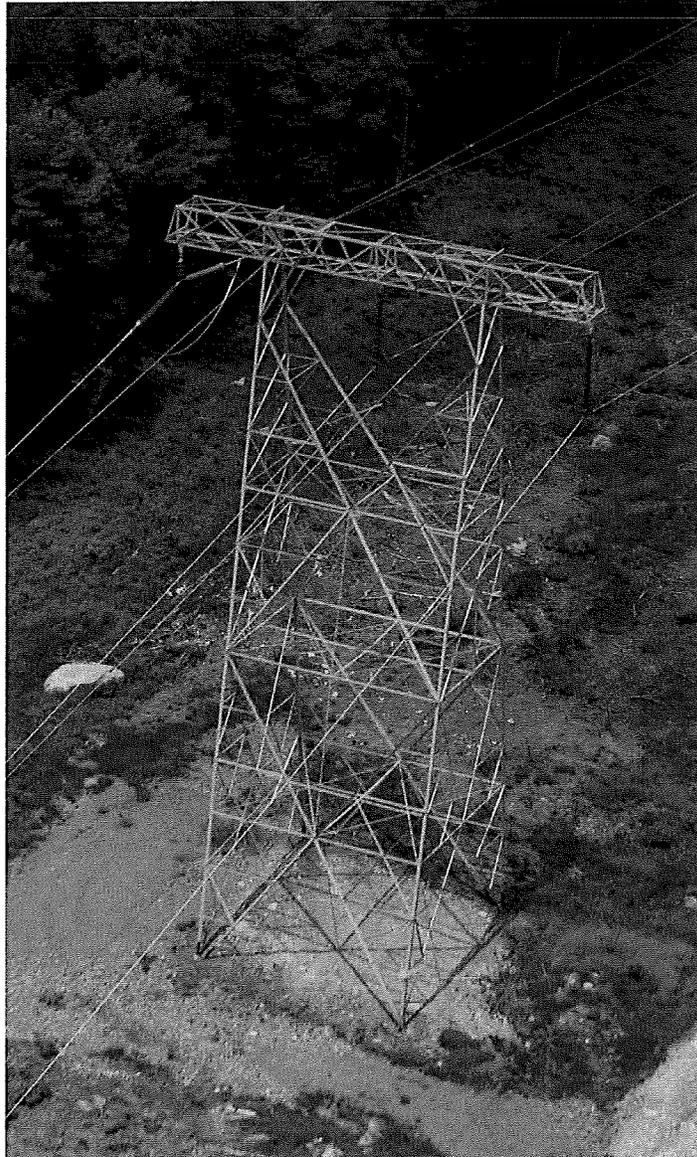


Figure 5-1. Typical Existing Steel Lattice Structure



Figure 5-2. Typical Existing Wooden H-Frame Structure

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: 8/12/15

Stephanie Raymond