

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification of PPL Electric :
Utilities Corporation, Filed Pursuant to :
52 Pa. Code Chapter 57 Subchapter G, : Docket No. A-2015-_____
for Approval to Reconstruct :
Approximately 2.6 Miles of the :
Existing Elliot Heights #1 and #2 :
138/69 kV Tap Line in the City of :
Bethlehem, Salisbury Township, :
Lehigh County, Pennsylvania. :

LETTER OF NOTIFICATION

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric”), hereby files, pursuant to 52 Pa. Code § 57.72(d), this Letter of Notification to request approval from the Pennsylvania Public Utility Commission (“Commission”) to reconstruct approximately 2.6 miles of the existing double-circuit Elliot Heights #1 and #2 138/69 kV Tap Line in the City of Bethlehem and Salisbury Township, Lehigh County, Pennsylvania (“Elliot Heights Project”). PPL Electric has provided information regarding this Project to these political subdivisions, which have not objected to the Project.

The proposed Elliot Heights Project will address and modernize deteriorated aging facilities that have exceeded their useful life and cannot be relied upon to continue to provide reliable service. The proposed reconstruction of the Elliot Heights #1 and #2 138/69 kV Tap Line will be constructed entirely within PPL Electric’s existing rights-of-way, and the required new modern structures will be placed in close proximity to the existing poles. Subject to the

Commission's approval, construction of this Project is scheduled to begin in February 2016, to support an in-service date of July 2016. In support thereof, PPL Electric states as follows:

I. INTRODUCTION

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

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

3. PPL Electric's attorneys are:

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

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

5. PPL Electric owns approximately 5,000 miles of transmission lines operating at 69 kV (kilovolts) or higher, approximately 375 substations with a capacity of 10 MVA

(megavolt amperes) or more, and approximately 43,000 miles of distribution lines operating at less than 69 kV.

6. This Letter of Notification includes the following accompanying attachments:

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

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

II. THE PROJECT

A. EXISTING SYSTEM

8. The existing Elliot Heights #1 and #2 138/69 kV Tap Line extends approximately 2.6 miles from the Elliot Heights 138-69 kV Substation located in in the City of Bethlehem, Lehigh County, Pennsylvania to the tap point with the Hosensack-Quarry #1 and #2 138/69 kV Transmission Line located in Salisbury Township, Lehigh County, Pennsylvania.

9. The Elliot Heights #1 and #2 138/69 kV Tap Line serves the Elliot Heights 138-69 kV Substation, which currently supplies approximately 7,160 customers. From the Elliot Heights 138-69 kV Substation, the Elliot Heights #1 and #2 138/69 kV Tap extends south approximately 0.4 miles to a tap point with the Fountain Hills #1 and #2 138/69 kV Tap Line, which feeds the Fountain Hill 138-69 kV Substation that serves approximately 2,099 customers. From the Fountain Hill tap point, the Elliot Heights #1 and #2 138/69 kV Tap Line continues

southwest approximately 2.2 miles where it taps into the Hosensack-Quarry #1 and #2 138/69 kV Transmission Line.

10. The Elliot Heights #1 and #2 138/69 kV Tap Line has been in service since 1960. The Tap Line is operating utilizing a mix of 4/0 copper and 4/0 aluminum-conductor steel-reinforced (ACSR) conductors. The Elliot Heights #1 and #2 138/69 kV Tap Line consists of mainly outdated wood pole, steel lattice towers and H-frame pole structures that have reached the end of their useful life and do not meet current design standards.

11. The Elliot Heights #1 and #2 138/69 kV Tap Line parallels the Hosensack-Allentown #1 and #2 69 kV Transmission Line for approximately 0.6 miles between East Susquehanna Street, Salisbury Township to the tap point with the Hosensack-Quarry #1 and #2 138/69 kV Transmission Line. This segment of the Hosensack-Allentown #1 and #2 69 kV Transmission Line is located approximately 100 to 225 feet to the east of the Elliot Heights #1 and #2 138/69 kV Tap Line. The Hosensack-Allentown #1 and #2 69 kV Transmission Line consists of guyed wood poles, and was inactivated in 2009 and no longer provides electric service to customers.¹

12. Figure 1-2 of Attachment 1 and Figure 3-1 of Attachment 3 to this Letter of Notification provide aerial maps of the existing facilities.

B. NEED FOR THE ELLIOT HEIGHTS PROJECT

13. This proposed Elliot Heights Project is needed to replace aging transmission infrastructure that has exceeded its useful life and cannot be relied upon to continue to provide reliable service into the future. The proposed reconstruction of the Elliot Heights #1 and #2 138/69 kV Tap Line involves reconstructing the line to meet all current design and lightning

¹ The Hosensack – Allentown #1 and #2 69 kV Transmission Line extends approximately 3 miles from the Allentown 138/69 kV Substation to the Hosensack-Quarry #1 and #2 138/69 kV Transmission Line.

protection standards. The modernization of the line will help ensure reasonably continuous and reliable service.

14. The proposed Project is part of PPL Electric's Asset Optimization Strategy to address and modernize deteriorated existing facilities across PPL Electric's transmission system. A significant portion of PPL Electric's system infrastructure is either approaching the end of or has exceeded its expected or useful life. The Asset Optimization Strategy was developed to systematically identify and modernize these deteriorated facilities. The criteria used to identify and prioritize the equipment and lines that qualify for this work include, but are not limited to: age, condition, operational issues, maintainability of the equipment, criticality of the equipment or line, line loading, and circuit performance. Once equipment has been identified and assessed under the above criteria, it will be put into the Capital Budget for modernization under the Asset Optimization Strategy.

15. PPL Electric has analyzed the Elliot Heights #1 and #2 138/69 kV Tap Line and concluded that the conductors and structures have reached the end of their useful lives. The assessment found deterioration of the structural components, foundations, insulators, line hardware, shield wire, grounding, signage, and an outdated structure design.

16. PPL Electric also observed issues with the splices on the Elliot Heights #1 and #2 138/69 kV Tap Line. Specifically, certain splices demonstrated significant deterioration with resistance ratios well above acceptable levels. Conductor splices that exceed the acceptable resistance ratios pose a significant risk of failure, which could result in outages to customers.

17. Based on this analysis, PPL Electric concluded that the conductors, hardware, splices, and tower structures of the existing Elliot Heights #1 and #2 138/69 kV Tap Line are nearing the end of their useful lives and should be rehabilitated or replaced.

18. The need for the Elliot Heights Project is further explained in Attachment 1 to this Letter of Notification.

C. THE PROPOSED PROJECT

19. To resolve the issues described above, PPL Electric evaluated the cost to rehabilitate the Elliot Heights #1 and #2 138/69 kV Tap Line, and concluded that the total cost to rehabilitate the line would be greater than the cost to reconstruct the Tap Line. PPL Electric therefore proposes to reconstruct the existing 2.6-mile Elliot Heights #1 and #2 138/69 kV Tap Line to meet the current design, height, and lightning protection standards. The proposed reconstruction is consistent with PPL Electric's Asset Optimization Strategy.

20. The first 2.0 miles of the Elliot Heights #1 and #2 138/69 kV Tap Line extending south from the Elliot Heights 138-69 kV Substation will be reconstructed in place within the existing right-of-way.

21. As explained in greater detail in Attachment 3, the remaining 0.6-mile segment of the Elliot Heights #1 and #2 138/69 kV Tap Line between East Susquehanna Street, Salisbury Township to the tap point with the Hosensack-Quarry #1 and #2 138/69 kV Transmission Line is in close proximity to densely populated residential areas that have been built since the Elliot Heights #1 and #2 138/69 kV Tap Line was originally installed in 1960. In an effort to reduce the impact to these residential areas, PPL Electric proposes to remove this 0.6-mile segment of the Elliot Heights #1 and #2 138/69 kV Tap Line and to reconstruct this 0.6-mile segment of the line using the parallel right-of-way for the de-energized Hosensack-Allentown #1 & #2 69 kV Transmission Line described above. This shift will reduce the impact and risks associated with the reconstructing the Tap Line near residential areas. Figure 1-3 of Attachment 1 and Figure 3-1 to Attachment 3 to this Letter of Notification provide maps of the proposed facilities.

22. The Elliot Heights #1 and #2 138/69 kV Tap Line will be reconstructed with new steel monopoles, high capacity conductors, lightning arrestors and an optical ground wire.

23. The existing transmission structures, which include a combination of wood pole, steel lattice, and H-frame pole structures, will be replaced with double-circuit, self-weathering steel monopoles equipped with steel arms and glass 138 kV insulator assemblies.

24. The new structures for the entire reconstructed Elliot Heights #1 and #2 138/69 kV Tap Line are expected to range between 90 and 115 feet in height, with an average height of approximately 105 feet. All new poles will be self-supported either direct embedded or on concrete caisson foundations.

25. There will be a total of 27 new tower structures. With the exception of one structure, all new tower structures will be located in in the same vicinity as the existing tower structures. One tower structure will need to be relocated by approximately 50 feet from the existing structure location in order to avoid wetlands. However, no new poles will be placed on any property that currently does not have an existing pole.

26. The reconstructed double-circuit Elliot Heights #1 and #2 138/69 kV Tap Line will utilize six power conductors and two overhead ground wires. The power conductors will be six 556.5 kcmil,² 24/7 stranding, ACSR³ conductors. The overhead ground wires will be two 0.567-inch diameter Optical Ground Wires.

27. The new lines will be constructed for future double-circuit 138 kV operation but will initially operate it as a double-circuit 69 kV line until the load growth in the area makes it appropriate to increase the operating voltage.

² Kcmil stands for thousand circular mills. Kcmil wire size is the equivalent cross sectional area in thousands of circular mils. A circular mil is the area of a circle with a diameter of one thousandth (.001) of an inch.

³ ACSR stands for aluminum conductor steel reinforced.

28. Following completion of the Project, the Elliot Heights #1 and #2 138/69 kV Tap Line will meet all current PPL Electric and National Electrical Safety Code standards. Further, the use of steel monopoles, increased pole heights, optical overhead ground wires, and new lightning protection will help improve the reliability of the structures and the electric service received by customers served from the Elliot Heights #1 and #2 138/69 kV Tap Line and the Fountain Hills #1 and #2 138/69 kV Tap Line.

29. The total estimated cost of the proposed Elliot Heights Project is \$5.5 million.⁴

30. Upon Commission approval, the Elliot Heights Project has a scheduled construction start date of February 2016 to meet an in-service date of July 2016.

31. The Engineering Description of the proposed Elliot Heights Project is provided in Attachment 2 accompanying this Letter of Notification.

III. HEALTH AND SAFETY

32. The proposed Elliot Heights Project will not create any unreasonable risk of danger to the public health or safety. The reconstructed Elliot Heights #1 and #2 138/69 kV Tap Line will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable NESC minimum standards and all applicable legal requirements. Descriptions of the NESC standards, PPL Electric's design criteria, and PPL Electric's safety practices are provided in Attachment 4 to this Letter of Notification.

33. The existing right-of-way varies from 50 to 100 feet in width. PPL Electric has designed the rebuild to fit within the existing right-of-way. In areas with less than 100 feet of

⁴ The estimated cost for the proposed Elliot Heights Project is an order-of-magnitude estimate developed using averages of recent costs for similar projects and without an in-depth analysis of field 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.

right-of-way, PPL Electric is using shorter arms and/or use of deadend structures to reduce blow-out and meet NESC standards.

34. Consistent with its Magnetic Field Management Program, PPL Electric will reconstruct the Elliot Heights #1 and #2 138/69 kV Tap Line for ground clearances that are a minimum of five feet higher than the required NESC minimum ground clearance for 138/69 kV lines in order to reduce the magnetic field exposure. Further, the reconstructed Elliot Heights #1 and #2 138/69 kV Tap Line will be constructed as a double circuit transmission lines and will utilize reverse phasing to help reduce magnetic field exposures.

35. There is one AT&T cell attachment located on the Elliot Heights #1 and #2 138/69 kV Tap Line. PPL Electric will coordinate with AT&T to relocate the cell attachment during construction. No communication towers, pipelines, or other utilities will be affected by the proposed Elliot Heights Project.

36. The closest airport is the Lehigh Valley International Airport, a Lehigh-Northampton Airport Authority-owned facility, located approximately 2.1 miles northwest of the right-of-way for the proposed Project. PPL Electric does not anticipate any interference with airport operations because the Project is located in an area where there are existing electrical facilities and because the new facilities will be a similar height as the existing facilities. Nevertheless, PPL Electric will file the appropriate notifications with the PennDOT Bureau of Aviation and the Federal Aviation Administration to confirm that the proposed new tower structures and conductors will not pose a hazard to flight operations at this airport.

IV. RIGHT-OF-WAY STATUS

37. The Elliot Heights Project will be constructed entirely within PPL Electric's existing rights-of-way for the Elliot Heights #1 and #2 138/69 kV Tap Line and the Hosensack-

Allentown #1 & #2 69 kV Transmission Line. Figure 3-1 of Attachment 3 to this Letter of Notification is an aerial map that identifies the location and properties crossed by the proposed Project.

38. The first 2.0 miles of the Elliot Heights #1 and #2 138/69 kV Tap Line extending from the Elliot Heights 138-69 kV Substation will be reconstructed in place within the existing right-of-way. As shown on Figure 3-1 of Attachment 3 to this Letter of Notification, this segment of the Elliot Heights #1 and #2 138/69 kV Tap Line is located in largely undeveloped areas. The existing right-of-way for this 2.0-mile segment of the Elliot Heights #1 and #2 138/69 kV Tap Line is 100 feet with the exception of one 225-foot-long stretch that is 50 feet wide. As explained above, PPL Electric has designed the line to fit within the existing right-of-way and meet NESC standards. No new right-of-way is required for the construction, operation, or maintenance of this 2.0-mile segment of the reconstructed Elliot Heights #1 and #2 138/69 kV Tap Line.

39. As shown on Figure 3-1 of Attachment 3 to this Letter of Notification, the remaining 0.6 miles of the existing Elliot Heights #1 and #2 138/69 kV Tap Line is located in close proximity to densely populated areas that have been developed since the time the Tap Line was originally constructed. In this area, eleven residences are located within 50 feet and twenty-two residences are located within 100 feet of the Tap Line. Further, PPL Electric only has centerline rights along this section of the Elliot Heights #1 and #2 138/69 kV Tap Line.

40. In an effort to reduce the impact to these residential areas, PPL Electric proposes to remove this 0.6 mile segment of the Elliot Heights #1 and #2 138/69 kV Tap Line and to reconstruct this segment of the line using the right-of-way for the de-energized Hosensack-Allentown #1 & #2 69 kV Transmission Line described above. This segment of the Hosensack-

Allentown #1 and #2 69 kV Transmission Line is located approximately 100 to 225 feet to the east of the Elliot Heights #1 and #2 138/69 kV Tap Line. In this area, only two residences are located within 50 feet and eight residences within 100 feet of the Hosensack-Allentown #1 and #2 69 kV Transmission Line. The existing right-of-way for the Hosensack-Allentown #1 and #2 69 kV Transmission Line varies from 50 to 100 feet in width. As explained above, PPL Electric has designed the line to fit within the existing right-of-way and meet NESC standards. No new right-of-way is required to reconstruct this 0.6 mile segment of Elliot Heights #1 and #2 138/69 kV Tap Line within the right-of-way for the de-energized Hosensack-Allentown #1 & #2 69 kV Transmission Line.

41. The existing Elliot Heights right-of-way is currently maintained in accordance with PPL Electric's Vegetation Management Program. Some additional tree clearing will be required within the existing right-of-way. The Hosensack – Allentown right-of-way has not been maintained since the line was de-energized. PPL Electric will clear vegetation within the extent of the right-of-way. In some areas, PPL Electric has additional tree clearing/ tree trimming rights and/or building restrictions in place to prevent encroachments and minimize the potential impacts of danger trees. In areas where any vegetation management is required, PPL Electric will apply its "Specifications for Initial Clearing and Control of Vegetation On or Adjacent to Electric Line Right-of-Way Through Use of Herbicides, Mechanical and Hand Clearing Techniques" to minimize any potential impacts.

V. LAND USE AND ENVIRONMENTAL EVALUATION

42. As explained above, construction of the proposed Elliot Heights Project will take place entirely within PPL Electric's existing rights-of-way for the Elliot Heights #1 and #2 138/69 kV Tap Line and the Hosensack-Allentown #1 & #2 69 kV Transmission Line. It is

anticipated that the proposed Elliot Heights Project will have minimal incremental impacts on the area.

43. Impacts to land use are anticipated to be minimal because the Elliot Heights Project will be constructed within the existing rights-of-way and no additional property will be required to complete the Project. PPL Electric will use previously established access roads for construction to further reduce interference with existing land uses.

44. The Elliot Heights Project area contains no state lands, national parks, or state parks. The existing rights-of-way for the Elliot Heights Project traverse two local parks in Salisbury Township. PPL Electric is working with Salisbury Township to address concerns about construction within the existing right-of-way through two local parks.

45. The Elliot Heights Project will traverse the Lehigh Mountain Natural Area Inventory. PPL Electric is coordinating with Salisbury Township to minimize any potential impacts to Lehigh Mountain. It is anticipated that the Project will have minimal incremental impacts on the area because the reconstruction of the Elliot Heights #1 and #2 138/69 kV Tap Line will occur within the existing rights-of-way that currently are occupied by existing transmission line facilities. The proposed Project will not affect any other unique geological, scenic, or natural areas.

46. The Elliot Heights Project will not affect any recreational areas or natural landmarks.

47. The Project area was reviewed with the Pennsylvania Historical and Museum Commission (PHMC). On July 23, 2015, PHMC submitted a response, directing PPL Electric to conduct surveys for eligible historic buildings and limited archaeological surveys at locations of ground disturbing activity near the Lehigh River. PPL Electric will continue to consult with the

PHMC to avoid impacts to cultural and archaeological resources. However, it is anticipated that the Elliot Heights Project will have minimal impacts to cultural and archeological resources because the new tower structures will be placed in close proximity to the existing tower structures.

48. The proposed Project will cross seven wetlands and seven streams, including the Lehigh River. However, it is anticipated that the Project will have minimal impacts on these streams and wetlands because the entire Project will be built within the existing ROW, and because the new tower structures will be placed in close proximity to the existing tower structures. Further, as explained in Attachment 2 to this Letter of Notification, one structure will be relocated approximately 50 feet away from the existing structure in order to avoid a wetland.

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

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

51. PPL Electric has consulted with state and federal agencies to obtain information regarding endangered and threatened species in close proximity to the Project. Based on a review of the Pennsylvania Natural Diversity Inventory records under the jurisdiction of the Pennsylvania Fish and Boat Commission, the Pennsylvania Game Commission, and the U.S. Fish and Wildlife Service (“USFWS”), these agencies have reported that the Elliot Heights Project is not anticipated to impact any threatened and endangered species or special concern species and resources located within the Project area.

52. Because Lehigh County is located within the range of the federally threatened bog turtle, PPL Electric retained a qualified bog turtle surveyor to conduct a Phase I bog turtle survey for wetlands delineated within the Project boundaries. A Phase I survey report was submitted to the USFWS and a Phase II bog turtle survey was conducted for the single potential bog turtle wetland. No bog turtles or evidence of bog turtles were observed during the Phase II survey. PPL Electric has submitted a Phase II survey report to the USFWS.

53. The Pennsylvania Department of Conservation and Natural Resources (“DCNR”) indicated that the Elliot Heights Project is located within an area that may contain water-hemp ragweed (*Amaranthus cannabinus*), a special concern species. The water-hemp ragweed grows in intertidal marshes, mudflats, and river shores, where it is subjected to daily fluctuations in water levels. No construction activity for the proposed Project will occur in water areas or other areas with fluctuating water levels. DCNR has provided a clearance letter indicated that no impacts to the water-hemp ragweed are anticipated.

VI. NOTICE

54. PPL Electric has provided information regarding the Elliot Heights Project to representatives of the City of Bethlehem, Salisbury Township, and Lehigh County. These entities have not objected to the proposed Project.

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

56. In accordance with 52 Pa. Code § 57.72(d)(3), all owners of land subject to the right-of-way and easement will be served with copies of this Letter of Notification.

VII. LETTER OF NOTIFICATION

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

58. The proposed Elliot Heights Project qualifies for use of a Letter of Notification because the reconstructed 2.6-mile Elliot Heights #1 and #2 138/69 kV Tap Line will be located entirely within PPL Electric's existing rights-of-way.

59. Further, the proposed lines will not substantially alter the existing right-of-way. As explained above, the new tower structures for the reconstructed Elliot Heights #1 and #2 138/69 kV Tap Line will be placed in close proximity to the existing poles, with the exception of one pole that must be relocated to accommodate construction activities and to avoid potential impacts to a wetland. Importantly, no new poles will be placed on any property that currently does not have an existing pole.

60. The existing tower structures, which include a combination of wood pole, steel lattice, and H-frame pole structures, will be replaced with double-circuit, self-weathering steel monopoles. The replacement of the existing lattice and H-frame pole structures with new steel monopoles will result in smaller footprints within the right-of-way.


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

VIII. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve the proposed reconstruction of the existing 2.6-mile Elliot Heights #1 and #2 138/69 kV Tap Line in the City of Bethlehem, Salisbury Township, Lehigh, Pennsylvania, that is explained above and in the Attachments hereto.

Respectfully submitted,

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Date: September 29, 2015

Attorneys for PPL Electric Utilities Corporation

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: 9/22/15

Stephanie Raymond