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File #: 166395

October 14, 2016

**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

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SECRETARY'S BUREAU

**Re: Application of PPL Electric Utilities Corporation Under 15 Pa.C.S. § 1511(c) For A Finding And Determination That The Service To Be Furnished By The Applicant Through Its Proposed Exercise Of The Power Of Eminent Domain To Acquire Right-of-Way And Easement Over A Certain Portion Of The Lands Of the Heirs of Davis Dean In West Abington, Lackawanna County, Pennsylvania Is Necessary Or Proper For The Service Accommodation, Convenience, Or Safety Of The Public Docket No. A-2016-**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation, please find the following:

- Application of PPL Electric Utilities Corporation
- Statement No. 1 (Dean) – Direct Testimony of Laura Lehmann
- Statement No. 2 (Dean) – Direct Testimony of Gary Emond
- Statement No. 3 (Dean) – Direct Testimony of Coleen Kester

A CD containing copies of the above-referenced documents is also enclosed.

Also enclosed is a check in the amount of \$350 in payment of the filing fee.

Copies will be provided as indicated on the Certificate of Service.

Rosemary Chiavetta, Secretary

October 14, 2016

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Christopher T. Wright". The signature is fluid and cursive, with the first name being the most prominent.

Christopher T. Wright

CTW/jl

Enclosures

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application Of PPL Electric Utilities :  
Corporation Under 15 Pa.C.S. §1511(c) For A :  
Finding And Determination That The Service :  
To Be Furnished By The Applicant Through :     Docket No. A-2016-\_\_\_\_\_ :  
Its Proposed Exercise Of The Power Of :  
Eminent Domain To Acquire Right-of-Way :  
And Easement Over A Certain Portion Of The :  
Lands Of the **Heirs of Davis Dean**, In West :  
Abington, Lackawanna County, Pennsylvania :  
Is Necessary Or Proper For The Service, :  
Accommodation, Convenience, Or Safety Of :  
The Public :

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**APPLICATION OF  
PPL ELECTRIC UTILITIES CORPORATION**

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**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

PPL Electric Utilities Corporation ("PPL Electric") herein files this Application, pursuant to 15 Pa.C.S. § 1511(c), for a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain, to acquire right-of-way and easement over a certain portion of the lands of the Heirs of Davis Dean ("Dean"), in West Abington, Lackawanna County. As explained below, the proposed use of eminent domain power to acquire the right-of-way across the Dean property is necessary for the construction of a new 69 kV transmission line needed to supply electric power to a new customer located in Clinton Township, Wyoming County (hereinafter, the "Project"). In support of this Application, PPL Electric states as follows:

## I. INTRODUCTION

1. This Application 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:

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

4. PPL Electric is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania. It was duly formed by consolidation and merger, having received Letters Patent dated June 4, 1920, from the Governor of the Commonwealth of Pennsylvania. PPL Electric is now subject to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, Section 103, *as amended*, 15 Pa.C.S. §§ 1101 *et seq.* ("BCL"). PPL Electric submits this Application pursuant Section 1511 of the BCL, 15 Pa.C.S. § 1511.

5. 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.

6. 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.

7. As explained below, Williams Partners L.P. (“Williams”) proposes to construct a new natural gas compressor station, Station 605, to be located in Clinton Township, Wyoming County. In order to supply power to Williams’s new Station 605, PPL Electric proposes to construct a new 69 kV transmission line that will extend approximately 4.3 miles between the compressor station site and a point of interconnection with PPL Electric’s existing Stanton-Brookside 69 kV Transmission Line. As explained below, the new 69 kV line is necessary for Williams’s new Station 605 to safely and properly operate as designed.

8. A certain portion of the selected route for the proposed Project will traverse a portion of the land owned by Dean in West Abington in Lackawanna County. By this Application, PPL Electric is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the land of Dean for the construction of the proposed 69 kV transmission line is necessary or proper for the service, accommodation, convenience, or safety of the public.

9. Accompanying this Application are supporting testimonies and exhibits that describe the proposed Project, summarize the need for the Project, summarize PPL Electric's process to site the transmission line associated with the Project, describe the Dean property in West Abington, Lackawanna County, Pennsylvania, and describe PPL Electric's proposed right-of-way and easement over said property.

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

10. Williams is a master limited partnership focused on providing large-scale infrastructure connecting the growing supply of North American natural gas and natural gas products to growing global demand. Williams operates the Transco pipeline, which transports natural gas from production areas to customers, such as utility companies and power plants, located throughout the eastern United States.

11. Williams proposes to undertake a new project, the Atlantic Sunrise Project, designed to supply enough natural gas to meet the daily needs of more than 7 million American homes by connecting producing regions in northeastern Pennsylvania to markets in the Mid-Atlantic and Southeastern states. Williams's proposed Atlantic Sunrise Project will, among other things, add 1.7 million dekatherms per day of pipeline capacity to the Transco system.

12. Pertinent to this Application, the Williams Atlantic Sunrise Project involves the construction of approximately 183 miles of new pipeline in Pennsylvania, referred to as the Central Penn Line, that will connect the northeastern Marcellus producing region to the Transco mainline in southeastern Pennsylvania. In order for the new Central Penn Line to operate properly, Williams proposes to construct two new compressor stations, Stations 610 and 605. These compressor stations perform the essential task of compressing natural gas as it travels

through the pipeline. It is this compression that allows the gas to continue flowing through the pipeline and eventually to its final destination for distribution to refineries and other end users.

13. In order for the natural gas compressor stations to operate properly, they must have a reliable source of electric supply. These compressor stations need a reliable source of power for station controls and essential systems.

14. Pertinent to this Application, Williams's new Station 605 will be located in Clinton Township, Wyoming County, which is within PPL Electric's certificated service territory. Williams has requested electric service for its proposed new Station 605.

15. In order to meet the electric needs and demands of the new compressor station, PPL Electric's system planners, in conjunction with Williams, have determined that the new Station 605 must be served at a voltage of 69 kV. Stated otherwise, absent a 69 kV source of supply, Williams's new Station 605 will not operate properly.

16. The site selected for Williams's new Station 605 currently is not served by a 69 kV source. Therefore, PPL Electric proposes to construct a new 69 kV line to provide the power supply necessary for Williams's new Station 605 to safely and properly operate as designed.

17. A further description of the need for the Proposed Project is explained in PPL Electric Statement No. 1.

### **III. DESCRIPTION OF THE PROPOSED PROJECT**

18. Although the site selected for Williams's new Station 605 currently is not served by a 69 kV source, it is located in close proximity to PPL Electric's existing Stanton-Brookside 69-kV Transmission Line.

19. PPL Electric proposes to construct a new 69 kV line that will interconnect Williams's new Station 605 with the existing Stanton-Brookside 69-kV Transmission Line.<sup>1</sup> Use of the existing Stanton-Brookside 69-kV Transmission Line as the source of supply for Williams's new Station 605 Project avoids the need to construct a new longer line with potentially more adverse environmental, land use, and social impacts.

20. PPL Electric conducted an analysis to determine the route for the proposed new 69 kV line. The purpose of this analysis was to identify a route between the existing Stanton-Brookside 69-kV Transmission Line and the site of Williams's new Station 605 that appropriately balances functional requirements, environmental factors, social factors and cost considerations.

21. The Study Area for the proposed Project is the general area in between the existing Stanton-Brookside 69-kV Transmission Line and the site of Williams' new Station 605. In order to identify routing constraints, PPL Electric compiled a detailed environmental inventory of the Study Area. Using that inventory, PPL Electric began the identification of potential routes.

22. Large constraints were identified and possible routes to avoid them to the extent practical were identified. These routes were then adjusted to avoid small constraints to the extent practical. Although complete avoidance of all constraints is not feasible, PPL Electric sought routes that would minimize intrusions into constrained areas.

23. Based on these constraints, twelve potential routes were initially identified. After the initial analysis of these route options, however, four routes were excluded from further consideration due to excessive length, number of parcels crossed, stream crossings and wetland

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<sup>1</sup> PPL Electric is not herein seeking Commission approval to site, locate, construct, or operate the new 69 kV line. A public utility is only required to obtain Commission approval for the authorization and location of "high voltage transmission lines," which are defined as an "overhead electric supply line with a design voltage greater than 100,000 volts" or 100 kV. See 52 Pa. Code §§ 57.1 and 57.71.

impacts, proximity to homes, conflict with existing road and oil/natural gas pipeline infrastructure, and need for excessive tree cutting. The remaining eight potential routes were further analyzed and compared to one another based on potential impacts to natural and cultural resources, the built/human environment, and engineering, constructability, and right-of-way maintenance considerations.

24. Ultimately, PPL Electric selected Route E-2 over the other seven potential routes for the following reasons: (i) it is one of the shortest routes identified; (ii) it minimized environmental impacts; (iii) it has good construction-related access from existing roads; (iv) there are no excessively steep slopes; (v) it does not cross tree farms/orchards; (vi) there is only one occupied dwelling within 100 meters of the proposed route; (vii) it avoids heavily populated areas including urban residential and commercial areas, and schools; (viii) it avoids conflicts with existing infrastructure; (ix) it crosses the lowest number of parcels, thereby minimizing impacts to landowners. For these reasons, PPL Electric concluded that Route E-2 was the overall preferred route. The siting study for the proposed 69 kV transmission line is provided in PPL Electric Statement No. 2.

25. The selected route, Route E-2, extends approximately 4.3 miles from the existing Stanton-Brookside 69-kV Transmission Line and the site of Williams new Station 605. The new 69 kV transmission line will use a 100-foot wide right-of-way that will traverse a total of twenty parcels. A description of the selected route is provided in PPL Electric Statement No. 2.

26. The new 69 kV transmission line will be a single-circuit line design with three power conductors and one overhead ground wire. The new conductors will be 556.5 kcmil<sup>2</sup> 24/7 ACSR<sup>3</sup> conductors. The overhead ground wire will be 48-count, 0.567-inch diameter fiber

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

<sup>3</sup> ACSR stands for aluminum conductor steel reinforced.

optical ground wires that will provide lightning protection and communication between substation breakers that remove the line from service should a fault occur.

27. The new 69 kV line will require approximately 51 new tower structures with an average height of feet 91. The new line will utilize tangent structures with an average height of 91 feet; dead end structures with an average height of 90 feet; tap structures with an average height of 59 feet; and switch structures with an average height of 95 feet. All new poles, except for self-supported dead-end angle structures will utilize direct embedded foundation designs. Depictions of these structure types are provided in PPL Electric Exhibit LL-1 attached to PPL Electric Statement No. 1.

28. A further description of the proposed new 69 kV line is provided in PPL Electric Statement No. 1.

#### **IV. HEALTH AND SAFETY**

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

30. The Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electrical Safety Code ("NESC") minimum standards and all applicable legal requirements. Descriptions of PPL Electric's design criteria and safety practices are provided in PPL Electric Exhibit LL-2 attached to PPL Electric Statement No. 1.

31. Under PPL Electric's Magnetic Field Management Program, the Project will be designed for ground clearances that are a minimum of five feet higher than the required NESC minimum ground clearance for 69 kV lines, which should reduce any potential for exposure to

magnetic fields.<sup>4</sup> A description of PPL Electric's Magnetic Field Management Program is provided in PPL Electric Statement No. 1.

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

33. The closest airport is the Seamans Airport which is located approximately 2.5 miles from the Project area. PPL Electric does not anticipate any interference with airport operations because of the distance from the Project area and the presence of existing electrical facilities in the Project area. However, PPL Electric will file any required documentation with both the Federal Aviation Administration and the Pennsylvania Department of Transportation Bureau of Aviation.

#### **V. PROPERTIES FOR WHICH CONDEMNATION IS SOUGHT**

34. The proposed new 69 kV transmission line will traverse twenty-one parcels using a 100-foot wide right-of-way. To date, PPL Electric has successfully acquired the needed right-of-way for nineteen of the twenty-one parcels.

35. Part of the selected route for the new 69 kV transmission crosses a certain portion of the Dean property. A legal description of the Dean property is provided in PPL Electric Exhibit CK-1 attached to PPL Electric Statement No. 3.

36. PPL Electric desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of the proposed segment of line for the transmission of electric energy for light, heat, and power for Williams's new Station 605. A legal description of the property over which PPL Electric proposes to acquire a right-of-way and easement is provided in PPL Electric Exhibit CK-2 attached to PPL Electric Statement No. 3. A

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<sup>4</sup> Reverse phasing does not apply to the Project because the Project is a single-circuit transmission line.

copy of the plan showing the tract of land subject to the proposed right-of-way and easement is provided in PPL Electric Exhibit CK-3 attached to PPL Electric Statement No. 3.

37. PPL Electric has attempted to purchase the above-described right-of-way and easement over the Dean property for the purposes described above but, to date has been unable to reach any agreement with the property owner. Accordingly, PPL Electric herein files this Application for a finding and determination, pursuant to 15 Pa.C.S. § 1511(c), that the service to be furnished through PPL Electric's proposed exercise of the power of eminent domain for the new 69 kV line needed to serve the Williams's Station 605 is necessary or proper for the service, accommodation, convenience, or safety of the public.

38. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.

#### **VI. THE REQUIREMENTS FOR CONDEMNATION HAVE BEEN SATISFIED**

39. No other public utility is now furnishing or has the corporate authority and certificate to furnish the same service as, or service similar to, that which PPL Electric will furnish by means of the transmission line to be constructed in the proposed right-of-way and easement over the land to be acquired as set forth in this Application.

40. The service to be furnished by PPL Electric through the proposed 69 kV transmission line and related facilities is necessary or proper to provide electric service to Williams's new Station 605.

41. Appropriate resolutions were adopted by PPL Electric's Board of Directors authorizing and directing this Application. A copy of the applicable resolutions is provided in PPL Electric Exhibit CK-4 attached to PPL Electric Statement No. 3.

**VII. CONSOLIDATION OF RELATED PROCEEDINGS**

42. Contemporaneously with the filing of this Condemnation Application, PPL Electric is separately filing the "Application Of PPL Electric Utilities Corporation Under 15 Pa.C.S. § 1511(c) For A Finding And Determination That The Service To Be Furnished By The Applicant Through Its Proposed Exercise Of The Power Of Eminent Domain To Acquire Right-of-Way And Easement Over A Certain Portion Of The Lands Of Dalton Equity, Inc., In West Abington, Lackawanna County, Pennsylvania is Necessary or Proper for the Service, Accommodation, Convenience, or Safety of the Public" (the "Dalton Condemnation Application"). Issues relating to the need for the Dalton Condemnation Application are interrelated with this Application.


43. 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.

## VIII. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the "Dalton Condemnation Application" contemporaneously filed herewith, and (2) determine that the service to be furnished by PPL Electric Utilities Corporation through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Respectfully submitted,

Kimberly A. Klock (I.D. #89716)  
PPL Services Corporation  
Two North Ninth Street  
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Voice: 610-774-5696  
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Of Counsel:  
Post & Schell, P.C.

Dated: October 14, 2016

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: 10/11/14

Stephanie Raymond

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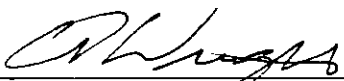
**CERTIFICATE OF SERVICE**

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**

Dalton Equity Inc.  
1144 E. Drinker Street  
Dunmore, PA 18512

Date: October 14, 2016

  
\_\_\_\_\_  
Christopher T. Wright

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