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File #: 165214

August 4, 2017

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: Letter of Notification of PPL Electric Utilities Corporation, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to Rebuild Approximately 8.5 miles of 138/69 kV Transmission Line in Franconia and Hatfield Townships, Montgomery County, and West Rockhill Township, Bucks County, Pennsylvania
Docket No. A-2017-2613595**

Dear Secretary Chiavetta:

Enclosed please find the Responses of PPL Electric Utilities Corporation to the Bureau of Technical Utility Services Data Requests for filing in the above-referenced proceeding.

Respectfully submitted,

Christopher T. Wright

CTW/jl
Enclosures

cc: Jordan Van Order (*via E-mail only*)

Letter of Notification of PPL Electric Utilities Corporation, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to Rebuild Approximately 8.5 miles of 138/69 kV Transmission Line in Franconia and Hatfield Townships, Montgomery County, and West Rockhill Township, Bucks County, Pennsylvania
Docket No. A-2017-2613595

Response to Technical Utility Staff Data Requests
(Response dated 8/04/2017)

A-1. Reference LON, Paragraph 19, the last sentence is unclear. Please clarify.

Response:

As explained in Attachment 1, the existing Elroy-Hatfield #1 and #2 13869 kV transmission lines will be rebuilt for approximately 0.25 miles from the tap point with the Elroy Substation to the Hatfield Substation. As explained in Attachment 2, the existing 0.25 mile segment consists primarily of 30 wood pole structures that will be removed and replaced with 25 new steel monopole structures.

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- A-2. Reference the LON, Attachment 1 generally describing, among other things, the Regional Transmission Expansion Plan. Please provide the PJM project ID number and the date when the project was presented to PJM.

Response:

In the Letter of Notification filed on July 7, 2017, at Docket No. A-2017-2613595, PPL Electric requested approval from the Commission to rebuild the approximately 7.8-mile Buxmont-Elroy #1 and #2 69 kilovolt (“kV”) transmission lines, the approximately 0.25-mile section of the Elroy-Hatfield #1 and #2 138/69 kV transmission lines, the approximately 0.35-mile Elroy #1 and #2 138/69 kV transmission taps, and the approximately 354-foot Hatfield #1 and #2 69 kV transmission taps.

Typically, only non-baseline projects that result in a change to the electrical characterization of the transmission system are submitted as supplemental projects. The proposed Project was not submitted to PJM as a supplemental project because it does not change the electrical characterization of the transmission system (i.e., line topology or ratings). As such, the proposed Project is not a PJM RTEP baseline or supplemental project.

The fact that the proposed Project was not submitted to PJM to be included as supplemental project is not dispositive or otherwise changes the clear need for the Project. As explained in detail in Attachment 1 to the Letter of Notification, PPL Electric has developed an Asset Optimization Strategy that is incorporated into its Transmission System Development Standards. A significant portion of the PPL Electric 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 aging facilities. The measures 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 measures, it is put into the Capital Budget for replacement under the Asset Optimization Strategy.

The purpose of the proposed Project is to rebuild aging and deteriorated transmission line facilities. The Buxmont-Elroy #1 and #2 69 kV transmission lines, Elroy-Hatfield #1 and #2 138/69 kV transmission lines, Elroy #1 and #2 138/69 kV transmission taps, and Hatfield #1 and #2 69 kV transmission taps have reached an age and condition that the facilities must be replaced in order to provide safe and reliable service. As stated in Attachment 1 to the Letter of Notification, the tower structures, foundations, insulators,

hardware, shield wires, and grounding along these transmission lines have reached the end of their useful lives and should be rehabilitated or replaced in order to continue to provide safe and reliable service to approximately 17,060 customers as well as five transmission customers in Bucks and Montgomery Counties. Importantly, if these aging facilities are not replaced, there is substantial risk that they could fail, which could cause significant safety and reliability concerns for the public and employees.

PPL Electric evaluated the cost to rehabilitate the Buxmont-Elroy #1 and #2 69 kV transmission lines, the Elroy-Hatfield #1 and #2 138/69 kV lines, Elroy #1 and #2 138/69 kV transmission taps, and Hatfield #1 and #2 69 kV transmission taps and concluded that the total cost to rehabilitate these lines would be greater than the cost to completely rebuild them within the same right-of-way. Therefore, the rebuild of these aging and deteriorated transmission lines is the most prudent and cost-effective option.

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- A-3. Reference the LON, Attachment 2 including the specifications for poles to be used in the proposed project. Please state which specification is applicable to the dead end structures referenced in Attachment 2, page 2-3 or provide the specification for the dead end structures.

Response:

The specifications for the dead end structures reference in Attachment 2, page 2-3 are same as the specification 7-008-004 provided in Figure 2-4 of Attachment 2. On PPL Electric system, an "angle tension one arm structure" is the same thing as a "dead end structure" referenced on page 2-3 of Attachment 2.

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- A-4. Reference the LON, Attachment 2, page 2-3 describing how PPL will meet the National Electric Safety Code horizontal clearance requirements in areas with a narrow right-of-way. Please explain how the use of dead end structures will mitigate right-of-way width concerns and state the number and locations where these structures are required.

Response:

As stated in Attachment 2 to the Letter of Notification, the entire proposed Project will be located within the existing right-of-way and on property owned in fee by PPL Electric. The existing right-of-way varies from approximately 40 to 100 feet in width. PPL Electric has designed the proposed Project to fit entirely within the existing right-of-way.

The design of the proposed Project will account for areas with narrow right-of-way by designing the new line for decreased "blow-out," which is essentially the sway of the conductors from the centerline to the edge of right-of-way under severe weather conditions. In order to accomplish this, the proposed Project has been designed to include dead end structures¹ designed for higher conductor tensions, which results in less sway or "blow-out," and/or the use of horizontal line post insulators,² which will help keep the conductors closer to the right-of-way centerline. These design measures will ensure that the proposed Project will fit within the existing right-of-way and meet all horizontal clearance requirements for the National Electric Safety Code.

Importantly, as stated in Attachment 3 to the Letter of Notification, the new tower structures, including any dead end structures, will be placed in close proximity to the location of the existing towers and no new structures will be placed on property that currently does not have an existing structure.

¹ See specification 7-008-004 provided in Figure 2-4 of Attachment 2.

² See specification 207-008-030 provided in Figure 2-8 of Attachment 2.

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- A-5. Reference the LON, Paragraph 51 stating that information regarding the project was provided to representatives of Lower Milford Township and Lehigh County. Please clarify this apparent discrepancy.

Response:

The reference to Lower Milford Township and Lehigh County in Paragraph 51 of the Letter of Notification was an inadvertent transcription error. PPL Electric previously discussed the project with representatives from Franconia, Hatfield, and West Rockhill Townships and Montgomery and Bucks Counties. These entities did not object to the proposed Project. Moreover, as required by 52 Pa. Code § 72.73(d)(3), copies of the complete filing were served on these entities as shown on the Certificate of Service submitted with the Letter of Notification. Although not required by the Commission's siting regulations, PPL Electric's general practice is to, among other things, meet with representatives of local governments as part of its public outreach efforts to educate and solicit input on proposed transmission line projects. However, PPL Electric notes that review and pre-approval from local municipalities is not required under the Commission's siting regulations. *See also Duquesne Light Company v. Monroeville Borough*, 449 Pa. 573, 580, 298 A.2d 252, 256 (1972) ("the Public Utility Commission has exclusive regulatory jurisdiction over the implementation of public utility facilities and courts have consistently held that public utility facilities are exempt from local regulation) (citations omitted); *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 Township v. Philadelphia Elec. Co.*, 594 A.2d 834, 837 (Pa. Cmwlth. 1991) (no implied power exists that would allow a municipality to regulate a utility through subdivision and land development ordinances); *Heintzel v. Zoning Hearing Board of Millcreek Township*, 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 Township v. Philadelphia Elec. Co.*, 504 A.2d 368 (Pa. Cmwlth. 1986) (noting that to possibly subject a public utility 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 local governments are not authorized to regulate public utilities in any manner which infringes upon the power of the Commission to so regulate).

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- A-6. Please provide a Certificate of Service for Melissa Grimes, Nancy White, Jacob A. & Cheramie J. Benfield, Edward G. Schnell, Michael Jr. & Roseanne Lynch, Benjamin & Jeanett Rodriguez, Dennis & Christina L. Lunemann, and Edmund G. Nieginski.

Response:

Edmund G. Nieginski was served with a complete copy of the Letter of Notification as shown on page 8 of the original Certificate of Service filed with the Secretary's Bureau on July 7, 2017.

The remaining landowners (Melissa Grimes, Nancy White, Jacob A. & Cheramie J. Benfield, Edward G. Schnell, Michael Jr. & Roseanne Lynch, Benjamin & Jeanett Rodriguez, Dennis & Christina L. Lunemann) were inadvertently omitted from the service list and, as a result, were not served with a copy of the filing. A complete copy of the Letter of Notification has been served on these landowners and a corresponding Certificate of Service has been filed with the Secretary's Bureau. A copy of this Certificate of Service is also attached hereto as Attachment A-6.1.



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717-731-1985 Direct Fax
File #: 165214

August 4, 2017

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: Letter of Notification of PPL Electric Utilities Corporation, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to Rebuild Approximately 8.5 miles of 138/69 kV Transmission Line in Franconia and Hatfield Townships, Montgomery County, and West Rockhill Township, Bucks County, Pennsylvania
Docket No. A-2017-2613595

Dear Secretary Chiavetta:

On July 7, 2017, the Letter of Notification of PPL Electric Utilities Corporation was filed in the above-referenced proceeding. The following property owners were inadvertently omitted from the Certificate of Service in that original filing:

Jacob A & Cheramie J Benfield
886 Evergreen Circle
Telford, PA 18969

Melissa Grimes
693 Cedar Lane
Telford, PA 18969

Barbara A. Kline-Molettieri
114 Front Street
East Greenville, PA 18041

Dennis & Christina L. Lunemann
1055 Garrison Lane
Souderton, PA 18964

Michael Jr. & Roseanne Lynch
13086 Dorothy Drive
Philadelphia, PA 19116

Benjamin & Jeanett Rodriguez
1049 Garrison Lane
Souderton, PA 18964

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Edward G. Schnell
221 Winding Way
Telford, PA 18969

Nancy White
879 Evergreen Circle
Telford, PA 18969

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

Also, the following Certified Mail packages have been returned to our office by the United States Postal Service marked "Return to Sender – Unable to Forward."

**Certificate of Service
dated July 7, 2017**

**Supplemental Certificate of Service
dated August 4, 2017**

Art Mortgage Borrower Propco 2010-5 LLC
3520 Piedmont Rd
Atlanta, GA 30305-1512

Art Mortgage Borrower Propco 2010-5 LLC
c/o Marvin F. Poer & Co
3520 Piedmont Road North Suite 410
Atlanta, GA 30305

Gretz Beverage Montoco Inc.
710 Main Street
Norristown, PA 19401-4102

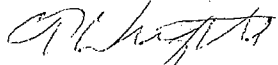
Gretz Beverage Montco Inc.
DBA Gretz Beer Company
2801 Township Line Road
Hatfield, PA 19440

Banbury Limited Partnership
209 Green Street
Souderton, PA 18964-1795

Banbury Limited Partnership
548 Creekside Drive
Souderton, PA 18964

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

Respectfully submitted,


Christopher T. Wright

CTW/jl
Enclosures

cc: Kimberly Hafner
Supplemental Certificate of Service

SUPPLEMENTAL CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the **Letter of Notification** filed **July 7, 2017**, 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**

Art Mortgage Borrower Propco 2010-5 LLC
c/o Marvin F. Poer & Co
3520 Piedmont Road North Suite 410
Atlanta, GA 30305

Gretz Beverage Montco Inc.
DBA Gretz Beer Company
2801 Township Line Road
Hatfield, PA 19440

Banbury Limited Partnership
548 Creekside Drive
Souderton, PA 18964

Jacob A & Cheramie J Benfield
886 Evergreen Circle
Telford, PA 18969

Melissa Grimes
693 Cedar Lane
Telford, PA 18969

Barbara A. Kline-Molettieri
114 Front Street
East Greenville, PA 18041

Dennis & Christina L. Lunemann
1055 Garrison Lane
Souderton, PA 18964

Michael Jr. & Roseanne Lynch
13086 Dorothy Drive
Philadelphia, PA 19116

Benjamin & Jeanett Rodriguez
1049 Garrison Lane
Souderton, PA 18964

Edward G. Schnell
221 Winding Way
Telford, PA 18969

Nancy White
879 Evergreen Circle
Telford, PA 18969

Date: August 4, 2017



Christopher T. Wright

VERIFICATION

I, Dave Gladey being the Director of Asset Management 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: 8/31/17

