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November 14, 2017

***BY ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street – Filing Room  
Harrisburg, PA 17120

RE: Application of PPL Electric Utilities Corporation For approval to Rebuild the Hosensack Quarry # 1 and #2 138/69kV Transmission Line in Lehigh and Northampton Counties, Pennsylvania; Docket No. A-2017-2625559; **PSU PETITION TO INTERVENE**

Dear Secretary Chiavetta:

Enclosed you will find The Pennsylvania State University's Petition to Intervene in the above-referenced proceedings. Copies have been served in accordance with the attached Certificate of Service.

If you have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,

Thomas J. Sniscak  
Christopher M. Arfaa  
*Counsel to The Pennsylvania State University*

TJS/das  
Enclosure

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities :  
Corporation For approval to Rebuild the :  
Hosensack Quarry # 1 and #2 138/69kV :           Docket No. A-2017-2625559  
Transmission Line in Lehigh and :  
Northampton Counties, Pennsylvania :

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**PETITION TO INTERVENE OF  
THE PENNSYLVANIA STATE UNIVERSITY**

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**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

Pursuant to 52 Pa. Code §§ 5.71-.76, and the Prehearing Order dated October 2, 2017, The Pennsylvania State University (“PSU” or “Penn State”), by its undersigned counsel, Hawke McKeon & Sniscak LLP, files this Petition to Intervene in the above-captioned proceeding. In support of its Petition, PSU states as follows:

**I. PROCEDURAL BACKGROUND**

1. On September 19, 2017, PPL Electric Utilities Corporation (“PPL Electric”) filed with the Pennsylvania Public Utility Commission (the “Commission”) the *Application of PPL Electric Utilities Corporation filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval to Rebuild the Hosensack - Quarry #1 and #2 138/69 kV Transmission Line in Lehigh and Northampton Counties, Pennsylvania*, which was assigned Docket No. A-2017-2625559 (the “Application”).

2. On September 29, 2017, the Commission issued a Notice stating that an Initial Prehearing Conference would be held in the above-captioned case on December 4, 2017, with Administrative Law Judge Steven K. Haas (the “ALJ”) presiding.

3. On or about October 2, 2017, the ALJ issued a prehearing order in this case (the “Prehearing Order”). The Prehearing Order, *inter alia*, confirmed the due date for petitions to intervene and protests and the prehearing conference and, in addition, directed each party to prepare and file a prehearing memorandum on or before November 29, 2017.

4. The Commission published a notice of the Application in the Pennsylvania Bulletin on October 14, 2017, 47 Pa. B. 6451 (Oct. 14, 2017) (the “Notice”). The Notice states that formal protests and petitions to intervene must be filed and served in accordance with the Commission’s regulations at 52 Pa. Code on or before November 27, 2017, and that the initial prehearing conference will be held before the ALJ on December 4, 2017.

5. The Application seeks approval to rebuild approximately 14.6 miles of the existing Hosensack – Quarry #1 and #2 138/69 kV Transmission Lines located in Lehigh and Northampton Counties, Pennsylvania (the “Project”). With a few minor exceptions, the route proposed by the Application (the “Proposed Route”) involves rebuilding the 14.6-mile segment of the existing lines within the existing right-of-way.

## **II. PENN STATE’S RIGHT OR INTEREST IN THIS PROCEEDING**

6. PSU’s Lehigh Valley campus includes an improved lot located in Center Valley, Pennsylvania which is bounded by Center Valley Parkway, Saucon Creek Road, and Saucon Valley Road (the “Lehigh Valley Campus”).

7. In the Application, the Lehigh Valley Campus is labeled parcel no. 91. In Attachment 4 to the Application, at Ariel Exhibit Tile 5 of 7 (unnumbered page 4-66), the Proposed Route is shown as crossing the Lehigh Valley Campus along its western edge, to the east of and roughly parallel to Saucon Valley Road between its intersections with Center Valley Highway and

Camp Meeting Road. It thus appears that the Proposed Route would utilize an existing PPL Electric right-of-way across that portion of PSU's Lehigh Valley campus.

8. The Application proposes rebuilding the transmission lines within existing rights-of-way. Upon information and belief, the Application proposes siting the rebuilt transmission lines within the existing PPL right-of-way at the western edge of the Lehigh Valley Campus.

### **III. GROUNDS OF THE PROPOSED INTERVENTION**

9. The resolution of this proceeding likely will affect PSU's rights with respect to the occupation and use of those portions of the Lehigh Valley Campus subject to, and/or proximate to, the right-of-way in which PPL Electric seeks site the Project.

10. Therefore, PSU seeks to intervene in this proceeding to protect its rights to occupy, use and otherwise enjoy the Lehigh Valley Campus.

### **IV. PETITIONER'S POSITION REGARDING THE ISSUES IN THE PROCEEDING**

11. PSU's position is that the project should not impose a greater burden on the Lehigh Valley Campus than is currently imposed by the existing PPL Electric facilities. Currently, there are no transmission line support structures within the PPL Electric right-of-way across the Lehigh Valley Campus. PSU would therefore oppose proposals that would require the erection of new support structures within the Lehigh Valley Campus right-of-way. PSU would also oppose proposals that would require expansion of the existing right-of-way across the Lehigh Valley Campus, or require reduced elevation of the transmission lines that traverse the Lehigh Valley Campus.

12. PSU's review of the Application is continuing, and PSU reserves the right to take new or different positions on the issues presented by the Application or by other parties to this proceeding.

V. **CONCLUSION**

Wherefore, for all of the foregoing reasons, PSU respectfully requests that its Petition to Intervene in the above-captioned proceeding be granted.

Respectfully submitted

Dated: November 14, 2017



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*Counsel for  
The Pennsylvania State University*

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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ATTN: Christopher A. Urban

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Certificate of Service  
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Thomas J. Sniscak  
Christopher M. Arfaa

Dated this 14<sup>th</sup> day of November, 2017.