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Christopher T. Wright

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File #: 165402

November 14, 2017

***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

**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 Bryan S. Lebo and Dwayne C. Lebo in Upper Allen Township in Cumberland County, Pennsylvania is Necessary or Proper for the Service, Accommodation, Convenience, or Safety of the Public - Docket No. A-2017-**

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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 – Direct Testimony of Christopher R. Szmodis

Statement No. 2 – Direct Testimony of Peter Sparhawk

Statement No. 3 – Direct Testimony of Austin K. Weseloh

A CD containing a copy of the Application, Direct Testimony, and supporting attachments is also enclosed.

A check in the amount of \$350 is enclosed for payment of the filing fee.

Rosemary Chiavetta, Secretary  
November 14, 2017  
Page 2

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

Respectfully submitted,



Christopher T. Wright

CTW/jl  
Enclosures

cc: Certificate of Service

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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**

Bryan S. Lebo  
Dwayne C. Lebo  
1704 Fisher Road  
Mechanicsburg, PA 17055

Date: November 14, 2017

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

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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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 : Docket No. A-2017- \_\_\_\_\_  
 Proposed Exercise of the Power of Eminent :  
 Domain to Acquire Right-of-Way and :  
 Easement over a Certain Portion of the Lands :  
 of **Bryan S. Lebo and Dwayne C. Lebo** in :  
 Upper Allen Township in Cumberland 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 owned by Bryan S. Lebo and Dwayne C. Lebo in Upper Allen Township, Cumberland County, Pennsylvania is necessary or proper for the service, accommodation, convenience, or safety of the public. As explained below, the proposed use of eminent domain power to acquire the right-of-way across the property owned by Bryan S. Lebo and Dwayne C. Lebo is necessary for the construction of new 69 kV transmission lines needed to avoid multiple reliability issues, and to reinforce the electric systems serving Cumberland 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:

Kimberly A. Klock (ID #89716)  
Amy E. Hirkis (ID #310094)  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
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David B. MacGregor (I.D. # 28804)  
Christopher T. Wright (I.D. # 203412)  
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E-mail: [cwright@postschell.com](mailto:cwright@postschell.com)

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, PPL Electric proposes to construct two new double-circuit 69 kV transmission lines, the double-circuit Williams Grove - West Shore #1 and #2 69 kV transmission lines and the double-circuit Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines. The new Williams Grove - West Shore #1 and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines are needed to avoid multiple reliability issues, and to reinforce the electric systems serving Cumberland County.

8. The proposed new double-circuit Williams Grove - West Shore #1 and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines will parallel each other using a shared right-of-way. A certain portion of the route selected for the shared right-of-way will traverse a portion of the land owned by Bryan S. Lebo and Dwayne C. Lebo in Upper Allen Township, Cumberland County.

9. 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 owned by Bryan S. Lebo and Dwayne C. Lebo for the construction of the proposed new Williams Grove - West Shore #1

and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines is necessary or proper for the service, accommodation, convenience, or safety of the public.

10. 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 Lebo property in Upper Allen Township, Cumberland County, Pennsylvania, and describe PPL Electric's proposed right-of-way and easement over said property.

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

11. The proposed Project is one part of a large comprehensive plan to improve the reliability of service to approximately 130,000 customers served from the West Shore, Cumberland, and Juniata 230-69 kV regional substations in the greater Harrisburg area.

12. This comprehensive plan will improve the reliability of the transmission and distribution systems serving the greater Harrisburg area by replacing facilities that have reached the end of their useful lives, and do not meet current design standards, with modern facilities that meet current design standards and have the technical ability to reduce the potential and duration of outages experienced by customers. The improved transmission and distribution systems will allow quicker load restoration after a system interruption, which will contribute to a higher level of reliability for the customers served from these lines.

13. Presently, customers in Cumberland County receive their bulk electric power supply from two regional transmission substations, the Cumberland 230-69 kV Substation and the West Shore 230-69 kV Substation. The Cumberland 230-69 kV Substation and the West Shore 230-69 kV Substation supply several 69 kV transmission lines, which in turn supply various 69-12 kV distribution substations in Cumberland County.

14. The Cumberland – West Shore #3 and Cumberland – West Shore #4 69 kV transmission lines extend approximately 20 miles and 23 miles, respectively, between the Cumberland and West Shore 230-69 kV Substations. The Cumberland – West Shore #3 and Cumberland – West Shore #4 69 kV transmission lines are networked lines that occupy common tower structures.<sup>1</sup> The Cumberland – West Shore #3 and Cumberland – West Shore #4 69 kV transmission lines collectively serve approximately 30,646 customers in Cumberland County. A description and one-line diagram of the existing system is provided in PPL Electric Exhibit CRS-1 attached to PPL Electric Statement No. 1 (Lebo).

15. Studies conducted for PPL Electric’s transmission system, in conjunction with the PJM Interconnection, LLC (“PJM”) Regional Transmission Expansion Plan (“RTEP”) process, revealed that the Cumberland – West Shore #3 and Cumberland – West Shore #4 69 kV transmission lines are at risk of excessive load drop by the summer of 2018 in violation of PPL Electric’s reliability practices. Detailed descriptions of the PJM RTEP process, PPL Electric’s system planning process, and PPL Electric’s reliability practices are provided in PPL Electric Exhibit CRS-1 attached to PPL Electric Statement No. 1 (Lebo).

16. PPL Electric studies concluded that, by the summer of 2018, an outage of the networked Cumberland – West Shore #3 and #4 69 kV transmission lines due to a tower structure failure would result in the loss of 165 MW load or 30,646 customers in Cumberland County until repairs could be made.

17. In addition, as explained in PPL Electric Statement No. 1 (Lebo), operating the Cumberland – West Shore #3 and #4 69 kV transmission lines in a networked configuration

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<sup>1</sup> In a “networked” configuration, the transmission line has a voltage source and power supply available at each end of the line. Power can flow from either end of the line to serve customer load.

presents serious technical concerns and is less reliable than a radial configuration.<sup>2</sup> With the current transmission topology in the Cumberland County area, the Cumberland-West Shore #3 & #4 69 kV transmission lines are required to remain in network operation to maintain proper thermal load support on the system.

18. A further description of the need for the proposed Project is explained in PPL Electric Statement No. 1 (Lebo).

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

19. To resolve these reliability issues and to improve service to customers in Cumberland County, PPL Electric plans to construct a new Williams Grove 230-69 kV Substation in Upper Allen Township, Cumberland County, Pennsylvania.<sup>3</sup>

20. PPL Electric proposes to construct two new double-circuit 69 kV transmission lines that will be interconnected with the new Williams Grove 230-69 kV Substation: the double-circuit Williams Grove - West Shore #1 and #2 69 kV transmission line and the double-circuit Williams Grove - Mechanicsburg #1 and #2 69 kV transmission line.

21. The proposed new Williams Grove - West Shore #1 and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines will interconnect with the Williams Grove 230-69 kV Substation and tie into the existing Cumberland-West Shore #3 & #4 69 kV transmission lines.

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<sup>2</sup> In a "radial" configuration, the transmission line has a voltage source and power supply available at only one end of the line. Power will flow from the transmission substation (230-69 kV) source to the loads along the line.

<sup>3</sup> The site for the proposed Williams Grove Substation is crossed by the existing 11.6-mile, single-circuit Cumberland - West Shore 230 kV Transmission Line. This line will be split and tied into the Williams Grove Substation. PPL Electric is separately filing for Commission approval of the 230 kV transmission line work associated with interconnecting the new Williams Grove Substation with the 230 kV system.

22. The proposed new double-circuit Williams Grove - West Shore #1 and #2 69 kV transmission lines and the double-circuit Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines will parallel each other using separate tower structures within a shared right-of-way, *i.e.*, both new double-circuit transmission lines will be located within the same right-of-way.

23. The new Williams Grove 230-69 Substation will provide a new 230 kV backbone source that will be located more central to the load it will serve. The new Williams 230-69 kV Substation, together with the proposed new Williams Grove - West Shore #1 and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines, will: (i) remediate the significant initial load drop violation described above; (ii) reduce the overhead transmission line exposure by shortening the distances of the Cumberland-West Shore #3 & #4 69 kV transmission lines; and (iii) allow the Cumberland-West Shore #3 & #4 69 kV transmission lines to be operated radially, rather than in network, to improve system reliability. The proposed Project will provide an alternate supply of power to the customers in Cumberland County in the event that the normal supply is interrupted, which will improve power restoration times and provide operating flexibility and improved reliability.

24. PPL Electric conducted a siting analysis to identify routes for each of the proposed new double-circuit 69 kV lines that appropriately balance functional requirements, environmental factors, social factors and cost considerations. The purpose of the siting analysis was to identify a route between the new Williams Grove 230-69 kV Substation and the existing Cumberland-West Shore #3 & #4 69 kV transmission lines.

25. PPL Electric's siting analysis sought to minimize potential impacts to natural and cultural resources, the built/human environment, and engineering, constructability, and right-of-

way maintenance considerations. A description of PPL Electric's siting analysis is provided in PPL Electric Statement No. 2 (Lebo).<sup>4</sup>

26. The route selected for the proposed new the proposed new double-circuit Williams Grove - West Shore #1 and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines will extend approximately 2.0 miles from the Williams Grove 230-69 kV Substation to the existing Cumberland-West Shore #3 & #4 69 kV transmission lines.

27. The new double-circuit Williams Grove - West Shore #1 and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines will occupy a shared approximately 150-foot wide right-of-way that will traverse a total of ten (10) parcels. A description of the selected route is provided in PPL Electric Statement No. 2 (Lebo).

28. The new Williams Grove - West Shore #1 and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines will both be a double-circuit line design with six power conductors and two overhead ground wires, which will provide lightning protection and communication between substation breakers that remove the line from service should a fault occur.

29. The new Williams Grove - West Shore #1 and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines will each require approximately 25 new tower structures, with an average height of 88 feet. All new poles, except for self-supported dead-end angle structures will utilize direct embedded foundation designs. Depictions of these

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<sup>4</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.

structure types are provided in PPL Electric Exhibit CRS-2 attached to PPL Electric Statement No. 1 (Lebo).

30. A further description of the proposed new Williams Grove - West Shore #1 and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines is provided in PPL Electric Statement No. 1 (Lebo).

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

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

32. The Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electrical Safety Code ("NSEC") minimum standards and all applicable legal requirements. Descriptions of PPL Electric's design criteria and safety practices are provided in PPL Electric Exhibit CRS-3 attached to PPL Electric Statement No. 1 (Lebo).

33. 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. Further, the new Williams Grove - West Shore #1 and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines will be reverse phased to further minimize the potential for exposure to magnetic fields. A description of PPL Electric's Magnetic Field Management Program is provided in PPL Electric Exhibit CRS-5 attached to PPL Electric Statement No. 1 (Lebo).

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

35. The closest airport is the Vogelsong Airport, which is located approximately 4 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**

36. As explained above, the proposed new double-circuit Williams Grove - West Shore #1 and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines will parallel each other using a shared right-of-way. The shared right-of-way will be approximately 150 feet wide and will traverse ten (10) parcels.

37. A certain portion of the route selected for the shared right-of-way will traverse a portion of the land owned by Bryan S. Lebo and Dwayne C. Lebo. The name and post office address of the owners of said land are: Bryan S. Lebo and Dwayne C. Lebo, 1704 Fisher Road, Mechanicsburg, PA 17055. A legal description of the Lebo property is provided in PPL Electric Exhibit AKW-1 attached to PPL Electric Statement No. 3 (Lebo).

38. PPL Electric desires to acquire a right-of-way and easement over the aforesaid land for the construction, operation, and maintenance of the proposed new double-circuit Williams Grove - West Shore #1 and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines. 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 AKW-2 attached to PPL Electric Statement No. 3 (Lebo). A copy of the plan showing the tract of land subject to the

proposed right-of-way and easement is provided in PPL Electric Exhibit AKW-3 attached to PPL Electric Statement No. 3 (Lebo).

39. PPL Electric has attempted to purchase the above-described right-of-way and easement over the Lebo 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 double-circuit Williams Grove - West Shore #1 and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines is necessary or proper for the service, accommodation, convenience, or safety of the public.

40. 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**

41. 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.


42. The service to be furnished by PPL Electric through the proposed new double-circuit Williams Grove - West Shore #1 and #2 and Williams Grove - Mechanicsburg #1 and #2 69 kV transmission lines and related facilities is necessary or proper to provide safe and reliable electric service to customers in Cumberland County.

43. 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 AKW-5 attached to PPL Electric Statement No. 3 (Lebo).

**VII. CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission 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,

  
David B. MacGregor (I.D. # 28804)  
Christopher T. Wright (I.D. # 20341)  
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Of Counsel:  
Post & Schell, P.C.

Dated: November 14, 2017

Attorneys for PPL Electric Utilities Corporation

**VERIFICATION**

I, STEPHANIE R. 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: 11/9/17

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**POST & SCHELL**<sup>INC.</sup>  
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