



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Main Fax  
www.postschell.com

---

Lindsay A. Berkstresser

lberkstresser@postschell.com  
717-612-6021 Direct  
717-731-1977 Direct Fax  
File #: 165209

July 25, 2018

***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 of the Siting and Construction of the Siegfried-East Palmerton #1 & #2 183/69 kV Transmission Lines and Associated Tap Lines Located in Lehigh and Carbon Counties, Pennsylvania  
Docket No. A-2018-3001477**

---

Dear Secretary Chiavetta:

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

Respectfully submitted,

Lindsay A. Berkstresser

LAB/jl  
Enclosures

cc: Jordan Van Order (*Via E-mail*)

**PPL Electric Utilities Corporation**  
**Response to Data Requests of**  
**Bureau of Technical Utility Services**  
**Dated July 18, 2018**  
**Docket No. A-2018-3001477**

Q-9                   Reference the Letter of Notification, Paragraph 17. Please explain why the subject section of the Siegfried-East Palmerton 138/69 kV Transmission Line, Palmerton 138 kV tap, and the Palmerton Zinc 138/69 kV tap need to be rebuilt to 138 kV standards.

A-9                   PPL Electric is seeking to rebuild these facilities due to the age and condition of these facilities. These lines are currently designed for 138kV standard operation but are energized at 69kV. PPL Electric is proposing to rebuild these lines to the same 138 kV standard. This provides PPL Electric the ability to operate these lines at 138kV in the future without having to rebuild the lines again. The operation of these circuits today operating at 69kV have limited load ability to pick up or transfer customers when needed in response to a system event. Designing these circuits to 138kV operation allows for future load transfer capability in the event of an outage that would compromise the normal circuit capability needed to restore customers in a timely manner.

The proposed rebuild of these facilities as described in the LON is consistent with PPL Electric's long-standing practice of designing such facilities to a 138 kV standard even though the lines will be initially operating at 69 kV. The proposed design allows PPL Electric the ability to increase the operating voltage of the lines, when needed, without having to rebuild the lines again. It would not be practical to replace an existing 138 kV facility with a 69 kV design. The cost to build the facilities at a 138 kV design is approximately 5-10% more than the cost to build the facilities at 69 kV. If the facilities were to be built at 69 kV, the entire facilities would have to be rebuilt if 138 kV operation were needed in the future. The standard practice of rebuilding lines to a 138 kV design to replace the existing 138 kV design, even though the lines will initially operate at 69 kV, has been previously approved by the Commission on multiple occasions. See, e.g., *Application of PPL Electric Utilities Corporation, for Approval to Rebuild 14.6 Miles of the Hosensack-Quarry #1 and #2 138/69 kV Transmission Line in Lower Milford, Upper Saucon, and Salisbury Townships, Lehigh County and Lower Saucon Townships, Northampton County, Pennsylvania*, Docket No. A-2017-2625559 (Order entered April 19, 2018, p. 6) ("rebuild [138 kV] transmission line will initially operate as a double-circuit 69 kV line until load growth in the area makes it appropriate to increase the operating

voltage.”); *Joint Petition of PPL Electric Utilities Corporation for a Waiver of Certain Provisions of the Pennsylvania Public Utility Commission’s Regulations at 52 Pa. Code §57.71 et seq., and a Letter of Notification of PPL Electric Utilities Corporation, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval of the Siting and Construction of the Paupack-Honesdale #1 & #2 138/69 kV Transmission Line in Paupack, Palmyra and Cherry Ridge Townships, Wayne County, Pennsylvania*, Docket No. A-2012-2315540 (Order entered October 24, 2012, p. 9) (“the proposed Paupack-Honesdale kV Transmission Line will be designed and constructed for future 138 kV, double circuit operation but initially will be operated as a double circuit 69 kV until load growth in the area makes it appropriate to increase the operating voltage.”)

**VERIFICATION**

I, PHIL OSEI PENNY, being the Manager- Transmission Planning 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: 7/24/18

 \_\_\_\_\_