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File #: 166392

April 9, 2019

***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: Application of PPL Electric Utilities Corporation for Approval to Rebuild the Existing Breinigsville-Alburtis 500 kV Transmission Line in Lehigh County, Pennsylvania**  
**Docket No. A-2019-3007945**

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Dear Secretary Chiavetta:

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

Respectfully submitted,

  
Lindsay A. Berkstresser

LAB/jl  
Enclosures

cc: Jordan Van Order (via E-mail)

[WITNESS: Frank J. Richardson, II]

PPL Electric Utilities Corporation  
Response to Data Requests of  
Bureau of Technical Utility Services  
Dated February 28, 2019  
Docket No. A-2019-3007945

Q-1 Reference the Application, Paragraph 42. Please provide the average distance between supporting structures.

A-1 The average distance between supporting structures is approximately 1,175 feet.

[WITNESS: Frank J. Richardson, II]

PPL Electric Utilities Corporation  
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Q-2 Reference the Application, Attachment 1, Figure 1-2. Please provide a system map depicting other existing transmission facilities in addition to the Breinigsville-Alburtis 500 kV Transmission Line.

A-2 Please see attached Confidential CEII maps.

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- Q-3 Reference the Application, Attachment 1, Page 3. Please explain whether the cost allocation for the subject project would change depending on whether the project is categorized as immediate need or subject to competition.
- A-3 The cost allocation could change if the project becomes a baseline project. However, as indicated in the response to Q-6, PPL EU is not aware a specific process to reclassify a project from a supplemental project to a baseline project. Only baseline projects can be immediate need or open to competition. The PJM Open Access Transmission Tariff does not distinguish between an immediate need project or one subject to competition when determining a baseline project's cost allocation.

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Q-4 Reference the Application, Attachment 1, Section 4.0. Please provide independent verification from PJM as to whether the reliability solution falls within the immediate need category or if it would likely be placed in the competitive window.

A-4 PPL EU received the following response from PJM:

In late 2018, PJM confirmed the existence of a potential reliability violation in 2023, that is addressed by the S0864 project. At that time, PJM did not run any additional analysis to determine whether the violation would show up in any earlier years' analyses consistent with an immediate-need reliability project. An immediate-need reliability project is a project PJM has identified that must be addressed within three years or less.

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Q-5 Reference the Application, Attachment 1, Section 4.1. Please provide independent verification from PJM that if the remaining portion of supplemental project s0864 is removed from the RTEP, an N-1-1 violation is present that would necessitate a baseline reliability fix.

A-5 PPL EU received the following response from PJM:

PJM performed N-1-1 analysis without the 500 kV portion of the S0864 project and identified voltage violations on the Wescosville area. This suggests that a baseline project may be needed without the S0864 project.

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- Q-6 Reference the Application, Attachment 1, Section 4.1. Please explain the process to reclassify a project in the RTEP from a supplemental project to a baseline project.
- A-6 PPL EU is not aware of a formal process for reclassifying supplemental projects as baseline projects established in the protocols for the PJM Regional Transmission Expansion Plan (“RTEP”). It is PPL EU’s understanding that PJM does not normally plan baseline projects to address potential violations already addressed by existing supplemental projects. In this instance project S0846 resolves the reliability violation at issue.

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Q-7 Reference the Application, Attachment 1, Section 6.0. Please provide independent verification from PJM that a baseline reliability solution would be the same as PPL Electric's proposed solution in s0864.

A-7 PPL EU received the following response from PJM:

PJM has not made any determination at this time as to any potential baseline reliability solution to replace S0864.

**VERIFICATION**

I, FRANK J. RICHARDSON II, being the PJM & Federal Regulatory Policy Manager 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: March 14, 2019

Frank J. Richardson II