

**PPL Electric Utilities Corporation
Response to Data Requests of the
Bureau of Technical Utility Services
Dated May 17, 2019
Docket No. A-2019-3009112**

Q.1 Reference the Letter of Notification, Paragraph 13. Please provide a copy of the two assessments completed by DiGioia Gray and Associates.

A.1 Please see attachments TUS A-1A, TUS A-1B, TUS A-1C, and TUS A-1D.

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- Q.2 Reference the Letter of Notification, Paragraph 39. Please quantify the potential impacts on PPL Electric's SAIFI, SAIDI, and CAIDI levels.
- A.2 As previously stated in the Letter of Notification, the line is in poor condition and if not addressed it will ultimately fail. Transmission lines in poor condition must be addressed prior to entering failure mode. Once an asset exceeds its useful life and enters failure mode there is an immediate and sharp degradation in reliability performance and risk of failure increases substantially. PPL has proactively decided to rebuild the transmission lines based on the poor condition of the transmission line and not previous operational performance. If the line is not rebuilt these lines will have a significant impact on future SAIFI, SAIDI and CAIDI and customers will experience unnecessary additional outages and costs.

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- Q.3 Reference the Letter of Notification, Section II(A)(2)(a), Existing System. Please explain whether any of the loads served by the facilities proposed to be replaced are considered to be critical customers.
- A.3 There are two critical customers served from the Hauto-Siegfried #1 and #4 lines: the St. Luke's Miners' Memorial Hospital Acute Care Center and the Carbon County EMA 911 Center. Additionally, the lines in the Project interconnect to two 69kV facilities that serve a solar generation project: Pennsylvania Solar Park on the Hauto-Siegfried #1 and #4 lines, and Palmerton Zinc is served from the Siegfried-East Palmerton #1 and #2 lines.

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- Q.4 Reference the Letter of Notification, Attachment 1, Page 4. Please provide the approximate date construction will begin on the proposed project.
- A.4 PPL EU's Letter of Notification (LON) proposed to begin construction upon commission approval to meet a 2020 in-service date. Based upon the timing of previous LON submittals and subsequent Commission approvals, PPL plans on starting construction in August 2019. However, the exact start date is dependent on Commission approval relative to resource availability, outage availability and coordination with customers.

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- Q.5 Reference the Letter of Notification, Attachment 1, Section 4.3. Please explain whether conditions exist which may have accelerated aging or led to the premature failure of the facilities proposed to be replaced.
- A.5 As described within the Letter of Notification, Attachment 1, DiGioia Gray and Associates evaluated the condition of transmission lines. As noted in the report, these lines traverse through heavily industrialized areas which have accelerated the corrosion rate of the steel structures and associated hardware on the lines. The report also identified that many of the wood poles on this line are in severe condition due to being directly imbedded in marsh and wet environments.

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Q.6 Reference the Letter of Notification, Attachment 1, Section 5.2. Please provide a five-year history of maintenance expenses for the transmission facilities to be replaced as part of the proposed project.

A.6

Year	Maintenance Costs for Siegfried-East Palmerton #1 and #2 (Phase 2)	Maintenance Costs for Hauto-Siegfried #1 and #4 (Phase 1 and 3)
2014	0	\$0
2015	0	\$0
2016	\$23,292	\$0
2017	\$82,815	\$165,870
2018	\$297,250	\$0
Total	\$403,357	\$165,870

The five-year history of maintenance costs is provided above. As addressed in A.2, maintenance costs will significantly increase if the line is not replaced prior to entering failure mode.