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June 12, 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: Letter of Notification of PPL Electric Utilities Corporation for Approval to Site and Construct the Siegfried-East Palmerton #1 & #2 and Hauto-Siegfried #1 & #4 138/69 kV Transmission Lines in Lehigh and Carbon Counties, PA
Docket No. A-2019-3009112**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") are the Responses of PPL Electric to Data Requests of the Bureau of Technical Utility Services.

If there are any questions regarding the enclosed, please contact the undersigned. Thank you.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'JR Rogers', is written over the typed name 'Jessica R. Rogers'.

Enclosures

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Q-7 Reference the Letter of Notification, Paragraph 15. Please provide a detailed explanation as to why PPL Electric combined Phase 2 and Phase 3.

A-7 Although Phase 2 and 3 will be completed as separate construction phases, Phase 2 and 3 were filed as a single LON to provide the Commission with a holistic view of the remaining phases of this line rebuild project and minimize any administrative burdens to the Commission resulting from two concurrently filed LONs for the same project.

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Q-8 Reference the Letter of Notification, Paragraph 26. Please provide a separate quantified breakdown, including structure type, of the structures evaluated for the Hauto-Siegfried #1 & #4 138/69 kV Transmission Line and the Siegfried-East Palmerton #1 & #2 138/69 kV Transmission Line.

A-8 The requested breakdown is provided in the table below:

| Row Labels | Count of Structures |
|--------------------|---------------------|
| Lattice Tower | 60 |
| H-Frame with Steel | 6 |
| Steel Monopole | 20 |
| Wood H-Frame | 52 |
| Wood Monopole | 20 |
| Total | 158* |

*As stated in Letter of Notification at Paragraph 27, PPL Electric requested that 143 structures be evaluated to obtain a 90% confidence level that the results were representative (based on the total number of structures). However, PPL Electric ultimately decided that a 90% confidence level for each structure type was required (lattice tower, h-frame, steel monopole, wood h-frame and wood monopole). As such a total of 158 structures were evaluated.

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Q-9 Reference the Letter of Notification, Paragraph 77. The length of transmission line for which PPL Electric is currently seeking an exemption is not consistent with its previous filing at Docket No. A-2018-3001477. Please provide a detailed explanation of any differences between the section of the Siegfried-East Palmerton #1 and #2 138/69 kV Transmission Line for which PPL Electric previously sought an exemption and the section for which PPL Electric is currently seeking an exemption.

A-9 The section of the Siegfried-East Palmerton #1 and #2 138/69 kV Transmission Line for which PPL Electric seeks a waiver is the portion of the line that will be constructed on new right of way, and is the same section for which a waiver was previously sought. The length of the new transmission line to be installed on new right of way is approximately 0.35 miles. Reference to 0.3 and 0.4 miles were a result of inconsistent rounding of 0.35.

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Q-10 Reference the Letter of Notification, Paragraph 80. Please state the total length of exiting transmission line which will be consolidated from two parallel single-circuits to one double-circuit line.

A-10 The total length of the transmission line which will be consolidated from two parallel single-circuits to one double-circuit line is 19.2 miles (comprised of 4.0 miles in Phase 2 and 15.2 miles in Phase 3).

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Q-11 Reference the TUS Data Requests, Response to A-1, Attachment TUS A-1D, Section 5.2. Please provide a detailed explanation of the differences between the “reject criteria” used by PPL Electric and Osmose Utilities Services.

A-11 Osmose Utilities Services identifies a wood pole as a “reject” if they believe the pole cannot be remediated via fumigation or installation of a ground line pole truss. In addition, these remediation methods provide short term reliability benefits, but do not improve the overall structural integrity of the pole or inhibit any further damage from developing. PPL Electric identifies defects that are deemed a risk to the structural integrity of the pole and a risk of failure as drivers to reject and replace the pole.

VERIFICATION

I, DAVID A. QUIER being the DIRECTOR OF ASSET MANAGEMENT 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: 6/12/19


