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File #: 179790

March 12, 2020

**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

RECEIVED  
2019 MAR 12 PM 3:06  
PA PUC  
SECRETARY'S BUREAU  
FRONT DESK

**Re: Letter of Notification of PPL Electric Utilities Corporation, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to Relocate Approximately 0.64 Miles of the Hummelstown – Steelton 230 kV Transmission Line in Lower Swatara Township, Dauphin County, PA  
Docket No. A-2020-**

Dear Secretary Chiavetta:

Enclosed for filing is the Letter of Notification of PPL Electric Utilities Corporation in the above-referenced proceeding. A CD containing a copy of the Letter of Notification and Attachments in Support of the Letter of Notification is also enclosed.

As indicated on the Certificate of Service, copies of the Letter of Notification are being served by certified mail, return receipt requested, upon the involved governmental agencies and municipalities.

If you have any questions concerning this matter, please contact me at the address or telephone numbers provided above.

Enclosed please find our firm's check in the amount of \$350 representing the filing fee.

Rosemary Chiavetta, Secretary  
March 12, 2020  
Page 2

Respectfully submitted,

A handwritten signature in blue ink that reads "Jessica R. Rogers" followed by a stylized set of initials "JRB".

Jessica R. Rogers

JRR/kl  
Enclosures

cc: Certificate of Service  
Renardo Hicks  
Paul T. Diskin  
Kimberly Hafner  
Debra Backer  
Jordan Van Order

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification of PPL Electric :  
Utilities Corporation, Filed Pursuant to 52 :  
Pa. Code Chapter 57 Subchapter G, for : Docket No. A-2020-\_\_\_\_\_  
Approval to Relocate Approximately 0.64 :  
Miles of the Hummelstown – Steelton 230 :  
kV Transmission Line in Lower Swatara :  
Township, Dauphin County, Pennsylvania :  
:

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**LETTER OF NOTIFICATION**

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TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric”) hereby files, pursuant to 52 Pa. Code § 57.72(d), this Letter of Notification to request approval from the Pennsylvania Public Utility Commission (“Commission”) to relocate approximately 0.64 miles of the existing Hummelstown – Steelton 230 kV Transmission Line in Lower Swatara Township, Dauphin County, Pennsylvania (the “Project”). PPL Electric has provided information regarding this Project to Lower Swatara Township and Dauphin County, neither of which have objected to the Project.

The proposed Project is needed to accommodate the development of the United Parcel Service (“UPS”) property in the 2100 block of North Union Street, Middletown, PA 17057 by relocating 0.64 miles of the existing transmission line to the eastern perimeter of the site. Construction of the planned development cannot be completed until after the existing transmission line has been relocated. All costs associated with this relocation project will be paid by UPS. Subject to the Commission’s approval, construction of this Project is scheduled to occur

in October 2020 to support an in-service date of December 2020. In support thereof, PPL Electric states as follows:

**I. INTRODUCTION**

1. This Letter of Notification 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 PPL Electric Utilities Corporation, Two North Ninth Street, Allentown, Pennsylvania 18101.

3. PPL Electric's attorneys are:

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PPL Electric's attorneys are authorized to receive all notices and communications regarding this Letter of Notification.

4. 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.

5. PPL Electric owns approximately 5,300 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.

6. This Letter of Notification includes the following accompanying attachments:

- Attachment 1 Aerial Map of Existing Facilities.
- Attachment 2 Aerial Map of Proposed Relocated Facilities.
- Attachment 3 Depiction of the Type of H-Frames Used for this Project.
- Attachment 4 PPL Electric Design Criteria and Safety Practices.

7. This Letter of Notification and accompanying Attachments, which are incorporated herein by reference, contain all the information required by 52 Pa. Code § 57.72(d)(4).

## **II. THE PROJECT**

### **A. NEED FOR THE PROJECT**

8. UPS is planning to develop their property in PPL Electric's service territory in Lower Swatara Township, Dauphin County, Pennsylvania. The property is located in the 2100 block of North Union Street, Middletown, PA 17057.

9. UPS has commenced preliminary construction activities on the property.

10. The UPS property is currently traversed by a segment of PPL Electric's existing Hummelstown – Steelton 230 kV Transmission Line. The Hummelstown – Steelton 230 kV Transmission Line is a single-circuit 230 kV line. An aerial map depicting the current location of the existing facilities is provided in Attachment 1.

11. UPS has requested that the segment of PPL Electric's existing Hummelstown – Steelton 230 kV Transmission Line that currently traverses their property be relocated along the

eastern perimeter of the site to accommodate the development of the site. Importantly, UPS's construction cannot be completed until the existing transmission facilities are relocated.

12. UPS and PPL Electric have entered into an agreement dated December 9, 2019, setting forth the terms in which PPL Electric will relocate its facilities and UPS's obligation to pay for the costs of the relocation.

#### **B. THE PROPOSED PROJECT**

13. To accommodate the development of the UPS property, and at the request of UPS, PPL Electric has agreed to relocate an approximately 0.64-mile (approximately 3,398 linear feet) segment of the existing Hummelstown – Steelton 230 kV Transmission Line to the eastern perimeter of the UPS property.

14. The proposed route for the relocated facilities will be located entirely on the property owned by UPS. An aerial map depicting the proposed route is provided in Attachment 2.

15. To relocate the Hummelstown – Steelton 230 kV Transmission Line, PPL Electric proposes to remove four existing H-frame wood structures and one existing wooden three-pole angle structure from the UPS property and replace them with five steel H-frame structures to be located near the eastern property boundary. Each new structure will be installed on a concrete caisson foundation and will average 74 feet high.<sup>1</sup> An aerial map depicting the proposed location of the new facilities is provided in Attachment 2. A depiction of the type of H-frames used for this Project is provided in Attachment 3.

16. Approximately 3,000 feet of the existing single-circuit Hummelstown – Steelton 230 kV Transmission Line that currently traverses the site will be moved to the new steel H-

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<sup>1</sup> The average height of the existing structures on the property is 62 feet.

frame transmission structures to accommodate the proposed development. The relocated line will be approximately 3,400 feet in the new alignment as depicted in Attachment 2.

17. The existing single-circuit Hummelstown – Steelton 230 kV Transmission Line currently utilizes approximately 3,000 feet of 1,108.6 kcmil,<sup>2</sup> 24/13 stranding, ACAR<sup>3</sup> power conductors and approximately 3,000 feet of 7/16 inch EHS<sup>4</sup> aluminized steel shield wire. The relocated segment of the Hummelstown – Steelton 230 kV Transmission Line will utilize approximately 3,400 feet of 1,108.6 kcmil 24/13 stranding, ACAR power conductors and 3,398 feet of 0.752-inch fiber OPGW.<sup>5</sup>

18. The total estimated cost to design and construct the Project is approximately \$5,073,000.<sup>6</sup> The entire cost of the proposed relocation will be paid by UPS.<sup>7</sup>

19. Upon Commission approval, the overhead portion of the Project has a scheduled construction start date of October 2020 to meet an in-service date of December 2020.

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<sup>2</sup> Kcmil stands for thousand circular mills. Kcmil wire size is the equivalent cross sectional area in thousands of circular mils. A circular mil is the area of a circle with a diameter of one thousandth (.001) of an inch.

<sup>3</sup> ACAR stands for aluminum conductor alloy reinforced.

<sup>4</sup> EHS stands for extra high strength.

<sup>5</sup> OPGW stands for optical ground wire.

<sup>6</sup> The estimated cost for the proposed Project is an order-of-magnitude estimate developed using averages of recent costs for similar projects and without an in-depth analysis or field investigation. The estimated cost is subject to change as the constructability of the Project, sequence of construction, and other factors that may affect the cost are identified and analyzed as the Project progresses.

<sup>7</sup> PPL Electric will not relocate the existing Hummelstown – Steelton 230 kV Transmission Line if UPS does not complete its plans to develop the site. Per the terms of the UPS and PPL Electric agreement, UPS is responsible for all costs incurred by PPL Electric prior to UPS's decision to not proceed with its development project.

### **III. HEALTH AND SAFETY**

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

21. The Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electrical Safety Code (“NESC”) minimum standards and all applicable legal requirements.

22. The Project will conform to PPL Electric’s design criteria, construction standards, and safety practices, which are provided in Attachment 4.

23. Consistent with PPL Electric’s Magnetic Field Management Program, the relocated Hummelstown – Steelton 230 kV Transmission Line will exceed the NESC standards for ground clearance.

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

25. The airport nearest the proposed construction of the relocated segment of the Hummelstown – Steelton 230 kV Transmission Line is the Milton South Hershey Medical Center, which is a private heliport located approximately 4.3 miles southwest of the Project area. PPL Electric does not anticipate any interference with airport operations because of the distance from the Project area, the presence of existing electrical facilities in the Project area, the existing development surrounding the site, and the similar height of the new and existing structures. However, PPL Electric will file any required documentation with both the Federal Aviation Administration and the Pennsylvania Department of Transportation Bureau of Aviation.

#### **IV. DESCRIPTION OF THE RIGHT-OF-WAY**

26. The Project will require the relocation of approximately 0.64 miles of existing Hummelstown – Steelton 230 kV Transmission Line. As explained above, the Project will be located completely within the property owned by UPS.

27. Prior to construction of the proposed Project, UPS is required to grant PPL Electric a right-of-way and easement for the relocated segment of the Hummelstown – Steelton 230 kV Transmission Line. The right-of-way for the relocated segment will vary between 150 and 185 feet in width and be situated along the eastern edge of the property.

28. The route for the proposed relocation of the Hummelstown – Steelton 230 kV Transmission Line is presently unoccupied. Upon completion of the UPS development project, the right-of-way will consist of a combination of gravel and mowed grass.

29. Vegetation management practices are based on maintenance rights acquired, voltage of the line involved, proximity of trees to the facilities, and the species and condition of trees involved. The site to be developed currently consists of predominately mowed grass and planted shrubs/small trees. Two dilapidated buildings are presently located in the eastern portion of the site. As a result, limited vegetation management will be required for the construction of this Project. In areas where vegetation management is required to complete the transmission line relocation, PPL Electric will apply its “Specifications for Initial Clearing and Control of Vegetation On or Adjacent to Electric Line Right of Way Through Use of Herbicides, Mechanical and Hand Clearing Techniques” to mitigate any impacts.

30. The Project area contains no state lands, national parks, state parks, or local parks.

31. The Project will not traverse or affect any unique geological, scenic, or natural areas.

32. The Project will not affect any recreational areas or natural landmarks.

33. The Project will not cross or impact National Register of Historic Places (NRHP)-listed or eligible cultural resources. A cultural resource (Union Canal: Middletown to Reading) with an unevaluated NRHP status, an undetermined resource (Allegheny Path) and a not-eligible resource (Middletown and Hummelstown Railroad) are located within 0.5 mile of the Project site but are not crossed or impacted by the Project. PPL Electric will consult with the Pennsylvania State Historic Preservation Office (SHPO) to minimize any potential impacts on above-ground resources.

34. An archaeological resource, which has insufficient data necessary to determine eligibility for NRHP status, is located on the site. PPL Electric will consult with the SHPO during final design to ensure no impacts to archaeological resources occur.

35. UPS is developing its property as a distribution warehouse and PPL Electric's transmission line relocation will be completed in coordination with UPS's construction activities.

36. In conjunction with UPS, PPL Electric will obtain all necessary environmental permits. PPL Electric will comply with all of the terms and conditions placed on those permits.

37. PPL Electric's line relocation activities will be covered under the soil and sedimentation control permits to be obtained by UPS. UPS will be responsible for permit compliance; however, PPL Electric will follow any permit restrictions applicable to the line relocation activities.

38. PPL Electric conducted an online Pennsylvania Natural Diversity Inventory (PNDI) review on January 26, 2020. Based on the review, the Pennsylvania Game Commission (PGC) and the Pennsylvania Department of Conservation and Natural Resources (DCNR) indicated in their response that the Project is not likely to impact any threatened and endangered species or special concern species and resources located within the Project area. The

Pennsylvania Fish and Boat Commission (PFBC) response suggested maintaining a 100-foot buffer between the proposed Project area and any spring seeps, sinkholes and caves. No documented spring seeps, sinkholes or caves are located on the site. Therefore, it is anticipated that no further action is required. The U.S. Fish and Wildlife Service (USFWS) indicated that the Project area is located within proximity to a bald eagle nest. USFWS also indicated the “Bald Eagle Project Screening Form” must be completed and submitted to the appropriate federal or state permitting agencies. In an effort to minimize potential impact to bald eagles, PPL Electric plans to implement all measures identified on the USFWS Bald Eagle Project Screen Form. PPL Electric will also adhere to any further avoidance measures provided through additional coordination with the USFWS.

**V. NOTICE**

39. PPL Electric has provided information regarding the Project to representatives of the Lower Swatara Township and Dauphin County. These entities have not objected to the proposed Project.

40. Copies of this Letter of Notification will be served on the governmental agencies, municipalities, and other public entities in accordance with 52 Pa. Code § 57.72(d)(3).

**VI. LETTER OF NOTIFICATION**

41. PPL Electric is proceeding by means of a Letter of Notification, instead of a full Application, pursuant to the Commission’s regulations at 52 Pa. Code § 57.72(d)(1)(vi).

42. Section 57.72(d)(1)(vi) permits a Letter of Notification for an overhead high voltage transmission line having a proposed route of 2 miles or less. As explained above, the

overhead segment of the proposed route for the Hummelstown – Steelton 230 kV Transmission Line is approximately 0.64 miles.

43. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or deny this Letter of Notification. If the Commission approves this Letter of Notification, the proposed Project will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71, *et seq.*

## VII. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve siting and relocation of an approximately 0.64 mile segment of the Hummelstown – Steelton 230 kV Transmission Line in Lower Swatara Township, Dauphin County, Pennsylvania to accommodate property development as explained above and in the Attachments hereto.

Respectfully submitted,



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Date: March 12, 2020

Attorneys for PPL Electric Utilities Corporation

# ATTACHMENT 1

## Aerial Map of Existing Facilities



- Existing Structure
- Existing PPL Line To Be Relocated
- Existing PPL Transmission Line
- - - Municipality Boundary
- Parcel Boundary
- UPS Parcel Boundary

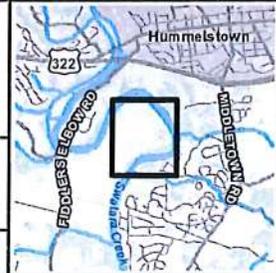
Imagery: PEMA 2018

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Coordinate System:  
State Plane PA South  
Datum: NAD 83

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January 31, 2020



HUMMELSTOWN - STEELTON 230 KV  
RELOCATION PROJECT

### Attachment 1 Existing Facilities



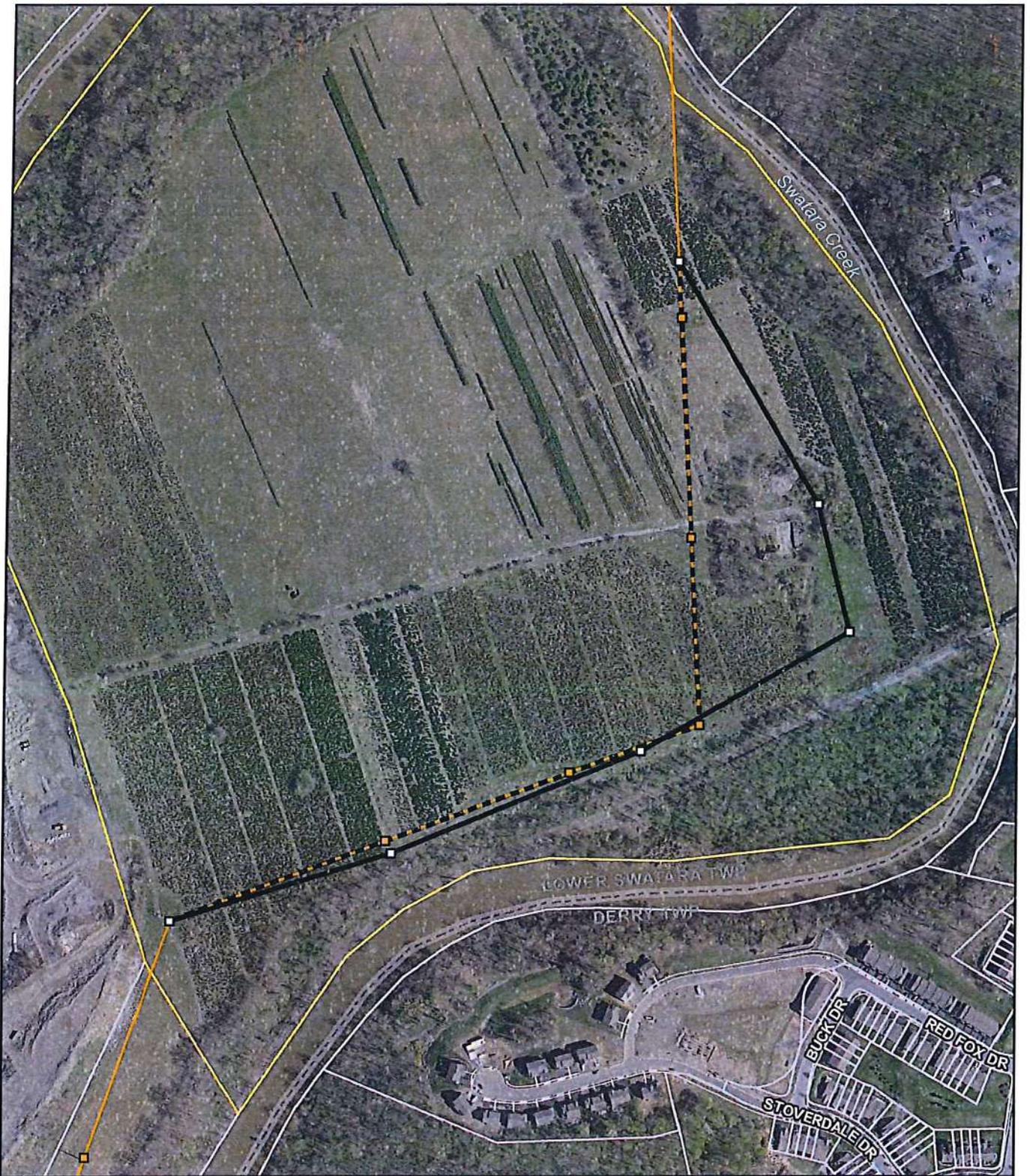

0      200      400

— Feet



## ATTACHMENT 2

### Aerial Map of Proposed Relocated Facilities



- Proposed Structure
- Relocated Line
- - Existing PPL Line To Be Removed
- Existing Structure
- Existing PPL Transmission Line
- - Municipality Boundary
- Parcel Boundary
- UPS Parcel Boundary

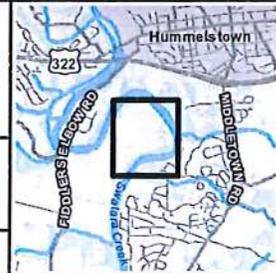
Imagery: PEMA 2018

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Coordinate System:  
State Plane PA South  
Datum: NAD 83

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February 06, 2020



HUMMELSTOWN - STEELTON 230 KV  
RELOCATION PROJECT  
**Attachment 2**  
**Proposed Relocated Facilities**




0    200    400

Feet



## ATTACHMENT 3

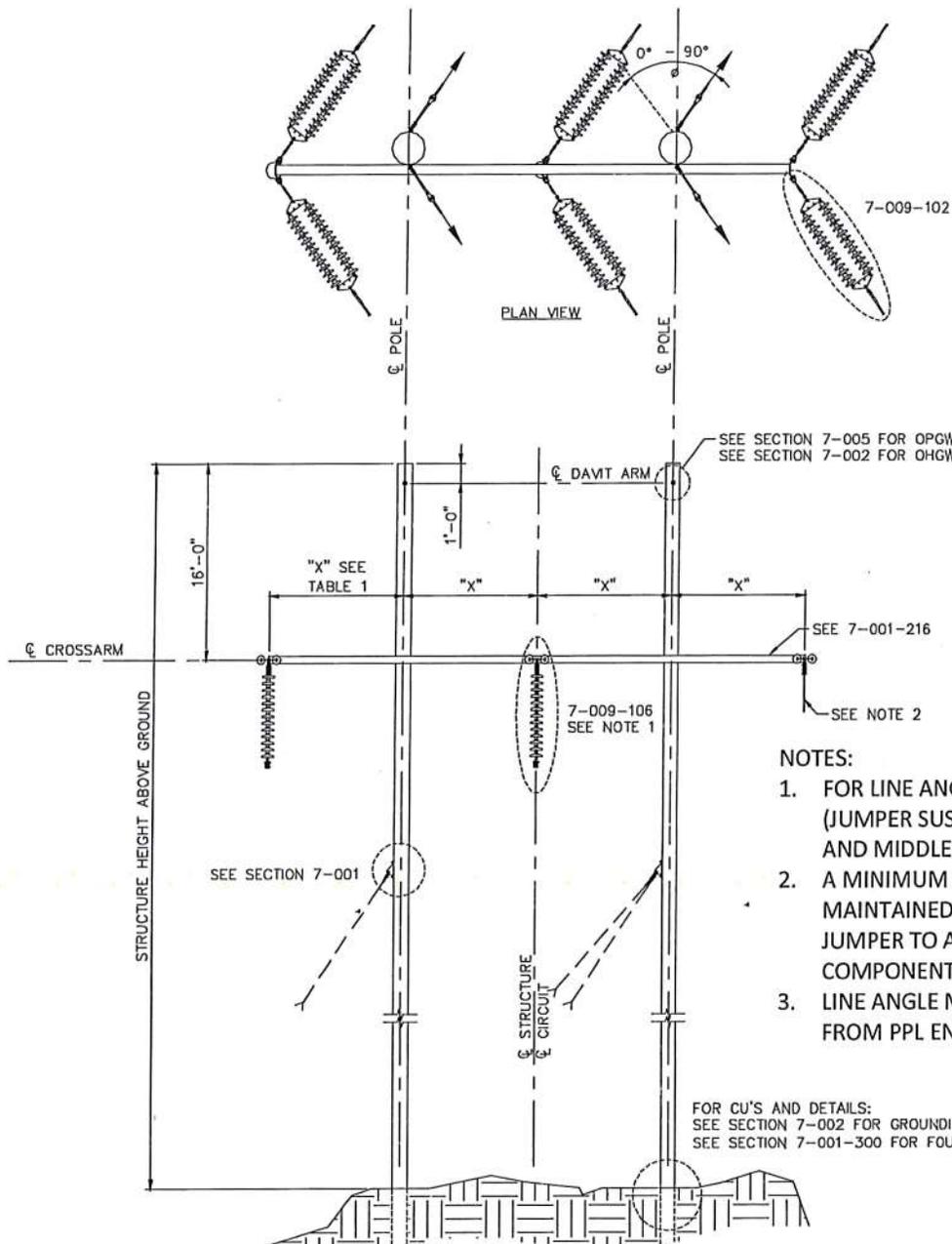
Depiction of the Type of H-Frames  
Used for This Project



**7-009-043**  
 230kV Single Circuit Steel H-Frame  
 0° to 90° Angle Tension Structure

Revision: 0  
 Effective Date: 3/18/2016  
 Sheet 1 of 1

LINE ANGLE	"X"
0°-30°	13'-0"
31°-60°	15'-0"
61°-90°	18'-0"



**NOTES:**

1. FOR LINE ANGLES OVER 10° INSTALL 7-009-106 (JUMPER SUSPENSION ASSEMBLY) ON OUTSIDE AND MIDDLE CIRCUITS.
2. A MINIMUM 74 3/4 INCH CLEARANCE SHALL BE MAINTAINED FROM ANY POINT ON THE JUMPER TO ANY GROUNDED STRUCTURAL COMPONENTS OR HARDWARE.
3. LINE ANGLE MAY EXCEED 90° WITH APPROVAL FROM PPL ENGINEERING/STANDARDS.

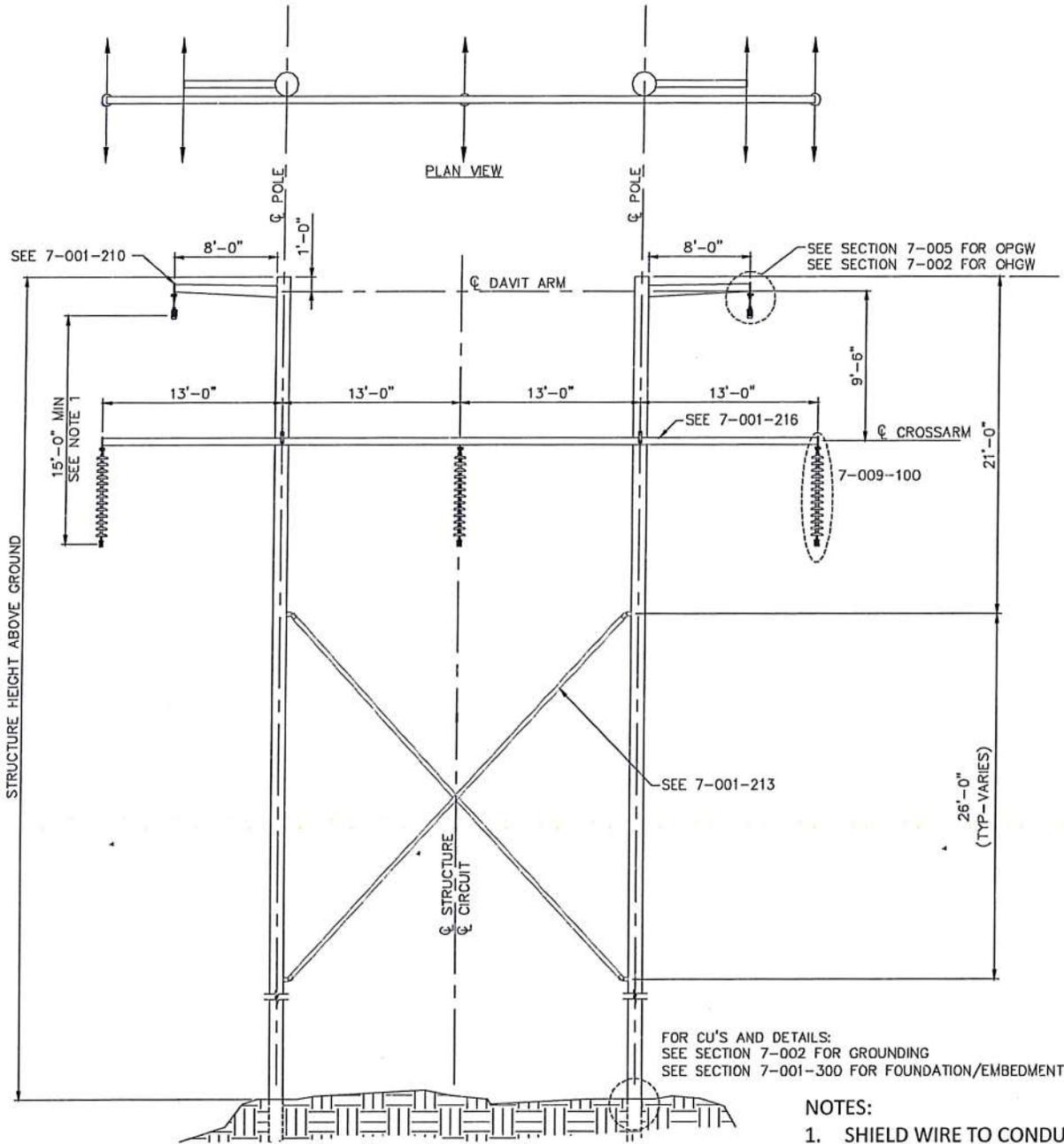
FOR CU'S AND DETAILS:  
 SEE SECTION 7-002 FOR GROUNDING  
 SEE SECTION 7-001-300 FOR FOUNDATION/EMBEDMENT

REV	Date	Sponsor	Reviewer	Transmission Construction Standards PPL Electric Utilities Corporation
0	3/18/16	MSD	SDS	Approved T. P. Hinson Manager Standards



**7-009-040**  
**230kV Single Circuit Steel H-Frame**  
**0° to 1° Suspension Structure**

Revision: 0  
 Effective Date: 3/18/2016  
 Sheet 1 of 1



- NOTES:**
- SHIELD WIRE TO CONDUCTOR SPACING VARIES DEPENDING ON SHIELD WIRE SUPPORT ASSEMBLY. SEE SPECIFIC JOB INSTRUCTIONS.

REV	Date	Sponsor	Reviewer	Transmission Construction Standards PPL Electric Utilities Corporation
0	3/18/16	MSD	SDS	
				Approved T. P. Hinson
				Manager Standards

## ATTACHMENT 4

# PPL ELECTRIC DESIGN CRITERIA AND SAFETY PRACTICES

## **TABLE OF CONTENTS**

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### **List of Tables**

Table 4-1: 69 kV Vertical Clearance to Ground

Table 4-2: 138 kV Vertical Clearance to Ground

Table 4-3: 230 kV Vertical Clearance to Ground

Table 4-4: 500 kV Vertical Clearance to Ground

## **1.0 DESIGN CONSIDERATIONS**

PPL Electric Utility Corporation’s (“PPL EU”) new and rebuilt transmission lines are designed according to, and generally exceed, all National Electric Safety Code (“NESC”) minimum standards. The NESC is a set of rules to safeguard people during the installation, operation, and maintenance of electric power lines. The NESC contains the basic provisions considered necessary for the safety of employees and the public. Although it is not intended as a design specification, its provisions establish minimum design requirements. PPL EU has developed design specifications and safety rules which meet or surpass all requirements specified by the NESC.

The NESC includes loading requirements and clearances for the design, construction, and operation of power lines. The "loads" on conductors and supporting structures are the mechanical forces that develop from the weight of the conductors, the weight of ice on the conductors, plus wind pressure on the conductors and supporting structures. Loading requirements are the loads on the conductors and structures that are anticipated assuming certain ice and wind conditions. Loading requirements always contain "safety factors" to allow for unknown or unanticipated contingencies. The clearances and loading requirements contained in the NESC are designed to maintain public safety.

PPL EU’s transmission line design standards meet or surpass the NESC clearances and loading requirements.

For example, the NESC specifies strength and loading rules based on three different “grades of construction” for conductors and supporting structures:

- Grade B – This grade of construction provides the highest margin of safety and is required when the pole supports spans that cross limited access highways, railroads, and waterways.
- Grade C – This grade of construction is most common and provides a basic margin of safety. It is often utilized for the typical power and joint-use distribution pole.
- Grade N – This is the lowest grade of construction and is most often used for emergency and temporary construction.

PPL EU designs all of its transmission lines for Grade B construction. The use of Grade B design and construction translates to higher levels of structural reliability and safety to withstand the environmental conditions of ice and/or wind loading, which provides a higher margin of safety.

Another example of PPL EU’s rigorous design standards are the parameters utilized to account for ice and wind loadings on the wires and structure. Structure loading and line designs must accommodate a variety of operating conditions as different ice and wind combinations can impact the conductor sags and tensions of the line. PPL EU’s transmission lines are designed to exceed NESC requirements by accounting for additional load cases due to various ice and wind loading conditions not required by NESC. This means that PPL EU lines are designed to operate safely and reliably during extreme inclement weather. In addition, PPL EU design standards include a clearance to ground buffer in excess of NESC required clearances to account for construction and design tolerances and the filling or grading of land within the right of way by property owners. This buffer also significantly reduces the risk of a property owner inadvertently contacting a transmission line. This has occurred on PPL’s system in the past and higher clearances minimize the likelihood of future occurrences.

**TABLE 4-1: 69 kV Vertical Clearance to Ground**

Surface Underneath Conductors	NESC Standard Clearance	PPL Conductor Clearances
Roads, streets, alleys	19.2 Ft.	22.2 Ft.
Other land traversed by vehicles (such as cultivated field, forest, etc.)	19.2 Ft.	22.2 Ft.
Spaces accessible to pedestrians only	15.2 Ft.	22.2 Ft.
Railroad tracks	27.2 Ft.	30.2 Ft.

**TABLE 4-2: 138 kV Vertical Clearance to Ground**

Surface Underneath Conductors	NESC Standard Clearance	PPL Conductor Clearances
Roads, streets, alleys	20.6 Ft.	23.6 Ft.
Other land traversed by vehicles (such as cultivated field, forest, etc.)	20.6 Ft.	23.6 Ft.
Spaces accessible to pedestrians only	16.6 Ft.	23.6 Ft.
Railroad tracks	28.6 Ft.	31.6 Ft.

**TABLE 4-3: 230 kV Vertical Clearance to Ground**

Surface Underneath Conductors	NESC Standard Clearance	PPL Conductor Clearances
Roads, streets, alleys	22.5 Ft.	25.5 Ft.
Other land traversed by vehicles (such as cultivated field, forest, etc.)	22.5 Ft.	25.5 Ft.
Spaces accessible to pedestrians only	18.5 Ft.	25.5 Ft.
Railroad tracks	30.5 Ft.	33.5 Ft.

**TABLE 4-4: 500 kV Vertical Clearance to Ground**

Surface Underneath Conductors	NESC Standard Clearance	PPL Conductor Clearances
Roads, streets, alleys	28.4 Ft.	31.4 Ft.
Other land traversed by vehicles (such as cultivated field, forest, etc.)	28.4 Ft.	31.4 Ft.
Spaces accessible to pedestrians only	24.4 Ft.	31.4 Ft.
Railroad tracks	36.4 Ft.	39.4 Ft.

A relay protection system is also used on PPL EU's transmission lines to protect the public safety, as well as the equipment on the transmission system. Relay protection is installed for all transmission lines to automatically de-energize the line in the unlikely event that the line or supporting structure fails and the line contacts the ground.

## **2.0 PERIODIC MAINTENANCE PROGRAM ON ALL TRANSMISSION LINES**

To ensure continued public safety and integrity of service, a periodic maintenance and inspection program is implemented for every transmission line. The program is administered through the use of helicopter patrols, with supplemental foot patrols as needed. Helicopter patrols are performed on all lines on a predetermined frequency, depending on voltage level. The two-man helicopter crew flies parallel and above the line so that the observer can look for signs of line damage or deterioration and observe clearances between vegetation and conductors. The observations are included in a report that is forwarded to the appropriate department for corrective action.

## **3.0 PERSONNEL SAFETY RULES**

Overall PPL EU designs and constructs projects with high regard for both public and employee safety, and follows or exceeds all codes and requirements. The following are a few, but not all, of the PPL EU safety rules that demonstrate the Company's dedication to employee and contractor safety:

- Work procedures have been developed to allow work to be performed on energized facilities in a safe manner. When lines or apparatus are removed from service to be worked on, the Energy Control Process system is applied. This system provides that a red tag must be physically placed on the control handle of the de-energized equipment.
- The red tag may be removed only after proper authorization to energize the equipment.
- Various other tags are used for limited operations and informational purposes.
- Employees or contractors will not apply or remove a tag or change the status of tagged equipment unless authorized.

- Temporary safety grounds are used on de-energized facilities for employee lineman safety during maintenance, construction, or reconstruction work. Safety grounds are wires connecting the de-energized facility to an electrical ground. If the facility should be energized, the safety grounds will divert the current directly to ground and reduce the likelihood of personal injury.
- Before applying grounds, a test is done to confirm that the line is de-energized. The voltage test device is checked before and after use to assure reliability.
- Poles or structures are inspected and examined for structural integrity before climbing. If there is any reason to believe that a pole is unsafe, it is stabilized before work is performed. Appropriate safety gear in the form of body belts, safety straps, hard hats, gloves, etc., is worn by linemen during line work activity.

#### **4.0 MAGNETIC FIELD MANAGEMENT PLAN**

PPL EU's Magnetic Field Management Program is applied to new and reconstructed transmission line projects. In order to lower magnetic field exposures, the program generally prescribes the use of a line design that provides ground clearances higher than the required minimum NESC ground clearance and reverse phasing of new double circuit lines where it is feasible to do so at low or no cost. The implementation of additional modifications to reduce magnetic field levels, are considered, provided those modifications can be made at low or no cost and will not interfere with the operation of the line.

## 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: 3/6/2020

  
\_\_\_\_\_  
David A. Quier

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **Letter of Notification** 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**

PA Department of Environmental Protection  
PO Box 2063  
Market Street State Office Building  
Harrisburg, PA 17105-2063  
Attn: Office of Field Operations

Pennsylvania Game Commission  
2001 Elmerton Avenue  
Harrisburg, PA 17110-9797  
Attn: John Taucher

PA Department of Environmental Protection  
Northeast Regional Office  
2 Public Square  
Wilkes-Barre, PA 18711 -0790

PA Fish and Boat Commission  
595 E. Rolling Ridge Drive  
Bellefonte, PA 16823-9620  
Attn: Christopher A. Urban

PA Department of Transportation  
Commonwealth Keystone Building  
400 North Street, 8th Floor  
Harrisburg, PA 17120  
Attn: Jason Sharp, Acting Chief Counsel

U.S. Army Corps of Engineers  
Baltimore District  
Regulatory Branch  
2 Hopkins Plaza  
Baltimore, MD 21201

PA Department of Transportation  
Engineering District 5  
1002 Hamilton Street  
Allentown, PA 18101

U.S. Fish and Wildlife Services  
Pennsylvania Field Office  
110 Radnor Road, Suite 101  
State College, PA 16801  
Attn: Lora Lattanzi

PA Historical and Museum Commission  
PA State Historic Preservation Office  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120-0053  
Attn: Mr. Douglas C. McLearn, Chief

Dauphin County Planning Commission  
112 Market Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17101  
Attn: Jerry Duke, Coordinator

PA Department of Conservation and  
Natural Resources  
Rachel Carson State Office Building  
PO Box 8767  
400 Market Street  
Harrisburg, PA 17105-8767  
Attn: Rebecca Bowen

Dauphin County Board of Commissioners  
112 Market Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17101  
Attn: Chris Abruzzo, Chairman

Dauphin County Planning Department  
112 Market Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17101  
Attn: Jerry Duke, Coordinator

Lower Swatara Township Planning  
Commission  
1499 Spring Garden Drive  
Middletown, PA 17057  
Attn: Chauncey D. Knopp, Chairman

Lower Swatara Township Board of  
Supervisors  
1499 Spring Garden Drive  
Middletown, PA 17057  
Attn: Jon G. Wilt, President

Lower Swatara Township  
1499 Spring Garden Drive  
Middletown, PA 17057  
Attn: Ann Hursh, Planning & Zoning  
Coordinator

Date: March 12, 2020

  
Jessica R. Rogers