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File #: 182179

March 11, 2021

***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 (i) the Reconstruction of the Montour-Milton 230 kV Transmission Line Located in Montour and Northumberland Counties, Pennsylvania, and (ii) the Rebuild of the Milton-Sunbury 230 kV Transmission Line Located in Snyder County, Pennsylvania, and (iii) Perform Additional Line Modifications in Connection with the Montour-Milton and Milton-Sunbury 230 kV Transmission Lines - Docket No. A-2021-3024033**

Dear Secretary Chiavetta:

Enclosed, on behalf of PPL Electric Utilities Corporation (“PPL Electric”), are the following responses to the Bureau of Technical Utility Services Data Requests, in the above-referenced proceeding:

Set I Nos. A-1 through A-8.

The documents provided as an Attachment in response to Set I, No. A-2 contain **PROPRIETARY** and **CONFIDENTIAL** information and will be provided separately via e-mail to Rosemary Chiavetta, Secretary for filing.

**REQUEST FOR CONFIDENTIAL TREATMENT  
OF PROPRIETY INFORMATION**

As noted above, the documents provided in the Attachment to the response to Set I, No. A-2 contain information which PPL Electric considers to be proprietary and confidential. PPL Electric requests that the copies of the materials that have been labeled “**CONFIDENTIAL**” be given

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confidential treatment by the Commission, including its various offices and bureaus. That is, PPL Electric requests that the confidential materials be excluded from the Commission's public document folder and that the confidential copies not be disclosed to the public.

If there are any questions concerning this matter, please contact me at the addresses or telephone numbers provided above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Garrett P. Lent". The signature is written in a cursive style with a large initial "G" and a long, sweeping tail.

Garrett P. Lent

GPL/jl  
Enclosures

cc: Jordan Van Order (*via e-mail only*)

**PPL Electric Utilities Corporation  
Response to the Data Request of  
The Bureau of Technical Utility Services  
Dated March 1, 2021  
Docket No. A-2021-3024033**

A-1                   Reference the Letter of Notification, Paragraph 11. Please explain whether the Milton-Millville 69 kV Transmission Line or Montour-Columbia 230 kV Transmission Line will also be rebuilt.

PPL                   The remaining portion of the Milton-Millville 69 kV transmission line  
Response           will be rebuilt as a separate project to address asset health concerns.  
The Montour-Columbia 230 kV is supported by COR-TEN® towers  
and is scheduled to be rebuilt in the future.

WITNESS: David A. Quier

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A-2 Reference the Letter of Notification, Paragraph 16. Please provide a copy of each engineering assessment.

PPL  
Response See **CONFIDENTIAL** Attachment A-2.

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A-3 Reference the Letter of Notification, Paragraphs 22 & 23. Please provide information regarding any unplanned outages on the subject transmission facilities over the previous five years, including the duration, cause, whether service to customers was interrupted by outages on the subject transmission lines, and if so, the number and type of customers which were impacted. Additionally, please explain whether the proposed project would mitigate the effects of these outages.

PPL Response For the time period of 2016-2020, there were no unplanned outages on the Sunbury-Milton 230kV line or the Montour-Milton 230kV line. There were 4 unplanned outages on the Sunbury-Milton 69kV line that runs on the same structures as the Sunbury-Milton 230kV line. The outage details are listed in the following table:

Outage ID	LINE	CAUSE	Customers Impacted?	# Distribution Customers Impacted	# Transmission Customers Impacted	MOMENTARY/ PERMANENT*	DURATION
7336-2019	SUNB-MILT 69kV	Vegetation	Yes	4018	0	PERMAMENT	8m 1s
5357-2018	SUNB-MILT 69kV	Vegetation	Yes	3995	0	PERMAMENT	18 hr 51 m
3773-2018	SUNB-MILT 69kV	Other utility/distributor equipment interference	Yes	4291	0	PERMAMENT	12h 18m 58s
8513-2016	SUNB-MILT 69kV	Lightning	Yes	3990	0	MOMENTARY	0s

\*Momentary is an outage lasting less than 5 minutes and permanent is an outage lasting more than 5 minutes.

The proposed Project would rebuild the subject lines in their entirety, including the circuit on the Sunbury – Milton 230 kV line that is presently operating at 69kV. Rebuilding these lines will improve the reliability to the customers served from those facilities and will practically eliminate future outages caused by vegetation and lightning.

WITNESS: David A. Quier

As stated in the Letter of Notification, the lines are in poor condition and if not addressed will ultimately fail. In addition, the effects of a failure of the Montour-Milton 230 kV Transmission Line are addressed in Paragraph 22,<sup>1</sup> and the effects of a failure of the Milton-Sunbury 230 kV Transmission line are addressed in Paragraph 23.<sup>2</sup> The decision to rebuild the transmission lines is based on the condition of the transmission lines and not previous operational performance. Transmission lines must be addressed prior to entering into failure mode. Customers will experience unnecessary additional outages and costs if PPL Electric allowed the transmission lines to enter failure mode before PPL Electric rebuilds the lines.

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<sup>1</sup> The third sentence of Paragraph 22 of the Letter of Notification should reference the "Loss of the Milton-Sunbury 230 kV Transmission Line," consistent with pages 12-13 of Attachment 1 to the Letter of Notification.

<sup>2</sup> The third sentence of Paragraph 23 of the Letter of Notification should reference the "Loss of the Montour-Milton 230 kV Transmission Line," consistent with page 13 of Attachment 1 to the Letter of Notification.

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A-4 Reference the Letter of Notification, Paragraph 27. Please explain whether the addition of generation in the area has contributed to the need to address the thermal violation. If so, please explain whether any of these generators are required to pay a portion of the proposed project.

PPL  
Response Under the current PJM Interconnection Queue rules existing generators are not required to pay any portion of the proposed Project costs. Therefore, no existing generators will be responsible to pay a portion of this Project.

The new generation in the area was studied after PPL Electric already proposed the supplemental project (s1106) to build a new 500-230 kV Catawissa substation in the area. As discussed in the Letter of Notification, the Catawissa substation was originally proposed to address the stability issue in the area. Addition of new generation along with other incremental changes to the system since the inclusion of the Catawissa project to the RTEP model in 2016 have contributed to this overload.

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A-5 Reference the Letter of Notification, Paragraph 30. Please explain why the proposed project is not a PJM baseline project.

PPL  
Response

PPL Electric originally proposed the Catawissa substation as a Supplemental Project to resolve stability concerns not addressed by PJM baseline criteria. Although there was no pre-existing thermal violation at the time when the Catawissa substation was proposed, addition of new generation along with other incremental changes to the system since the inclusion of the Catawissa project to the RTEP model in 2016 have contributed to this overload. These factors would result in the thermal violation identified in Paragraph 30 of the Letter of Notification if the proposed Project to rebuild the Montour-Milton-Sunbury path were to be removed from the model.

As described in Paragraph 29 of the Letter of Notification, subsequent analysis showed PPL Electric's stability concern could be met by the lower cost solution being proposed here. Importantly, even if the Catawissa substation was removed from the model and PJM identified a baseline need, PPL Electric would still have to address the existing COR-TEN® issues, which requires a rebuild of the Montour-Milton and Milton-Sunbury 230 kV transmission lines.

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A-6 Reference the Letter of Notification, Paragraph 36. Please quantify the potential impacts on PPL Electric's SAIFI, SAIDI, and CAIDI levels.

PPL  
Response This Project includes the rebuild of the Sunbury-Milton circuit that is operating at 69 kV and directly serves over 4,000 PPL distribution customers. Loss of both the Sunbury-Milton 230kV line and the Montour-Milton 230kV line would result in a 105 MW load drop and the loss of service to 14,000 customers. The likelihood of future outages on this line would be reduced, which would decrease potential customer outages and impacts to SAIFI, SAIDI and CAIDI metrics. The loss of only one of the 230kV sources would not result in immediate loss of service to customers, but would put Milton substation's load at risk for the next contingency.

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A-7                   Reference the Letter of Notification, Attachment, Section 1.0. Please explain whether a specific NERC or other regulatory standard is also driving the proposed project.

PPL  
Response

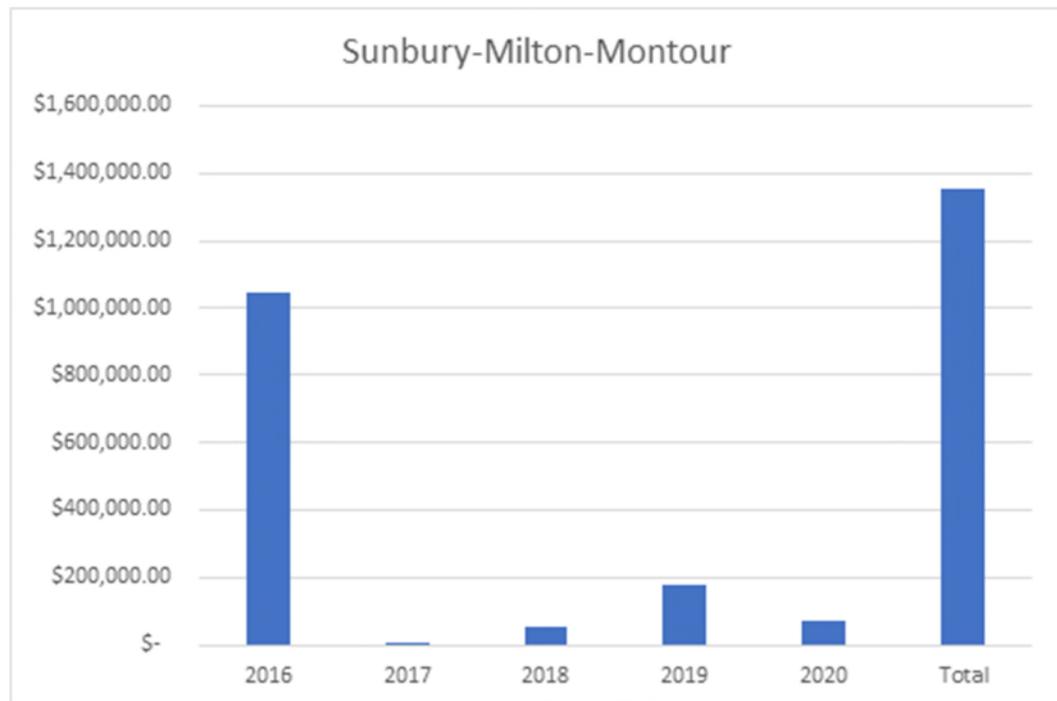
PPL interprets this question as referring to Attachment 1, Section 1.0.

The thermal violation on the Montour – Milton 230 kV path resulted from a Generator Deliverability analysis assessment, which is a type of thermal analysis conducted by PJM in the RTEP process described in Manual 14B. PJM's planning process, described in Manual 14B, complies with NERC TPL-001 requirements.

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A-8 Reference the Letter of Notification, Attachment 1, Section 4.2.1. Please provide a five-year history of maintenance expenses for the transmission facilities to be replaced as part of the proposed project.

PPL Response The 5-year maintenance expense history for these lines is displayed in the following chart and table:



	2016	2017	2018	2019	2020	Total
<b>Sunbury-Milton-Montour</b>	\$ 1,045,630.89	\$ 4,848.35	\$ 54,552.30	\$ 178,588.35	\$ 72,242.11	\$ 1,355,862.00

## 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: March 11, 2021

*David A Quier*  
[David A Quier \(Mar 11, 2021 10:04 EST\)](#)

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David A. Quier