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File #: 182179

June 28, 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 are the following responses to the Bureau of Technical Utility Services Data Requests, in the above-referenced proceeding:

Set II Nos. A-9 through A-15.

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

Respectfully submitted,



Garrett P. Lent

GPL/jl

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Enclosures

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

**PPL Electric Utilities Corporation
Response to the Data Requests of
The Bureau of Technical Utility Services
Dated June 17, 2021
Docket No. A-2021-3024033**

A-9 Reference the Letter of Notification. Please state the specific section of 52 Pa. Code § 57.72(d)(1) that PPL Electric believes is applicable.

PPL Response PPL Electric believes that 52 Pa. Code § 57.72(d)(1)(i) is applicable. See Letter of Notification paragraph 41-43, where PPL Electric explains that the Project will be constructed entirely within PPL Electric's existing transmission right-of-way and corridor, except for modifications to the existing alignment of the existing Milton-Millville 69 kV line ROW, which is limited to a two-mile section near the Montour Switchyard.¹

¹ Approval of the contemplated realignment and relocation of the 69 kV ROW is not being sought as a part of the Project, because the Commission's authority to regulate the location and construction of a "HV transmission line" is limited to transmission lines with a design voltage of greater than 100 kV. See 52 Pa. Code § 57.1 (defining "HV transmission line" or "HV line").

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A-10 Reference the Letter of Notification. Please explain why the reconstruction of the Montour-Milton 230 kV Transmission Line and Milton-Sunbury 230 kV Transmission Line have been combined in a single Letter of Notification.

PPL Response PPL Electric submitted to rebuild the entire 230 kV path from Montour to Milton to Sunbury substation under a single Letter of Notification because the entire path needs to double circuit in order to solve the stability and thermal violations as explained from paragraph 25 to 31 of the LON. For example, if the Montour to Milton 230 kV # 2 line was constructed without also constructing the Milton to Sunbury portion, under loss of the tower contingency referenced in paragraph 30 of the LON (the double circuit Saegers – Elimsport and Saegers – Clinton 230 kV line) the Milton – Sunbury 230 kV line would load to approximately 114% of its emergency rating.

Additionally, the Montour – Milton and Milton – Sunbury lines are both required in-service to ensure that a single N-1 line contingency would not cause loss of the Milton area load pocket as described in paragraph 22 of the LON. As such, PPL Electric determined that both line upgrades were addressing common needs.

Also refer to alternative solution presentation <https://www.pjm.com/-/media/committees-groups/committees/teac/2020/20200310/20200310-item-08-ppl-supplemental.ashx> given to PJM stakeholders in March, 2020. Slide 4 shows the solution to address the stability issue is to establish double circuit 230 kV line from Montour to Milton and from Milton to Sunbury substations.

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A-11 Reference the Letter of Notification, Paragraph 15. Please explain whether any manufacturer's warranty exists related to remediation of the COR-TEN lattice tower issues.

PPL
Response No manufacturer's warranty currently exists for remediation of the COR-TEN® lattice towers. After a reasonable investigation, PPL Electric is not aware of whether a manufacturer's warranty was in existence at the time the structures were installed.

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A-12 Reference the Letter of Notification, Paragraph 15. Please state the approximate quantity of COR-TEN lattice structures across PPL Electric's system that it anticipates will need remediation or replacement. Additionally, please provide the approximate associated cost.

PPL
Response There are approximately 236 miles circuit miles containing COR-TEN® lattice structures or approximately 1,284 structures across PPL Electric's transmission system that it currently anticipates will need to be addressed in order to resolve asset health concerns similar to those identified in the Letter of Notification. PPL Electric currently anticipates that addressing the currently anticipated projects associated with the 230 kV system (approx. 1112 of the identified structures) will cost approximately \$562 million in total; however, these estimates are preliminary in nature and subject to change. PPL Electric is also currently evaluating one other transmission line asset that includes 172 COR-TEN® lattice structures, but it has not yet developed a cost estimate for the remediation or replacement of these structures.

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A-13 Reference the Letter of Notification, Paragraph 20. Please provide the anticipated service life of the proposed new structures.

PPL
Response New steel structures that would be installed under the proposed project have an anticipated service life of 75 years.

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A-14 Reference the Letter of Notification, Paragraph 61. The location of the proposed project is not consistent with Attachment 1, Section 1.0. Please state the name of each municipality and corresponding county in which the proposed project will be located.

PPL Response The municipalities and counties crossed by the Montour-Milton-Sunbury COR-TEN® Rebuild Project include:

- Derry Township, Montour County
- Liberty Township, Montour County
- East Chillisquaque Township, Northumberland County
- West Chillisquaque Township, Northumberland County
- Point Township, Northumberland County
- Union Township, Union County
- Monroe Township, Snyder County
- Shamokin Dam Borough, Snyder County

These are consistent with the agency list that was provided for the Letter of Notification, see Attachment 6.

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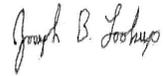
A-15 Reference the Letter of Notification, Attachment 1, Table 1-3. Please provide a detailed explanation as to why the 45-year cost of service is substantially greater than the \$89.9 million cost of the proposed project.

PPL
Response The \$89.9 million is the upfront cost of the proposed project, including design and construction. To evaluate total cost-of-service, the calculation must factor in all lifecycle costs associated with that asset over the analysis window (*i.e.*, 45 years). In the case of the proposed project, those lifecycle costs include 1) annual depreciation expense over the 45-year window, 2) annual Return on Capital over the 45-year window, and 3) O&M expense for minor repairs at year 45. Those costs will make up the total revenue requirement that is entered annually on the FERC Form 1 formula rate.

VERIFICATION

I, JOSEPH B. LOOKUP, 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: 06/28/2021



Joseph B. Lookup