

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, :
LLC Filed Pursuant to 52 Pa. Code :
Chapter 57, Subchapter G, for Approval of :
the Siting and Construction of the 230 kV :
Transmission Line Associated With the :
Independence Energy Connection-East :
Project in Portions of York County, :
Pennsylvania :

Docket No. **A-2017-2640195**

Application of Transource Pennsylvania, :
LLC Filed Pursuant to 52 Pa. Code :
Chapter 57, Subchapter G, for Approval of :
the Siting and Construction of the 230 kV :
Transmission Line Associated With the :
Independence Energy Connection-West :
Project in Portions of Franklin County, :
Pennsylvania :

Docket No. **A-2017-2640200**

**SURREBUTTAL TESTIMONY OF
SHADAB ALI**

PPL Electric Utilities Corporation

RECEIVED
FEB 26 2019
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PPL Statement "1"

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1 **Q. Please state your name and business address.**

2 A. My name is Shadab Ali. I am a Transmission Planning Supervisor for PPL Electric
3 Utilities ("PPL EU"). My business address is 2 North 9th Street, Allentown, PA 18101.

4 **Q. Have you previously provided Direct Testimony in this proceeding?**

5 A. No, I have not.

6 **Q. What are your responsibilities in that position?**

7 A. My group is responsible for performing various reliability and economic analyses on PPL
8 EU's bulk transmission system and developing mitigation plans in accordance with PPL
9 EU and PJM procedures.

10 **Q. Please describe the purpose of your Testimony.**

11 A. My Testimony responds to assertions concerning PPL's existing facilities and existing
12 right-of-ways as it relates to alternative projects considered for Project 9A addressed in
13 Direct Testimony of Witness Steven Herling on behalf of PJM Interconnection.

14 **Q. Are you sponsoring any exhibits with your Testimony?**

15 A. No.

16 **Q. PJM Witness Herling argues that alternatives to new Rights of Way using existing
17 PPL facilities or PPL right of way are not viable. Do you agree with Mr. Herling on
18 this point?**

19 A. No, I do not agree. Witness Herling testified that PJM evaluated new proposed second
20 circuits on Furnace Run - Conastone 230kV and Furnace Run – Graceton 230kV and
21 found that these alternatives could potentially violate NERC Reliability standards. It is

1 unclear exactly what PJM modeled here with regard to existing PPL EU-owned facilities
2 because "the Furnace Run – Conastone 230 kV circuit towers and the Furnace Run –
3 Graceton 230 kV circuit towers" are not PPL EU-owned facilities (and indeed have not
4 yet been constructed).

5 **Q. What facilities does PPL EU have in the area?**

6 A. Transource 9A proposes a new circuit from Furnace Run to Conastone. This parallels an
7 existing Otter Creek-Conastone 230 kV line jointly owned by PPL EU and BGE. The
8 PPL EU owned section of the line is designed to accommodate a second circuit without
9 acquiring new Right of Way. PPL EU's Otter Creek 230 kV substation is built next to the
10 TMI-Peach Bottom 500 kV line and can be connected to the line through 500-230 kV
11 transformers. Thus, adding 500-230 kV transformation at the existing Otter Creek
12 substation, adding a second high capacity 230 kV circuit and replacing the current circuit
13 with a higher capacity circuit on the existing Otter Creek-Conastone 230 kV line may
14 provide similar economic benefits as the proposed new Furnace Run substation and a
15 new double circuit line between Furnace Run and Conastone substation. Furthermore,
16 there is another PPL EU-BGE jointly owned line (Manor-Graceton 230 kV) in the area
17 that can be utilized to add a second 230 kV circuit from north to south.

18 **Q. Are there any other potential uses of PPL EU's facilities to solve the economic**
19 **project PJM identified?**

20 A. Yes. It does not appear that PJM considered other alternatives utilizing PPL EU's
21 facilities either. For example, it does not appear that PJM ever considered adding a new
22 500 kV circuit from the existing TMI-Peach Bottom 500 kV line (utilizing a new 500 kV
23 substation at Otter Creek) to the 500 kV Conastone substation, utilizing PPL EU owned
24 right of way on the Otter Creek- Conastone 230 kV line.

1 In fact, a new 500 kV circuit utilizing PPL EU's existing Right of Way between a new
2 Otter Creek 500 kV substation (to be built by expanding PPL EU Otter Creek 230 kV
3 substation) and the existing Conastone 500 kV substation will provide more capacity
4 than the total capacity of the proposed Transource 9A project, which only adds a new
5 double circuit 230 kV connection between the Furnace Run and Conastone substations.

6 **Q. Does this conclude your testimony?**

7 **A. Yes.**

VERIFICATION

I, SHADAB ALI, being a Transmission Planning Supervisor 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: 01/28/2019

Shadab Ali

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