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December 10, 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 The Rebuild Of The Elimsport-Lycoming #2 And #3 230 kV Transmission Lines Connecting The Elimsport 230 kV Substation And The Lycoming 230 kV Substation In Washington And Armstrong Township, And Williamsport Borough, Lycoming County, Pennsylvania
Docket No. A-2021-3029267**

Dear Secretary Chiavetta:

Enclosed for filing are the responses of PPL Electric Utilities Corporation to the data requests of The Bureau of Technical Utility Services.

Respectfully submitted,



Garrett P. Lent

GPL/dmc
Enclosures

cc: Jordan Van Order (*via email only*)

**PPL Electric Utilities Corporation
Response to the Data Request of
The Bureau of Technical Utility Services
Dated November 30, 2021
Docket No. A-2021-3029267**

A-1 Reference the Letter of Notification, Section 2. Please provide information related to any unplanned outages on the subject transmission facilities over the previous 5 years (or more), including the duration, cause, whether service to customers was interrupted by outages on the subject transmission line(s), and if so, the number and type of customers which were impacted. Additionally, explain whether the proposed project would mitigate the effects of these outages.

PPL Response For the time period of 2014-2021, there were 2 unplanned outages on the ElimSPORT-Lycoming #2 & #3 transmission lines. The outage details are listed in the following table:

Outage ID	LINE	CAUSE	Customers Impacted?	# Distribution Customers Impacted	# Transmission Customers Impacted	MOMENTARY/PERMANENT	Duration
4584-2018	ELIM-LYCO 3 230KV	Failed Protection System Equipment	No	0	0	PERMANENT	3h 37m 1s.
1289-2014	ELIM-LYCO 2 230KV	Foreign Interference	No	0	0	PERMANENT	4h 17m

The above outages did not result in customers being interrupted, however, rebuilding this line will improve reliability for the customers served from these facilities. As stated in the Letter of Notification, the lines are in poor condition and if not addressed will ultimately fail. The decision to rebuild the transmission line is based on the condition of the COR-TEN® towers and not previous operational performance. Transmission lines must be addressed prior to entering failure mode. Customers would 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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A-2 Reference the Letter of Notification, Paragraph 15. Please explain how the referenced report is applicable to the reconstruction of the Elimspport-Lycoming #2 & #3 Transmission Line.

PPL
Response The 2013 report was a system-wide assessment that provided general information related to the overall condition of COR-TEN® lattice tower structures on PPL Electric's Transmission System. 2013 was the first time PPL Electric identified COR-TEN® tower deterioration and that action needed to be taken to remediate structures. The Elimspport-Lycoming #2 & #3 transmission lines have the same COR-TEN® lattice tower structures that were studied and found to be deteriorating in the 2013 study. PPL Electric conducted more robust studies in 2019 and 2020 which confirmed that the Company was experiencing similar levels of deterioration on its COR-TEN® lattice towers across its service territory. Finally, as detailed in Paragraph 21 of the LON, PPL Electric studied the Elimspport-Lycoming #2 and #3 transmission line structures in 2021 and confirmed the existence and pack-out rust deterioration that was anticipated to be present as a result of the 2013, 2019 and 2020 studies.

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A-3 Reference the Letter of Notification, Paragraph 15. The number of structures is not consistent with Paragraph 14. Please reconcile.

PPL Paragraph 14 refers specifically to the number of COR-TEN® towers
Response supporting the Elimsport – Lycoming #2 and #3 Transmission Lines while Paragraph 15 refers to the total number of COR-TEN® towers that were inspected as part of the 2013 system-wide COR-TEN® assessment.

WITNESS: Joseph B. Lookup

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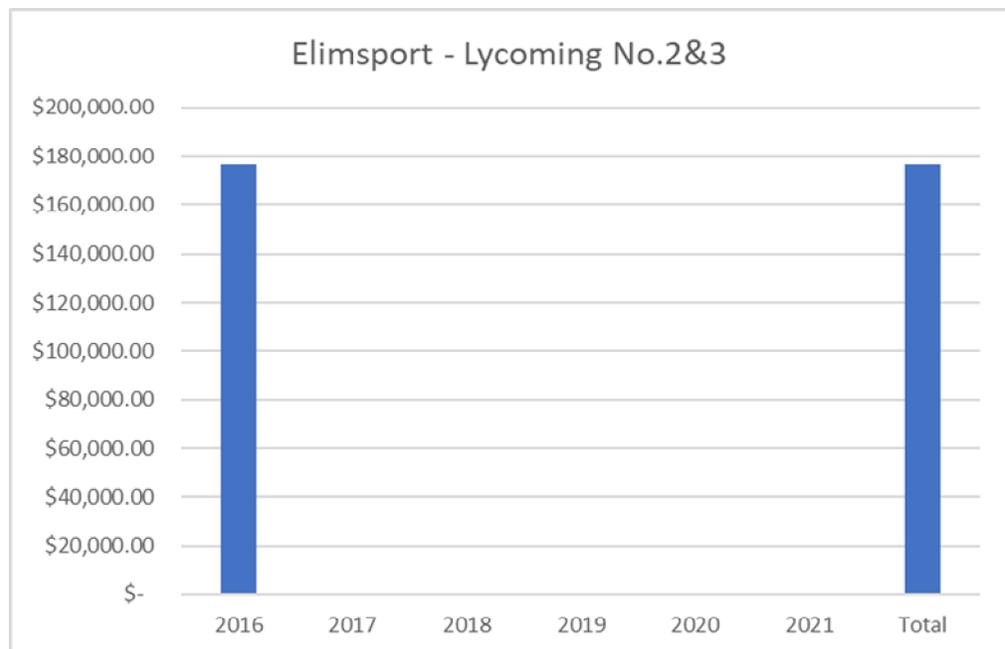
A-4 Reference the Letter of Notification, Paragraph 25. Please state the name of the individual or entity that will pay for the proposed project.

PPL As specified in the Letter of Notification, Attachment 1, Page 2, "The
Response total estimated cost of this project, as described below, is approximately
\$12.0 million, and the cost for the Project will be paid by PPL Electric."

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A-5 Reference the Letter of Notification, Attachment 1, Page 6. Please provide a five-year history of maintenance expenses for transmission facilities to be replaced as part of the proposed project.

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



	2016	2017	2018	2019	2020	2021	Total
Elimsport - Lycoming No. 2&3	\$ 176,510.04	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 176,510.04

Historic maintenance expenses are not a good predictor of what future maintenance costs will be if the Elimsport-Lycoming #2 and #3

WITNESS: Joseph B. Lookup

Transmission Line is not rebuilt. As explained in Attachment 1 to the LON, there are significant ongoing maintenance expenses associated with the structure replacement and structure remediation options. It is reasonable to anticipate that the ongoing maintenance costs will increase over time given that the structures are past their useful life and the current condition of structures as detailed in the 3rd party inspection reports. These maintenance expenses are largely eliminated under the Company's preferred solution of a full rebuild of the Elimsport-Lycoming #2 and #3 Transmission Line.

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: 12/08/2021


Joseph B. Lookup (Dec 8, 2021 16:49 EST)
Joseph B. Lookup