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January 7, 2022

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 Double-Circuit Manor-Millwood 230 kV/Face Rock-Millwood 69 kV Transmission Lines Connecting The Manor 230-69 kV Substation And The Millwood 230-69 kV Substation In Conestoga Township, Manor Township, And Pequea Township, Lancaster County, Pennsylvania
Docket No. A 2021-3029689**

Dear Secretary Chiavetta:

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

Respectfully submitted,



Garrett P. Lent

GPL/dmc
Enclosures

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

**PPL Electric Utilities Corporation
Response to the Data Request of
The Bureau of Technical Utility Services
Dated December 28, 2021
Docket No. A-2021-3029689**

A-1 Reference the Letter of Notification. Please provide the statement required by 52 Pa. Code § 57.72(d)(iv).

PPL

Response As indicated on Letter of Notification page 1, PPL Electric filed this Letter of Notification pursuant to 52 Pa. Code § 57.72(d)(1)(i), as this project is proposed to be located entirely on an existing transmission line right-of-way, so long as the size, character design or configuration of the proposed HV line does not substantially alter the right-of-way. See *also* Letter of Notification ¶ 33. Furthermore, as demonstrated in Attachment 2, Table 2-1, the number of structures located in the existing ROW will not change, and the height of the structures will not substantially change. In addition, the proposed monopole structures will be constructed in generally the same location as the existing lattice towers. Attachment 2, p. 3.

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A-2 Reference the Letter of Notification, Paragraph 8. Please provide information regarding 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, 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

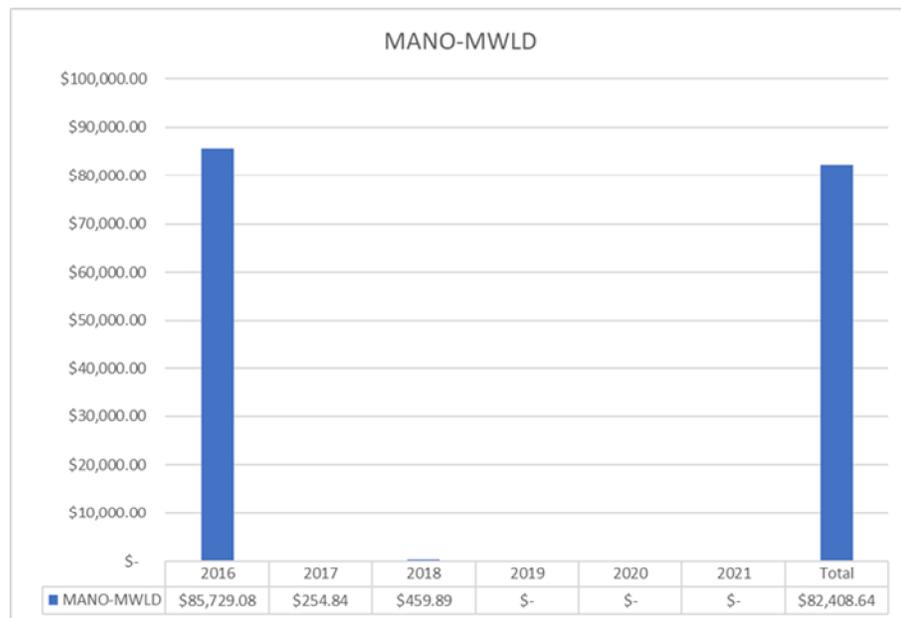
MANO-MLWD Outages since 2013			
Year	Cause	MOM/PER	Customers Affected
2021	Failed Protection System Equipment	MOM	0
2014	Human Error	MOM	0

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. The Bulk Electric System would experience unnecessary additional outages and customers would experience additional maintenance costs if PPL Electric allowed the transmission lines to enter failure mode before PPL Electric rebuilds the lines.

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A-3 Reference the Letter of Notification, Paragraph 15. Please provide a five-year history of maintenance expenses for transmission facilities to be replaced as part of the proposed project.

PPL
Response



Historic maintenance expenses are not a good predictor of what future maintenance costs will be if the Manor-Millwood 230kV 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 PPL Electric's preferred solution of a full rebuild of the Manor-Millwood 230kV Transmission Line.

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A-4 Reference the Letter of Notification, Paragraph 22. Please state the number of critical customers served by the facilities to be replaced under the subject project.

PPL
Response While there are no critical customers directly fed off the Manor-Millwood 230kV Transmission Line, Manor and Millwood Substations feed a total of 23,522 customers. Furthermore, the line is needed for the reliable operation of the Bulk Electric System. As explained in paragraph 22 of the LON, without this line there would be thermal overload and voltage magnitude violation for the loss of another facility.

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A-5 Reference the Letter of Notification, Paragraph 28. Please quantify the anticipated increase in reliability in terms of customer average interruption duration index, system average interruption duration index, and system average interruption frequency index.

PPL
Response In general, 230kV Bulk Electric System lines do not have a direct contribution to traditional IEEE 1366 metrics (SAIFI, SAIDI and CAIDI) since a single line outage should not cause customer outages. The 5-year history on this line has no contribution to those metrics and it should remain that way after completion of the rebuild. However 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 or future operational performance or its impact on customer outages. Transmission lines must be addressed prior to entering failure mode. The Bulk Electric System would experience unnecessary additional outages and customers would experience additional maintenance costs if PPL Electric allowed the transmission lines to enter failure mode before PPL Electric rebuilds the lines.

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A-6 Reference the Letter of Notification, Attachment 1, page 2. Please explain why PPL Electric is filing the Letter of Notification over a year prior to the estimated construction start date.

PPL
Response PPL Electrical Utilities is submitting the Letter of Notification in our schedule at a point in time that will allow the Company to maintain our planned construction schedule and, in the end, complete our scheduled in-service requirement. PPL Electric's schedule accounts for long lead material timelines, additional detailed engineering activities, construction competitive bidding that all will be required to be completed prior to construction start.

It also should be noted that the Company has had to increase material procurement durations and shipping durations based on industry and national supply chain delays on certain materials.

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: 01/07/2022


Joseph B. Lookup (Jan 7, 2022 08:22 EST)
Joseph B. Lookup