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January 11, 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 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 dated December 30, 2021.

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 December 30, 2021
Docket No. A-2021-3029267**

A-7 Reference the Letter of Notification. Please provide the statement required by 52 Pa. Code § 57.72(d)(4)(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 ¶ 32. 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. 2.

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A-8 Reference the Letter of Notification, Paragraph 25. Please explain why the subject project shares the same supplemental project number as PPL Electric's Manor-Millwood Project.

PPL Response Per the Elimsport-Lycoming Letter of Notification, Paragraph 25, the transmission line rebuild will be completed under supplemental project number s2364. Per the Manor-Millwood Letter of Notification, Paragraph 25, the transmission line rebuild will be completed under supplemental project number s2365.

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A-9 Reference the Letter of Notification, Paragraph 27. Please provide a detailed explanation of the generator stability and thermal violation needs.

PPL
Response As explained in the Letter of Notification, Paragraphs 14 through 22, the subject project is required to resolve the significant health concerns with the existing COR-TEN® steel lattice structures. It doesn't address any known generator stability and thermal violations needs. However, as explained in the Letter of Notification, Paragraphs 22 through 24, the Elimsport-Lycoming 230 kV Transmission Line is required to serve 313 MW load and 50,734 customers in the Lycoming and Lockhaven areas.

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A-10 Reference TUS Data Requests, Response to A-1 and Letter of Notification, Attachment 1, page 10. Please explain why PPL Electric is prioritizing the subject project over other projects which may realize greater benefits in terms of reliability indices.

PPL
Response

PPL Electric must plan system upgrades based on a variety of factors including improvements in reliability indices performance, but also other factors such as maintaining structures and equipment in a safe manner consistent with good utility practice. The proposed rebuild of the Elimsport-Lycoming #2 and #3 230 kV Transmission Lines will result in modest improvements to reliability indices performance, something which is true for many transmission projects. However, as was explained in the LON the project was designed to address the safety risk associated with replacing assets that have reached the end of usual life prior to those assets failing.

PPL Electric must also consider outage and operational limitations in coordination with on-going and planned work on the system to maintain the Company's reliability standards. The Elimsport-Lycoming #2 and #3 230 kV Transmission Lines share the same corridor with the redundant 230 kV feeds to the Lycoming Substation creating an operation limitation that could impact 50,734 customers. With the condition of the Elimsport-Lycoming #2 and #3 230 kV structure health and the physical limitations of this corridor Elimsport-Lycoming #2 and #3 230 kV Transmission Lines were prioritized.

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 21:44 EST)
Joseph B. Lookup