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August 19, 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 (1) A Section Of The Double-Circuit Saegers-Elmsport/Clinton-Elmsport 230 kV Transmission Lines Connecting The Elmsport 230 kV Substation To The Clinton 230 kV Substation And (2) The Saegers-Elmsport/Saegers-Clinton 230 kV Transmission Lines Connecting The Clinton 230 kV Substation To The Saegers 230 kV Substation In Lycoming County, Pennsylvania  
Docket No. A-2022-3034224**

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Dear Secretary Chiavetta:

Enclosed, on behalf of PPL Electric Utilities Corporation (“PPL Electric”), is information being supplied to the Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Technical Utility Services (“TUS”) in response to TUS Set I Data Requests regarding the above-captioned. PPL Electric’s responses to these data requests include the following **CONFIDENTIAL** and **PROPRIETARY** attachments.

**CONFIDENTIAL** Attachment TUS-1-3a

**CONFIDENTIAL** Attachment TUS-1-3b

Each of these attachments contain **CONFIDENTIAL** and **PROPRIETARY** information, and are being filed separately with the Commission via ShareFile.

Rosemary Chiavetta, Secretary  
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**REQUEST FOR CONFIDENTIAL TREATMENT  
OF PROPRIETY INFORMATION**

Each of the enclosures are marked “**CONFIDENTIAL AND PROPRIETARY**” because they contain commercially sensitive information, including, but not limited to, details about the condition of existing PPL Electric transmission structures and analysis of the same. PPL Electric requests that the copies of the materials that have been labeled “**CONFIDENTIAL AND PROPRIETARY**” be given confidential treatment by the Commission, including its various offices and bureaus. That is, PPL Electric requests that the confidential materials be excluded from the Commission’s public document folder and that the confidential copies not be disclosed to the public.

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

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Garrett P. Lent".

Garrett P. Lent

GPL/dmc  
Enclosures

cc: Jordan Van Order, Esquire

**PPL Electric Utilities Corporation  
Response to Data Request of the  
Bureau of Technical Utility Services  
Dated August 9, 2022  
Docket No. A-2022-3034224**

Q.1 Reference the Letter of Notification, Page 2. Please explain why PPL Electric is filing the Letter of Notification approximately 11 months prior to the construction date. Additionally, please provide the approximate date by which PPL Electric is seeking the Commission's decision.

A.1 PPL Electric 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 we have had to increase material procurement durations and shipping durations based on industry and national supply chain delays on certain materials.

PPL Electric is seeking the Commission's decision by no later than March 2023 so that if approval is granted, the Company has sufficient time to finalize the items listed above.

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Q.2 Reference the Letter of Notification, Paragraph 18. Please explain whether the assessment included structures to be replaced under the proposed project. If not, please provide a detailed explanation as to the relevance of the 2013 assessment on the proposed project.

A.2 The assessment referenced in Paragraph 18 does not include all structures to be replaced under the proposed project. Rather, the Company references the 2013 assessment to provide the Commission with a full understanding of the testing PPL Electric performed on its entire 230 kV system to ascertain the full scope of the pack-out rust issue. The May 2022 study referenced in Paragraph 23 includes an assessment of every structure on the Saegers-Elimsport 230 kV Transmission Lines.

WITNESS: Joseph B. Lookup

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Q.3 Reference the Letter of Notification, Paragraph 23, first sentence.  
Please provide a copy of the RTR Assessment contracted in May 2022.

A.3 See CONFIDENTIAL Attachment TUS-I-3.

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Q.4 Reference the Letter of Notification, Paragraph 23. Please provide a copy of the RTR September 2021 Assessment.

A.4 See CONFIDENTIAL Attachment TUS 1-3. The May 2022 is the revised version of the September 2021 report referenced in Paragraph 23. The May 2022 revisions included:

1. Structure 24796S37804 was added to the report;
2. Structure 24720S37773 was added to the report; and
3. Incorrect Grid#22319N2733823 was removed as this was a typo and a duplicate of 22319N27338.

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Q.5 Reference the Letter of Notification, Paragraph 29. The stated cost is not consistent with the cost stated on PJM Interconnection, LLC's Project Status & Cost Allocation page. Please explain.

A.5 The estimated cost stated on PJM Interconnection, LLC's Project Status & Cost Allocation was developed using historical and current market pricing for similar projects, activities, and material needed without an in-depth field investigation and design. The cost is subject to change as the constructability of the Project, sequence of construction, and other factors may affect costs as the Project progresses. In this instance it is inflation and increased cost of materials and shipping that is driving project costs higher.

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Q.6 Reference the Letter of Notification, Paragraph 31. Please quantify the anticipated increase in reliability in terms of customer average interruption duration index, system average interruption duration index, and system average frequency index.

A.6 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.

WITNESS: Joseph B. Lookup

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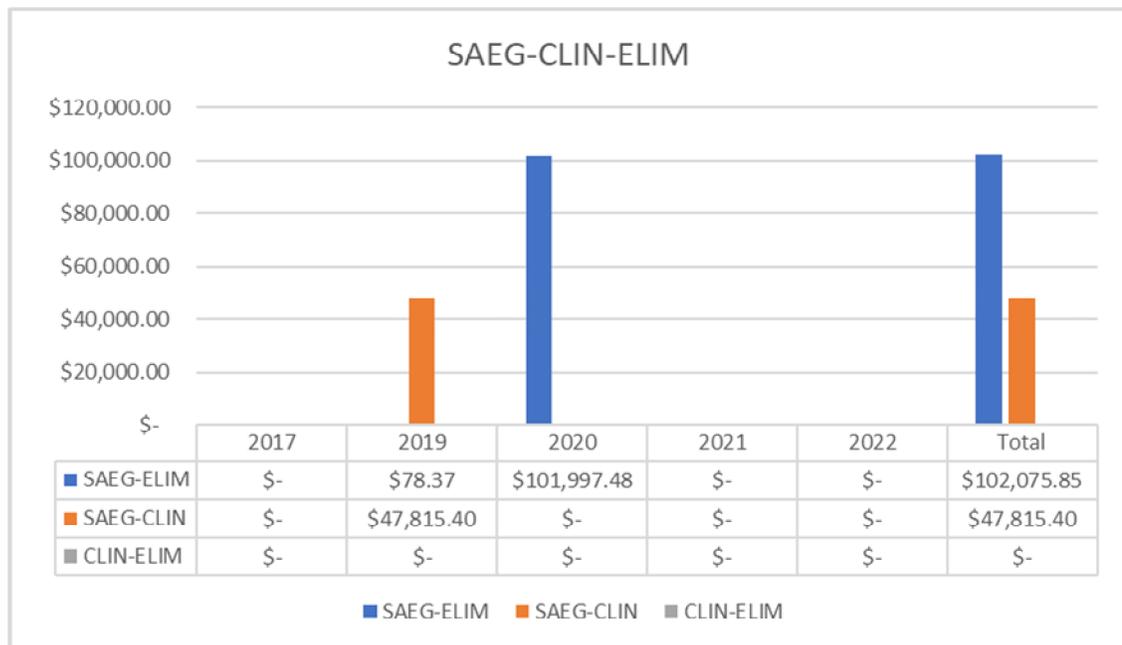
Q.7 Reference the Letter of Notification, Section VII. Please provide an updated page with the statement required by 52 Pa. Code § 57.72(d)(4)(iv).

A.7 See Attachment TUS-I-7.

**PPL Electric Utilities Corporation  
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Q.8 Reference the Letter of Notification. Please provide a five-year history of maintenance expenses for transmission facilities to be replaced as part of the proposed project.

A.8



Historic maintenance expenses are not a good predictor of what future maintenance costs will be if the Saegers-Elimsport 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 3<sup>rd</sup> party inspection reports. These maintenance expenses are largely eliminated under PPL Electric’s preferred solution of a full rebuild of the Saegers-Elimsport 230kV Transmission Line.

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Q.9 Reference the Letter of Notification. 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.

A.9

Outages Since 2013				
Line	Year	Cause	MOM/PER	Customers Affected
Clinton-ElimSPORT	2014	Human Error - Relay Settings	MOM	0
Saegers-ElimSPORT	2018	Lightning	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 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.

# Attachment TUS-1-7

230 kV Transmission Lines. Copies of the Letter of Notification will be served upon landowners in accordance with 52 Pa. Code § 57.72(d)(3). A list of the landowners impacted by this project is provided in Attachment 5.

59. PPL Electric has provided information regarding the Project to representatives of Brady Township, Clinton Township and Washington Township, all in Lycoming County, Pennsylvania. These entities have not objected to the proposed Project. Copies of this Letter of Notification will be served on the governmental agencies, municipalities, and other public entities and organizations in accordance with 52 Pa. Code § 57.72(d)(3). A list of these entities and organizations is also provided in Attachment 5.

## **VII. LETTER OF NOTIFICATION**

60. PPL Electric is proceeding by means of a Letter of Notification, instead of a full Application, pursuant to the Commission's regulations at 52 Pa. Code § 57.72(d)(1)(i).

61. The proposed Saegers-Elimsport Project qualifies for use of a Letter of Notification because it will be located entirely on an existing transmission line right-of-way, and the size, character design or configuration of the proposed transmission line will not substantially alter the right-of-way.

62. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the Saegers-Elimsport Project will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71, *et seq.*

**VIII. CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve the proposed Saegers-Elimsport Project located in Brady Township, Clinton Township and Washington Township, in Lycoming County, Pennsylvania that is explained above and in the Attachments hereto.

Respectfully submitted,

Michael J. Shafer (I.D. # 205681)  
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Date: August 2, 2022

Attorneys for PPL Electric Utilities Corporation