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File #: 197372

September 12, 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 Existing Double-Circuit South Akron-Milwood 230 kV / South Akron-Earl 69 kV / Millwood-Engleside 69 kV / Millwood-Strasburg 69 kV Transmission Lines Connecting The South Akron 230-69 kV Substation To The Milwood 230-69 kV Substation In East Lampeter Township, Pequea Township, Upper Leacock Township, West Earl Township, And West Lampeter Township All In Lancaster County, Pennsylvania
Docket No. A-2022-3034794**

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 proceeding. PPL Electric’s responses to these data requests include the following **CONFIDENTIAL** and **PROPRIETARY** attachments.

- **CONFIDENTIAL** Attachment TUS-I-1

This attachment contains **CONFIDENTIAL** and **PROPRIETARY** information, and is being filed separately with the Commission via ShareFile.


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**REQUEST FOR CONFIDENTIAL TREATMENT
OF PROPRIETY INFORMATION**

The enclosure is marked “**CONFIDENTIAL AND PROPRIETARY**” because it contains 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 copy of the material 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 material be excluded from the Commission’s public document folder and that the confidential copy 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 (*via email only*)

PPL Electric Utilities Corporation
Responses to the Set I Data Requests of
The Bureau of Technical Utility Services
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A-1 Reference the Letter of Notification, Paragraph 22. Please provide a copy of the assessment prepared by RTR Solutions in April 2022.

***Response:** Please see CONFIDENTIAL Attachment TUS-I-1.*

Witness: Joseph B. Lookup

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A-2 Reference the Letter of Notification, Paragraph 25. Please state the number of critical customers served by the facilities to be replaced under the subject project.

***Response:** There are two critical customers served by the facilities to be replaced under the subject project including the Willow Valley Retirement Community at Providence Park and the Willow Valley Retirement Community at Campus North.*

Witness: Joseph B. Lookup

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A-3 Reference the Letter of Notification, Paragraph 29. Please explain whether PPL Electric will replace the conductors along the entire length of the proposed project.

***Response:** Where the line is presently double circuit PPL Electric will be rebuilding it with two circuits and both circuits will have 230 kV conductor (1590 kcmil). Where the line is presently single circuit (8-miles in the middle from structure no. 33 through 82) PPL Electric is going to rebuild this segment to be designed to accommodate a second set of arms and conductors, but the second set of arms and conductors will be added in the future if needed, as described on page 5 of Attachment 1.*

Witness: Joseph B. Lookup

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- A-4 Reference the Letter of Notification, Paragraph 30. 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.

***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.*

Witness: Joseph B. Lookup

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A-5 Reference the Letter of Notification, Attachment 1, page 2. 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.

Response:

South Akron-Millwood Outages since 2013			
Year	Cause	MOM/PER	Customers Affected
2016	Failed AC Circuit Equipment - Insulator	MOM	0
2018	Failed AC Substation Equipment	PER	0
2020	Lightning	MOM	0

South Akron-Earl Outages since 2013			
Year	Cause	MOM/PER	Customers Affected
2013	Unknown	MOM	0
2014	Lightning	MOM	0
2014	Lightning	MOM	0
2014	Vegetation	MOM	0
2015	Lightning	MOM	0
2016	Lightning	MOM	0

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2019	Unknown	MOM	0
2021	Foreign Interference - Animal	MOM	5766

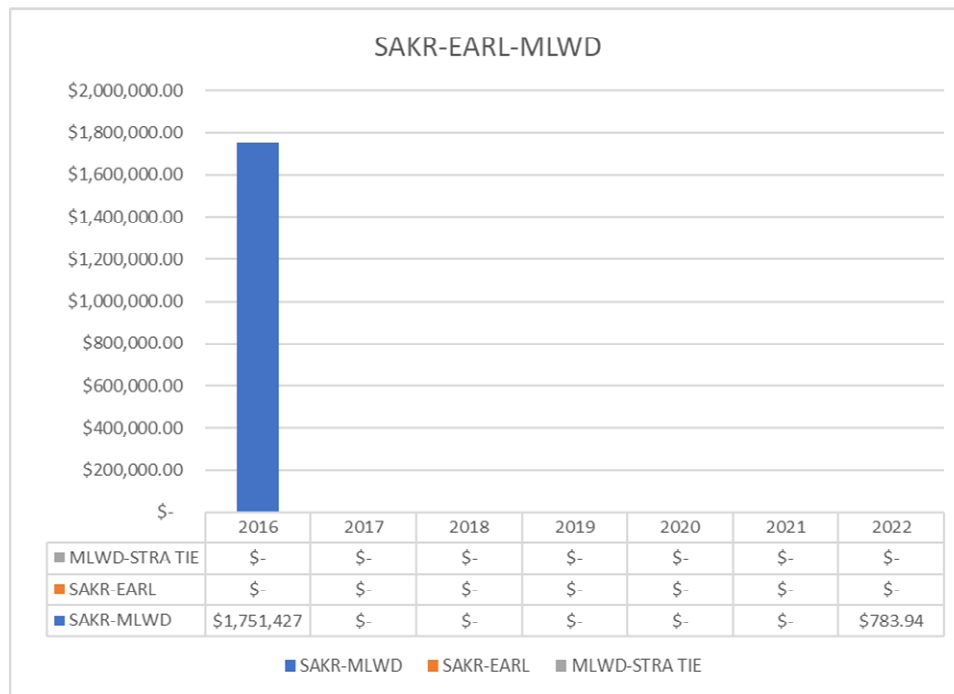
The majority of the above outages did not result in customers being interrupted. However, rebuilding this line will improve reliability for the customers served from these facilities. As stated in the Letter of Notification, the lines are in poor condition and if not addressed will ultimately fail. The 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.

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A-6 Reference the Letter of Notification, Attachment 1, page 2. Please provide a five-year history of maintenance expenses for transmission facilities to be replaced as part of the proposed project.

Response:



Historic maintenance expenses are not a good predictor of what future maintenance costs will be if the South Akron-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

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*under PPL Electric's preferred solution of a full rebuild of the
South Akron-Millwood 230kV Transmission Line.*

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A-7 Reference the Letter of Notification, Attachment 1, page 2. Please explain why PPL Electric is filing the Letter of Notification 11 months prior to the estimated construction start date.

Additionally, please provide the approximate date by which PPL Electric is seeking a Commission decision.

Response: 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, and 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 if approval is granted, the Company has sufficient time to finalize the items listed above.

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A-8 Reference the Letter of Notification, Attachment 2, page 3. Please explain whether any structures will be placed on properties or easements that did not previously have a structure. If so, state whether the easement agreement allows for structures on these properties.

Additionally, explain PPL Electric's process for informing the property owners that a structure will be placed on the easement to their property.

Response: There is one location where the numbers of structures will increase by one. In this location the existing easement agreement allows for the structure to be placed in the planned location. At a second location, the existing lattice tower appears to straddle the property line between two parcels. At this location, the new pole will be placed on one of the two properties.

It is PPL Electric's process to meet in person with the landowner, explain the addition of another pole on their property, show them a figure of where the additional pole will be located and ask the landowner to sign an acknowledgement letter documenting that they have been provided the information. At both locations described above, PPL Electric has obtained signed acknowledgment letters from the four landowners impacted (two landowners where the number of structures decreased by one and two landowners where the number of structures increased by one).

Witness: Joseph B. Lookup

VERIFICATION

I, JOSEPH B. LOOKUP, being the Director of Asset Management at PPL Services 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: 09/12/2022



Joseph B. Lookup