

COMMONWEALTH OF PENNSYLVANIA



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February 8, 2023

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Letter Of Notification Of PPL Electric Utilities Corporation, Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G, For Approval To Rebuild The Existing Double-Circuit Stanton-Summit #3 And #4 230 kV Transmission Lines Connecting the Stanton 230 kV Substation And A Two-Pole Turn Structure That Are Respectively Located In Luzerne And Lackawanna Counties, Pennsylvania
Docket No. A-2022-3037374

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Protest in the above-referenced proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Christopher M. Andreoli
Christopher M. Andreoli
Assistant Consumer Advocate
PA Attorney I.D. # 85676
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Enclosures:

cc: The Honorable Charles E. Rainey, Jr. (**email only:** crainey@pa.gov)
Bureau of Technical Utility Services (**email only:** pdiskin@pa.gov)
Office of Special Assistants (**email only:** ra-OSA@pa.gov)
Certificate of Service

*341019

CERTIFICATE OF SERVICE

Letter of Notification of PPL Electric Utilities :
Corporation, Filed Pursuant To 52 Pa. Code :
Chapter 57 Subchapter G, For Approval To :
Rebuild The Existing Double-Circuit :
Stanton-Summit #3 And #4 230 kV : Docket No. A-2022-3037374
Transmission Lines Connecting the Stanton :
230 kV Substation And A Two-Pole Turn :
Structure that are Respectively Located :
in Luzerne and Lackawanna Counties, :
Pennsylvania :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Protest, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 8th day of February 2023.

SERVICE BY E-MAIL ONLY

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Phone: (717) 783-5048
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Dated: February 8, 2023
*341018

Darryl A. Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
E-Mail: DLawrence@paoca.org

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification of PPL Electric Utilities :
Corporation for the Reconstruction of the : A-2022-3037374
Stanton-Summit #3 and #4 230 kV Transmission :
Line in Lackawanna and Luzerne Counties, :
Pennsylvania :

**PROTEST OF THE
OFFICE OF CONSUMER ADVOCATE**

Pursuant to 52 Pa. Code Sections 5.51, *et seq.*, the Office of Consumer Advocate (OCA) files this Protest to the Letter of Notification of PPL Electric Utilities Corporation (PPL or Company). On December 27, 2022, PPL filed the above-captioned Letter of Notification (LON) with the Pennsylvania Public Utility Commission (Commission), pursuant to 52 Pa. Code Section 57.72(d)(1)(i), to rebuild the existing double-circuit Stanton-Summit #3 and #4 230 kV Transmission Lines connecting the Stanton 230 kV Substation (Stanton Substation) and a two-pole turn structure located approximately 1.4 miles north of the Summit 230-69 kV Substation (Summit Substation), which are located in Luzerne and Lackawanna Counties, Pennsylvania (Project). LON at pg. 1.

PPL is a “public utility” and an “electric distribution company” as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 102, 2803. PPL owns approximately 5,000 miles of transmission lines operating at 69 kV (kilovolts) or higher, approximately 375 substations with a capacity of 10 MVA or more, and approximately 43,000 miles of distribution lines operating at less than 69 kV. PPL furnishes electric service to

approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania. LON at pg. 3.

On January 25, 2023, the OCA responded to PPL's LON by submitting a Notice of Intervention and Public Statement. The OCA now files this Protest to ensure that the interests of PPL customers are protected in this proceeding.

Specifically, the OCA avers as follows:

1. The name and contact information of the protestant is as follows:

Patrick M. Cicero, Consumer Advocate
Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Telephone: 717-783-5048

Throughout this Protest, the protestant will be referred to as the Office of Consumer Advocate or OCA.

2. The names and contact information for the OCA's attorneys for the purpose of receiving service of all documents in this proceeding are as follows:

Darryl Lawrence
Senior Assistant Consumer Advocate
DLawrence@paoca.org

Christopher M. Andreoli
Assistant Consumer Advocate
CAAndreoli@paoca.org

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Telephone: 717-783-5048

3. The OCA is authorized by law to represent the interests of Pennsylvania's utility consumers in all matters before the Commission. 71 P.S. §§ 309-1 *et seq.*

4. The Commission has jurisdiction over the lines in question and the LON must be examined pursuant to 52 Pa. Code Sections 57.71-57.77.

5. Pursuant to 52 Pa. Code Section 57.76, the Commission may not grant the LON to approve the lines in question, unless it finds:

- (1) That there is a need for it;
- (2) That it will not create an unreasonable risk of danger to the health and safety of the public;
- (3) That it is in compliance with applicable statutes and regulations providing for the protection of the natural resources of this Commonwealth, and
- (4) That it will have minimum adverse environmental impact, considering the electric power needs of the public, the state of available technology and the available alternatives.

6. The OCA submits that the Commission must determine whether the Project as proposed is necessary, and must examine its potential adverse impact on the residents of the area and the environment as compared with any potential reliability improvements.

7. The OCA is concerned that PPL has not adequately and thoroughly explored various alternatives to its proposed Project, including, but not limited to, grid enhancing technologies, demand side options, and whether a rebuild of the existing 230 kV network is the best long-term option for improved reliability, resiliency and in the best interest of ratepayers.

8. The OCA is concerned with the cost of this limited rebuild of only a small section of PPL's transmission infrastructure, currently estimated at almost \$37 million.

9. The OCA is also concerned about the identified rust issue, how long PPL has been "studying" this problem, and to what extent PPL is aware of this condition being present across other lattice structures in its system. According to PPL, "this Project is necessary to resolve significant asset health condition concerns across the Stanton-Summit #3 and #4 230 kV

Transmission Lines connecting the Stanton Substation and a two-pole 5 24909726v1 turn structure (Structures 56275-N-47514(L)/56274-N-47518(R)) located approximately 1.4 miles north of the Summit Substation associated with the presence of pack-out rust in the existing COR-TEN® steel lattice towers and thereby resolve service reliability and safety risks associated with the potential failure of these structures.” LON at pg. 4-5. The OCA intends to investigate this “pack-out rust” issue, and the extent to which this condition is or may be present on other PPL infrastructure and what PPL plans to do about this condition on a going-forward basis as to other potential repairs or rebuilds.

8. PPL’s request should be subject to thorough formal investigation and evidentiary hearings. The Commission should allow for notice and opportunity to be heard for all affected parties, including public input hearings throughout the areas affected by this Application, as may be necessary. PPL has the burden of proof in this matter, and the written testimony submitted in support of its request should be subject to cross-examination by the parties.

9. The OCA reserves the right to raise additional issues as the case proceeds and further information is obtained regarding the Project.

WHEREFORE, the Office of Consumer Advocate respectfully requests that the Pennsylvania Public Utility Commission not approve this Project at this time due to the issues raised above and the need for additional information. The Office of Consumer Advocate respectfully requests that the Pennsylvania Public Utility Commission investigate and hold full hearings regarding the proposed Project.

Respectfully submitted,

/s/ Christopher M. Andreoli
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PA Attorney I.D. # 85676
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Darryl Lawrence
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