

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO  
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE  
555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
(800) 684-6560

 @pa\_oca  
 /pennoca  
FAX (717) 783-7152  
consumer@paoca.org  
www.oca.pa.gov

April 12, 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 Prehearing Memorandum 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  
E-Mail: [CAandreoli@paoca.org](mailto:CAandreoli@paoca.org)

Enclosures:

cc: The Honorable Mark Hoyer (**email only**)  
The Honorable Darlene Heep (**email only**)  
Certificate of Service

\*344169

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 Prehearing Memorandum, 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 12<sup>th</sup> day of April 2023.

**SERVICE BY E-MAIL ONLY**

Richard A. Kanaskie, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
[rkankaskie@pa.gov](mailto:rkankaskie@pa.gov)  
*Counsel for I&E*

NazAarah Sabree, Small Business Advocate  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[ra-sba@pa.gov](mailto:ra-sba@pa.gov)  
*Counsel for OSBA*

Michael J. Shafer, Esquire  
PPL Services Corporation  
2 North Ninth Street  
Allentown, PA 18101-1179  
[kklock@pplweb.com](mailto:kklock@pplweb.com)  
[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)  
*Counsel for PPL*

David B. MacGregor, Esquire  
Garrett P. Lent, Esquire  
Nicholas A. Stobbe, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)  
[nstobbe@postschell.com](mailto:nstobbe@postschell.com)  
*Counsel for PPL*

/s/ Christopher M. Andreoli  
Christopher M. Andreoli  
Assistant Consumer Advocate  
PA Attorney I.D. # 85676  
E-Mail: [CAAndreoli@paoca.org](mailto:CAAndreoli@paoca.org)

Counsel for:  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Dated: April 12, 2023  
\*344168

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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Letter of Notification of PPL Electric Utilities	:	
Corporation Filed under 52 Pa. Code Chapter 57,	:	
Subchapter G, for approval to rebuild the existing	:	
double-circuit Stanton-Summit # 3 and	:	A-2022-3037374
# 4 230 kV transmission lines connecting the	:	
Stanton 230-69 kV substation and a two-pole	:	
turn structure that are respectively located in	:	
Luzerne and Lackawanna Counties, Pennsylvania	:	

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PREHEARING MEMORANDUM OF THE  
OFFICE OF CONSUMER ADVOCATE

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Pursuant to the Prehearing Conference Order of Deputy Chief Administrative Law Judge Mark Hoyer and Administrative Law Judge Darlene Heep issued on February 24, 2023, Section 333 of the Public Utility Code, 66 Pa. C.S. § 333, and in anticipation of the telephonic Prehearing Conference scheduled for April 13, 2023, the Office of Consumer Advocate (OCA) provides the following information:

I. INTRODUCTION AND PROCEDURAL HISTORY

PPL Electric Utilities Corporation (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 in eastern and central Pennsylvania.

On December 27, 2022, PPL filed a Letter of Notification (LON) for the Reconstruction of the Stanton-Summit #3 and #4 230 kV Transmission Line. On January 25, 2023, the OCA responded to PPL's LON by submitting a Notice of Intervention and Public Statement. Subsequently, the OCA filed a Formal Protest on February 8, 2023.

## II. ISSUES

The OCA is participating in this proceeding to ensure that the interests of PPL's existing customers are protected. Based upon its investigation and review of the filing, the OCA has compiled a list of issues to be addressed. These issues will be presented as appropriate by the OCA with the assistance of its expert witnesses. They are as follows:

1. Whether the Project as proposed is necessary including any potential adverse impact on the residents of the area and the environment as compared with any potential reliability improvements.
2. Whether PPL has 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.
3. Whether PPL has adequately justified the cost of this limited rebuild of only a small section of PPL's transmission infrastructure, currently estimated at almost \$37 million.
4. Whether PPL has adequately addressed the "pack-out rust" issue, including how

long PPL has been “studying” this rust problem and to what extent PPL is aware of this condition being present across other lattice structures in its system.

The OCA reserves the right to address any additional issues that arise during the course of the proceeding.

### III. WITNESSES

The OCA intends to present the direct, rebuttal and surrebuttal testimony, as may be necessary, of Rao Konidena in this proceeding. Mr. Konidena will present testimony in written form and will also attach various exhibits, documents, and explanatory information that will assist in the presentation of the OCA’s case. In order to expedite the resolution of this proceeding, the OCA requests that copies of all interrogatories, testimony, and answers to interrogatories be mailed directly to its expert witness at the following address, as well as mailing a copy to counsel for the OCA:

Rao Konidena  
Rakon Energy, LLC  
2309 Auerbach Street  
Roseville, MN 55113  
[rkonidena76@gmail.com](mailto:rkonidena76@gmail.com)

The OCA specifically reserves the right to call additional witnesses, as necessary. If the OCA determines that additional witnesses will be necessary for any portion of its case, it will notify all parties of record immediately.

### IV. PROPOSED SCHEDULE AND AMOUNT OF TIME NEEDED FOR HEARINGS

The OCA will cooperate with the ALJ and the parties to develop a mutually agreeable litigation schedule for this case. The OCA requests that the dates included in any litigation schedule in this matter be considered “in-hand” dates and that electronic service on the due date will satisfy the “in-hand” requirement, without provision of hard copies.

## V. DISCOVERY

At this time, the OCA is not requesting any discovery modifications. The OCA will cooperate with the ALJ and the parties to develop a mutually agreeable schedule for this case.

## VI. PUBLIC INPUT HEARING

At this time, the OCA is not requesting a Public Input Hearing. However, the OCA reserves the right to make such a request if the OCA determines that one is necessary.

## VII. SERVICE ON THE OCA

The OCA will be represented in this case by Senior Assistant Consumer Advocate Darryl A. Lawrence and Assistant Consumer Advocate Christopher M. Andreoli. Darryl A. Lawrence will act as the lead attorney for purposes of participating in the Prehearing Conference. All documents should be served on the OCA as follows:

Darryl A. Lawrence  
Christopher M. Andreoli  
555 Walnut Street, 5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: 717-783-5048

The OCA will accept email service without provision of a hard copy. To the extent that materials are available electronically, it is requested that copies be served upon all of the following:

Darryl A. Lawrence – [DLawrence@paoca.org](mailto:DLawrence@paoca.org)  
Christopher M. Andreoli - [CAAndreoli@paoca.org](mailto:CAAndreoli@paoca.org)  
Lauren R. Myers – [LMyers@paoca.org](mailto:LMyers@paoca.org)  
Rao Konidena – [rkonidena76@gmail.com](mailto:rkonidena76@gmail.com)

## VIII. SETTLEMENT

The OCA is willing to participate in settlement discussions in this matter, at the appropriate time.

Respectfully submitted,

/s/ Christopher M. Andreoli  
Christopher M. Andreoli  
Assistant Consumer Advocate  
PA Attorney I.D. # 85676  
[CAndreoli@paoca.org](mailto:CAndreoli@paoca.org)

Darryl A. Lawrence  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 93682  
[DLawrence@paoca.org](mailto:DLawrence@paoca.org)

Counsel for:  
Patrick M. Cicero  
Consumer Advocate

Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place Harrisburg, PA 17101-1923  
Phone: 717-783-5048  
Fax: 717-783-7152  
Dated: April 12, 2023