
Nicholas A. Stobbe

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File #: 197389

April 12, 2023

VIA EMAIL

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor North
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 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 filing is the Prehearing Conference Memorandum of PPL Electric Utilities Corporation in the above-referenced proceeding.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Nicholas A. Stobbe

NAS/dmc
Enclosures

cc: The Honorable Mark Hoyer (w/attachment)
The Honorable Darlene Heep (w/attachment)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA EMAIL ONLY

Richard A. Kanaskie, Esquire
Pennsylvania Bureau of Investigation and
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VIA REGULAR MAIL

Regional Permit Coordination Office
Pennsylvania Department of Environmental
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Mr. Douglas C. Mclearen, Chief
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Commission
Bureau For Historic Preservation
400 North Street
Harrisburg, Pa 17120-0053
Planning Division

U.S. Army Corps Of Engineers
Baltimore District Corporate
Communication Office
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Baltimore, Md 21201

Lesia Lindsay
U.S. Fish and Wildlife Service
Pennsylvania Field Office
110 Radnor Road, Suite 101
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Jerry Stiles, District Manager
Lackawanna County Conservation District
1038 Montdale Road
Scott Township, Pa 18447

Brenda Sacco, Director
Lackawanna County Regional Planning
Commission
Lackawanna County Government Center
123 Wyoming Avenue
Scranton, Pa 18503

Josh Longmore, Executive Director
Luzerne County Conservation District
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N. Brian Caverly, Chair
Luzerne County Planning Commission
Luzerne County Courthouse
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Nancy Redmond, Chairperson
Exeter Township
State Route 92 Highway
Harding, Pa 18643

Douglas Pallman, Chairperson
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Clarks Summit, Pa 18411

Dennis Macheska, Chairperson
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John Wells & Susan A. Wells
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Jim Williams Jr.
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Scranton, Pa 18508-1634

Robert S. Yusinski & Ronald Bird
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Date: April 12, 2023



Nicholas A. Stobbe

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter Of Notification Of PPL Electric :
Utilities Corporation, Filed Pursuant To 52 :
Pa. Code Chapter 57 Subchapter G, For : Docket No. A-2022-3037374
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 :

**PREHEARING CONFERENCE MEMORANDUM OF
PPL ELECTRIC UTILITIES CORPORATION**

**TO DEPUTY CHIEF ADMINISTRATIVE LAW JUDGE MARK A. HOYER AND
ADMINISTRATIVE LAW JUDGE DARLENE HEEP:**

Pursuant to 52 Pa. Code § 5.224(c) and the February 24, 2023, Prehearing Conference Order, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby submits this Prehearing Conference Memorandum.

I. SERVICE OF DOCUMENTS

1. PPL Electric requests that all documents be served on:

Garrett P. Lent, Esquire
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
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Nicholas A. Stobbe, Esquire
Post & Schell, P.C.
17 North Second Street
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Harrisburg, PA 17101-1601
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Please be advised that Mr. Garrett P. Lent will speak as the lead attorney for PPL Electric for purposes of the prehearing conference. However, other counsel for PPL Electric will be participating and available during the telephonic prehearing conference as needed.

2. PPL Electric agrees to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies be served upon, David B. MacGregor, Esquire at dmacgregor@postschell.com, and Michael J. Shafer, Esquire at mjshafer@pplweb.com.

II. PROCEDURAL HISTORY

3. This proceeding was initiated on December 27, 2022, when PPL Electric filed the above-captioned “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” (hereinafter, the “Letter of Notification”) with the Pennsylvania Public Utility Commission (“Commission”). In the Letter of Notification, PPL Electric requested Commission approval 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 (Structures 56275-N-47514(L)/56274-N47518(R)) located approximately 1.4 miles north of the Summit 230-69 kV Substation (“Summit Substation”) that are respectively located in Luzerne and Lackawanna Counties, Pennsylvania (“Project”)

4. On December 27, 2022, the Commission issued a Secretarial Letter acknowledging receipt of the Letter of Notification.

5. On January 25, 2023, the Office of Consumer Advocate (“OCA”) filed a Notice of Intervention and Public Statement.

6. On February 8, 2023, the OCA filed a Protest.

7. The Commission issued an Initial Call-In Telephonic Prehearing Conference Notice for the above-captioned dockets on February 24, 2023. Deputy Chief Administrative Law Judge Mark A. Hoyer and Administrative Law Judge Darlene Heep (the “ALJs”) were assigned to preside over the above-captioned proceedings.

8. Also on February 24, 2023, the ALJs issued a Prehearing Conference Order.

9. On March 14, 2023, PPL Electric filed a proof of publication and affidavit showing that notice of the Letter of Notification was published in The Scranton Times Tribune on February 24, 2023 and March 3, 2023, and in The Reading Eagle on February 26, 2023 and March 5, 2023.

10. Pursuant to 52 Pa. Code § 5.224(c) and the February 24, 2023 Prehearing Conference Order, PPL Electric hereby submits this Prehearing Conference Memorandum.

III. ISSUES

11. In the Letter of Notification, PPL Electric has requested Commission approval to rebuild the existing double-circuit Stanton-Summit #3 and #4 230 kV Transmission Lines. PPL Electric intends to demonstrate that the Project is required to address asset health conditions and reliability concerns related to the deteriorated condition of the COR-TEN® lattice towers on the Summit-Summit #3 and #4 230 kV Transmission Lines.

12. PPL Electric also intends to demonstrate that the Project will not create any unreasonable risk of danger to the public health or safety, and that the proposed lines will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electrical Safety Code (“NESC”) minimum standards and all applicable legal requirements.

13. In addition, the Company will show that the proposed Project is in compliance with applicable statutes and regulations providing for the protection of the natural resources of this Commonwealth. PPL Electric will also continue to consult with the jurisdictional agencies regarding potential impacts to protected species, complete all required surveys, obtain all necessary approvals and permits for Project construction, and comply with conditions placed on those permits.

14. Furthermore, PPL Electric intends to demonstrate that the Project will have a minimum adverse environmental impact considering the electric power needs of the public. As explained in the Letter of Notification, the Project involves the rebuilding of existing transmission facilities within existing transmission line right-of-way (“ROW”) in order to resolve an asset health condition. Therefore, it is anticipated that the proposed rebuild of the Stanton-Summit #3 and #4 230 kV Transmission Lines will have minimal incremental impacts on the environment and land use in the area.

15. Finally, PPL will demonstrate that it possesses sufficient existing ROW to complete the Project, the Project will be constructed entirely within the existing ROW, and that the Project will not substantially alter the existing ROW. PPL Electric plans to demonstrate that the new structures will be located in close proximity to existing structures where it is reasonably practical to do so and that where structures will be substantially relocated, PPL Electric will discuss the proposed structure locations with the respective property owners. Additionally, PPL Electric will demonstrate that the existing number of structures on each parcel will not change, and no new structures will be added to properties that do not currently have a structure.

IV. WITNESSES

16. PPL Electric presently intends to offer the following additional witness to testify in this proceeding on the following subject matters, to the extent necessary:

Witness	Subjects Addressed
Joseph B. Lookup Director of Asset Management PPL Services Corporations 2 North 9 th Street Allentown, PA 18101	Transmission System Planning PJM Interconnection, LLC Process Need For The Summit-Lackawanna Project Engineering and Design of The Summit-Lackawanna Project

The Company's attachments and exhibits included in its initial filing fully support the Letter of Notification.

17. PPL Electric also reserves the right to call and present additional witnesses and testimony as it deems necessary, and/or to address any issues that may arise during the course of the proceeding.

V. DISCOVERY

18. To date, PPL Electric has received formal requests for documents from OCA and has diligently responded to these requests.

19. At this time, PPL Electric does not propose any modifications to the standard timelines for discovery set forth in the Commission's regulations. However, to the extent that the procedural schedule agreed upon by the parties necessitates modifications to the standard timelines for discovery, PPL Electric is willing to negotiate reasonable modifications to the standard timelines for discovery.

20. PPL Electric also encourages the use of informal discovery to expedite the discovery process.

21. Finally, PPL Electric proposes the use of electronic service of discovery responses.

VI. LITIGATION SCHEDULE

22. PPL Electric and OCA have engaged in discussions regarding the schedule for this proceeding. These discussions remain ongoing as of the submission of this Prehearing

Memorandum. At this time, PPL Electric proposes that the following schedule be adopted, which it has preliminarily shared with OCA:

Filing	December 27, 2022
Prehearing Conference	April 13, 2023
Company Direct Testimony	June 27, 2023
OP Rebuttal Testimony	July 27, 2023
Company Surrebuttal Testimony	August 3, 2023
Evidentiary Hearings¹	August 15-16, 2023
Main Brief	September 16, 2023
Reply Brief	September 30, 2023

PPL Electric will continue to work with OCA, and any other parties to intervene in this matter prior to the scheduled Prehearing Conference, to develop a mutually agreed upon schedule. PPL Electric is willing to work the parties to accommodate potential scheduling conflicts for the parties' witnesses to attend and testify at the evidentiary hearings.

¹ PPL Electric proposes that, to the extent the Commission is open to the public and the ALJs are available at this time, the evidentiary hearings be held in person in Harrisburg, PA.

VII. SETTLEMENT

23. As of this time, no settlement discussions have been held. PPL Electric remains open and available for settlement discussions with the other parties and would support initiatives to begin settlement discussions at the earliest possible date.

Respectfully submitted,



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David B. MacGregor (I.D. # 28804)
Garrett P. Lent (I.D. # 321566)
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Date: April 12, 2023

Attorneys for PPL Electric Utilities Corporation