
Lindsay A. Berkstresser

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File # 198674

August 15, 2023

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 To Rebuild Approximately 0.9 Mile of The Existing Siegfried-Frackville 230 kV, Eldred-Frackville 230 kV, and Columbia-Frackville 230 kV Transmission Lines in Butler Township, Schuylkill County, Pennsylvania
Docket No. A-2023-3040694**

Dear Secretary Chiavetta:

On May 15, 2023, PPL Electric Utilities Corporation (“PPL Electric”) filed the Letter of Notification of PPL Electric Utilities Corporation, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, For Approval to Rebuild Approximately 0.9 Mile of The Existing Siegfried-Frackville 230 kV, Eldred-Frackville 230 kV, and Columbia-Frackville 230 kV Transmission Lines in Butler Township, Schuylkill County, Pennsylvania (“Letter of Notification”). It was discovered that Paragraph 32 of the Letter of Notification contains an error. Paragraph 32 of the Letter of Notification states that the cost of the alternative is \$21 million. The correct figure is \$45 million, as reflected in Attachment 1, page 13 of the Letter of Notification. Paragraph 32 of the Letter of Notification is being revised to state as follows:

32. Importantly, as explained in Attachment 1 – Necessity Statement, the Project as proposed also avoids the additional costs and uncertainties surrounding the alternative considered by PPL Electric. As an alternative to the proposed Project, PPL Electric considered replacing the equipment at the Existing Frackville Substation in place and undertaking mitigation work. This alternative would require PPL Electric to replace several existing assets as described in Attachment 1 – Necessity Statement at a cost of approximately **\$45** million, as well as to construct approximately 3 miles of tie lines to mitigate the operational risk of taking outages to perform the

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replacements and necessary cutover work at a cost of \$32 million. Not only is this alternative much more costly, it does not resolve all of the operational and reliability problems with the Existing Frackville Substation. For example, the alternative would not resolve an identified 500 MW load pocket voltage collapse exposure, nor would it eliminate the heightened chance of an Electric System Event (“ESE”) risk that could happen while performing complex cutover work at the Existing Frackville Substation. Additionally, the alternative would not correct the non-standard designed substation. For these reasons, PPL Electric rejected the alternative of replacing equipment in place and undertaking mitigation work.

If you have any questions concerning this matter, please contact me at the address or telephone numbers provided above. Copies has been provided as indicated on the Certificate of Service.

Respectfully submitted,


Lindsay A. Berkstresser

LAB/dmc
Enclosures

cc: Paul T. Diskin (*via email; w/attachments*)
Jordan Van Order (*via email; w/attachments*)
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 E-MAIL ONLY

Pennsylvania Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
2nd Floor, Room-N201
Harrisburg, Pennsylvania 17120
Attn: Richard Kanaskie

Pennsylvania Office of Consumer Advocate
555 Walnut Street, 5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923
Attn: Patrick Cicero, Consumer Advocate

Pennsylvania Office of Small Business Advocate
555 Walnut Street
1st Floor Forum Place
Harrisburg, Pennsylvania 17101
Attn: Steven Gray, Senior Supervising Assistant Small Business Advocate

VIA FIRST-CLASS MAIL ONLY

Pennsylvania Department of Environmental
Protection
400 Market Street, 10th Floor
Rachel Carson State Office Building
Harrisburg, Pennsylvania 17101
Attn: Regional Permit Coordination Office

Pennsylvania Department of Transportation
Commonwealth Keystone Building
400 North Street, Fifth Floor
Harrisburg, Pennsylvania 17120
Attn: Donald J. Smith, Acting Chief Counsel

Pennsylvania Historical and Museum
Commission
Bureau for Historic Preservation
Commonwealth Keystone Building
Second Floor
400 North Street
Harrisburg, Pennsylvania 17120-0053
Attn: Mr. Douglas C. McLearn, Chief

Pennsylvania Department of Conservation
and Natural Resources
Rachel Carson State Office Building
400 Market Street
Harrisburg, Pennsylvania 17105-8767
Attn: Rebecca Bowen, Ecological Services
Section Chief

Pennsylvania Game Commission
2001 Elmerton Avenue
Harrisburg, Pennsylvania 17110-9797
Attn: David J. Gustafson, Director, Bureau
of Wildlife Habitat Management

Pennsylvania Fish and Boat Commission
Centre Region Office
595 East Rolling Ridge Drive
Bellefonte, Pennsylvania 16823-9620
Attn: Christopher A. Urban, Chief, Natural
Diversity Section

U.S. Army Corps of Engineers
Baltimore District Corporate
Communication Office
2 Hopkins Plaza
Baltimore, Maryland 21201
Attn: Planning Division

U.S. Fish and Wildlife Service
Pennsylvania Field Office
110 Radnor Road, Suite 101
State College, Pennsylvania 16801
Attn: Lesa Lindsay

Schuylkill County Planning Commission
401 North 2nd Street, Second Floor
Pottsville, Pennsylvania 17901
Attn: Susan A. Smith, Planning Director

Schuylkill County Conservation District
1206 AG Center Drive
Pottsville, Pennsylvania 17901
Attn: Jenna St. Clair, Conservation District
Manager

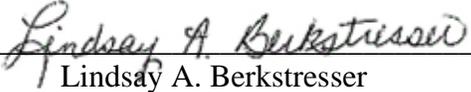
Schuylkill County Municipal Authority
221 South Center Street
Pottsville, Pennsylvania 17901
Attn: Franklin K. Schoeneman, Chairman

Butler Township
211 Broad Street
Ashland, Pennsylvania 17921

Ashland Area Municipal Authority
Ashland Borough Office
401 South 18th Street
Ashland, Pennsylvania 17921
Attn: Francis Menne, Chairman

Mt. Laurel Entreprises
15 Main Street
Port Carbon, PA 17965
Attn: Dan Blaschak

Date: August 14, 2023


Lindsay A. Berkstresser