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Garrett P. Lent

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File #: 202493

January 24, 2024

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Application of PPL Electric Utilities Corporation filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval to Site and Construct a New Single-Circuit 115 kV Transmission Line Between the Williams Grove 230-69 kV Substation and the Allen 115-13 kV Substation Located in Cumberland County, Pennsylvania  
Docket No. A-2023-3044071**

Dear Secretary Chiavetta:

Attached for filing is the Prehearing Conference Memorandum on behalf of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies are being provided as indicated on the Certificate of Service.

Respectfully submitted,



Garrett P. Lent

GPL/kl  
Attachment

cc: The Honorable Mary D. Long (*via email; w/attachment*)  
The Honorable Alphonso Arnold III (*via email; 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 § 57.74(b).

### **VIA FIRST-CLASS MAIL**

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

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: NazAarah Sabree, Small Business  
Advocate

Cumberland County Board of  
Commissioners  
1 Courthouse Square, 2nd Floor, Suite 200  
Carlisle, Pennsylvania 17013  
Attn: Gary Eichelberger, Chairman

Cumberland County Conservation District  
310 Allen Road, Suite 301  
Carlisle, Pennsylvania 17013  
Attn: Carl Goshorn, District Manager

Cumberland County Agricultural Land  
Preservation Board  
310 Allen Road, Suite 101  
Carlisle, Pennsylvania 17013  
Attn: Stephanie Williams, Program  
Administrator

Cumberland County Planning Department  
310 Allen Road, Suite 101  
Carlisle, Pennsylvania 17013  
Attn: Heather Sweitzer, Chair

Monroe Township  
1220 Boiling Springs Road  
Mechanicsburg, Pennsylvania 17055  
Attn: Karen Lowery, Secretary

Monroe Township Board of Supervisors  
1220 Boiling Springs Road  
Mechanicsburg, Pennsylvania 17055  
Attn: Phil Kehoe, Chairman

Monroe Township Planning Commission  
1220 Boiling Springs Road  
Mechanicsburg, Pennsylvania 17055  
Attn: Sharon Nelson, Chairman

Upper Allen Township  
100 Gettysburg Pike  
Mechanicsburg, Pennsylvania 17055  
Attn: Scott Fraser, Manager

Upper Allen Township Board of Supervisors  
100 Gettysburg Pike  
Mechanicsburg, Pennsylvania 17055  
Attn: Kenneth M. Martin, President

Upper Allen Township Planning  
Commission  
100 Gettysburg Pike  
Mechanicsburg, Pennsylvania 17055  
Attn: R. Wayne Willey, Chairperson

President of FirstEnergy Pennsylvania  
Electric Company (Met-Ed Rate District)  
C/O Tori L. Giesler, Esq.  
FirstEnergy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, PA 19612-6001

President of Mid-Atlantic Interstate  
Transmission  
C/O Tori L. Giesler, Esq.  
FirstEnergy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, PA 19612-6001

Date: January 24, 2024

  
Garrett P. Lent

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities Corporation, :  
Pursuant to 52 Pa. Code Chapter 57 :  
Subchapter G, for Approval to Site and :  
Construct a New Single-Circuit 115 kV : A-2023-3044071  
Transmission Line Between the Williams Grove :  
230-69 kV Substation and the Allen 115-13 kV :  
Substation Located in Cumberland :  
County, Pennsylvania :

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**PREHEARING MEMORANDUM  
OF PPL ELECTRIC UTILITIES CORPORATION**

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Pursuant to the Prehearing Conference Order of Administrative Law Judge Mary D. Long and Administrative Law Judge Alphonso Arnold III (collectively, the “ALJs”), dated January 11, 2024, and 52 Pa.Code §5.221 - § 5.224, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby submits its Prehearing Conference Memorandum.

**I. SERVICE ON PPL ELECTRIC**

1. PPL Electric will be represented in this case by the counsel named below. Copies of all documents should be served on PPL Electric as follows:

Michael J. Shafer (I.D. # 205681)  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
Phone: 610-774-2599  
Fax: 610-774-4102  
E-mail: mjshafer@pplweb.com

David B. MacGregor (I.D. # 28804)  
Garrett P. Lent (I.D. # 321566)  
Nicholas A. Stobbe (I.D. # 329583)  
Post & Schell, P.C.  
17 North Second Street

12th Floor  
Harrisburg, PA 17101-1601  
Phone: 717-731-1970  
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E-mail: dmacgregor@postschell.com  
glent@postschell.com  
nstobbe@postschell.com

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.

## **II. BACKGROUND**

2. On November 3, 2023, PPL Electric filed, pursuant to 52 Pa. Code § 57.72, a an application requesting Pennsylvania Public Utility Commission (“Commission”) approval to site and construct a new 3.9 mile long, single-circuit 115 kilovolt (“kV”) transmission line between the Williams Grove 230-69 kV Substation and the Allen 115-13 kV Substation, located in Cumberland County, Pennsylvania (“Williams Grove-Allen 115 kV Transmission Line Project” or “Project”).

3. On January 11, 2024, the ALJs issued a Prehearing Conference Order providing, among other things, that a Telephonic Prehearing Conference would be held on January 25, 2024, at 10:00 a.m. The Prehearing Conference Order also provided that formal protests and petitions to intervene must be filed in accordance with 52 Pa.Code (relating to public utilities) on or before January 19, 2024. As of the date of this memorandum, PPL Electric has not been served with any protests or interventions in this matter.

4. The Williams Grove-Allen 115 kV Transmission Line Project is needed to resolve voltage magnitude and voltage drop violations for multiple N-1-1 contingencies, which violates Mid-Atlantic Interstate Transmission’s (“MAIT”) Transmission Owner Criteria and North

American Electric Reliability Corporation Standard TPL-001-4. PPL Electric and PJM Interconnection, L.L.C. (“PJM”) have determined that the new Williams Grove-Allen 115 kV Transmission Line is the optimal solution to address these reliability problems. Moreover, the preferred route for the Project is the most reasonable of the alternative routes considered and minimizes the effect of the transmission line on the natural and human environment, while avoiding unreasonable and circuitous routes, extreme costs, and non-standard design requirements.

### **III. ISSUES**

5. PPL Electric intends to demonstrate that the above-captioned Project satisfies the criteria applicable to the Commission’s approval of high-voltage electric transmission lines at 52 Pa. Code § 57.76(a). In particular, PPL Electric intends to demonstrate that there is a need for the Project, the Project will not create an unreasonable risk of danger to the health and safety of the public, the Project is in compliance with applicable statutes and regulations providing for the protection of the natural resources, and the Project will have minimum adverse environmental impact, considering the electric power needs of the public, the state of available technology and the available alternatives. *See id.* PPL Electric further submits that it has satisfied these requirements based upon the information included in its initial filing, which includes its written direct testimony and exhibits.

6. Notice of the above-captioned siting application was published in the December 2, 2023 edition of the *Pennsylvania Bulletin*. The deadline for the submission of a petition to intervene and/or protest in this matter was January 19, 2024. PPL Electric was not served with any petition to intervene and/or protest on or before January 19, 2024, and it does not appear that any petition to intervene and/or protest has been filed with the Commission. Therefore, PPL Electric is not aware of any actual or potential intervenors.

7. In the absence of adverse parties, there is no need for an evidentiary hearing before an Administrative Law Judge(s). As such, PPL Electric respectfully requests that this matter be assigned to the Commission’s Bureau of Technical Utility Services (“TUS”). To the extent that other parties intervene in this proceeding, and such interventions necessitate the establishment of a procedural schedule, PPL Electric will work with any parties to develop a proposed litigation schedule, as addressed below in Section VII, *supra*.

**IV. WITNESSES**

8. In the event a hearing or hearings occur, PPL Electric will provide the testimonies of the following witnesses, as may be necessary.

<b>Witness</b>	<b>Subjects Addressed</b>
Jospeh B. Lookup Director, Asset Management PPL Electric Utilities Corporation 827 Hausman Road Allentown, PA 18104	Need for the Project Description of the Project
Christopher Szmodis Manager, Transmission Planning PPL Electric Utilities Corporation 827 Hausman Road Allentown, PA 18104	Transmission and PJM Planning Process
Peter Sparhawk Senior Vice President, T&D Market Sector Lead, Earth and Environment WSP USA 350 Eagleview Boulevard, Suite 250 Exton, PA 19341	Route Alternatives Siting Analysis Environmental Assessment and Mitigation
Austin K. Weseloh Tramission Right of Way and Real Estate Supervisor PPL Services Corporation 827 Hausman Road Allentown, PA 18104	Right-of-Way Easement Rights Real Estate

9. PPL Electric reserves the right to call additional witnesses, as necessary. If PPL Electric determines an additional witness or witnesses will be necessary for any portion of its case, the ALJs and all parties of record – to the extent there are any beyond PPL Electric – will be notified promptly.

**V. EVIDENCE**

10. At this time, PPL Electric submits that the above-captioned proceeding can be resolved by reliance upon the information included in its initial filing, and associated direct testimony. To the extent that other parties ultimately participate in this proceeding, PPL Electric reserves the right to respond to any evidence presented by another party and to rely upon any evidence presented by another party.

**VI. PROCEDURAL RULES / DISCOVERY**

11. PPL Electric is not requesting any modification of the Commission’s procedural rules regarding discovery are necessary at this time. PPL Electric agrees to cooperate with the parties – to the extent there are any – regarding any requested modification to the Commission’s procedural discovery rules.

**VII. PROPOSED SCHEDULE**

12. To the extent that a hearing(s) becomes necessary, PPL Electric proposes the following procedural schedule:

**PROPOSED SCHEDULE**

Other Parties’ Direct Testimony	March 25, 2024
Rebuttal Testimony	April 25, 2024
Surrebuttal Testimony	May 24, 2024
Hearings (including oral rejoinder)	June 13 and 14, 2024

Main Brief

July 12, 2024

Reply Brief

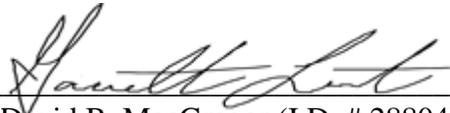
July 26, 2024

PPL Electric will work with parties and the ALJs to modify the schedule as may be necessary, should the proceeding not be referred to TUS.

**VIII. SETTLEMENT**

13. As of this time, no other parties have intervened in this proceeding and, therefore, no settlement discussions have been held. To the extent other parties join this proceeding, 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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Date: January 24, 2024

Attorneys for PPL Electric Utilities Corporation