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File# 204762

April 15, 2024

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 The Exiting Double-Circuit Harwood-East Palmerton and Siegfried-East Palmerton Transmission Lines Connecting The Harwood 230-69 kV Substation Located in Carbon County, Pennsylvania And The Siegfried 230-138-69kV Substation Located In Northampton County, Pennsylvania
Docket No. A-2024-3047924**

Dear Secretary Chiavetta:

Enclosed, on behalf of PPL Electric Utilities Corporation (“PPL Electric”), is information being supplied to the Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Technical Utility Services (“TUS”) in response to TUS Set I Data Requests regarding the above-captioned proceeding. PPL Electric’s responses to these data requests include the following **CONFIDENTIAL** and **PROPRIETARY** attachments:

- **CONFIDENTIAL** Attachment TUS-A-2 RTR Energy Solutions, Inc. Corten Inspection Report.

This attachment contains **CONFIDENTIAL** and **PROPRIETARY** information and is being filed separately with the Commission via ShareFile.

Rosemary Chiavetta, Secretary
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**REQUEST FOR CONFIDENTIAL TREATMENT
OF PROPRIETY INFORMATION**

The enclosure is marked “**CONFIDENTIAL AND PROPRIETARY**” because it contains commercially sensitive information, including, but not limited to, details about the condition of existing PPL Electric transmission structures and analysis of the same. PPL Electric requests that the copy of the material that have been labeled “**CONFIDENTIAL AND PROPRIETARY**” be given confidential treatment by the Commission, including its various offices and bureaus. That is, PPL Electric requests that the confidential material be excluded from the Commission’s public document folder and that the confidential copy not be disclosed to the public.

If there are any questions concerning this matter, please contact me at the addresses or telephone numbers provided above.

Respectfully submitted,



Nicholas A. Stobbe

NAS/dmc
Enclosures

cc: Jordan V. Order (*via email; w/attachments*)

**PPL Electric Utilities Corporation
 Response to the Data Requests of
 The Bureau of Technical Utility Services
 Dated April 3, 2024
Docket No. A-2024-3047924**

TUS A-1 Reference the Letter of Notification, Attachment 2, page 3. The number of new and existing structures is not consistent with Table 2-1. Please reconcile.

PPL Response The “220” shown on Page 3 of Attachment 2 refers specifically to the number of COR-TEN® lattice towers on the line while the Table 2-1 (Page 5 of Attachment 2), depicts the total number of existing structures (235 total structures, comprised of 220 COR-TEN® lattice towers and 15 non-COR-TEN® structures) as well as the total number of proposed structures (232).

However, additional review revealed the overall structure count was inaccurate. The actual number of COR-TEN Structures and non-COR-TEN structures is 221 and 216 respectively. Please note, the total number of proposed structures remains unchanged (232). PPL Electric will file corrected information with the Commission to address this inaccuracy.

Updated Table 2-1: Existing and New Transmission Line Structures

Transmission Line	No. of Existing Structures	Existing Structure Height Range (feet)	Proposed No. of New Structures	Proposed Structure Height Range (feet)	Applicable Framing/ Specifications
HARWOOD-EAST PALMERTON AND SIEGFRIED-EAST PALMERTON 230 kV	237	55'-165'	232	60'-170'	7-009-043 7-009-061 7-009-062 7-009-064 7-009-013
Total	237		232		

WITNESS: Joseph B. Lookup

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TUS A-2 Reference the Letter of Notification, Paragraph 26. Please provide a copy of the RTR December 2023 and January 2024 Assessment.

PPL
Response Please see the attached **CONFIDENTIAL** RTR Energy Solutions, Inc. Corten Inspection Reports for the Harwood-East Palmerton and Siegfried-East Palmerton 230 kV Transmission Lines.

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TUS A-3 Reference the Letter of Notification, Attachment 1, Section 5.0. Please explain the significant cost difference between initial construction and the 45-year cost of service for the proposed solution.

PPL
Response The initial construction cost for the proposed solution to rebuild the 38 miles of the Harwood-East Palmerton and Siegfried-East Palmerton 230 kV lines is estimated at \$184.6 million while the cost of service over 45 years is estimated at \$568.7 million. The Cost of Service includes rebuild construction cost (depreciated over the life of the asset) and other routine activities such as general maintenance, inspections, and yearly vegetation maintenance over the life of the asset. The estimated costs are based on the historical costs for each of these activities across the PPL Electric transmission system plus yearly inflation.

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TUS A-4 Reference the Letter of Notification. Please explain whether the proposed project includes the replacement of any facilities on the Siegfried-East Palmerton installed as part of the Letter of Notification at Docket No. A-2019-3009112.

PPL
Response PPL Electric's proposed project does not include the replacement of any facilities on the Siegfried-East Palmerton #1 and #2 138/69 kV Transmission Lines installed as part of the Letter of Notification at Docket No. A-2019-3009112. The proposed Project only includes replacement of 230 kV facilities on the Harwood-East Palmerton and Siegfried-East Palmerton 230 kV Transmission Lines.

VERIFICATION

I, JOSEPH B. LOOKUP, being the Vice President of T&D Planning and Asset Management at PPL Services Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 04/15/2024


Joseph B. Lookup (Apr 15, 2024 13:04 EDT)

Joseph B. Lookup