

**PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Harrisburg, Pennsylvania 17120**

**PPL Electric Utilities Corporation**

**Public Meeting held November 7, 2024  
3049475-TUS  
Docket No. A-2024-3049475**

**MOTION OF VICE CHAIR KIMBERLY BARROW**

On June 7, 2024, PPL Electric Utilities Corporation (PPL) used the Commission's Letter of Notification (LON) process to apply to reductor a section of the Springfield – Gilbert 230 kV Transmission Line located in Springfield Township, Bucks County, Pennsylvania. The Springfield – Gilbert 230 kV line connects the PPL Electric owned Springfield 230-69 kV Substation in Bucks County, to the Jersey Central Power & Light owned Gilbert 230-115 kV Substation in Hunterdon County, New Jersey.

PPL states that reductoring a section of the Springfield – Gilbert 230 kV transmission line is necessary to resolve a thermal overload violation on the line. In November 2020, the New Jersey Board of Public Utilities (NJBPU) requested that PJM Interconnection LLC (PJM) open a competitive proposal window to solicit project proposals to identify transmission projects that address New Jersey's public policy goals for 7,500 MW of offshore wind into New Jersey by 2035.

In effect, the LON is for the purpose of a generator interconnection project, albeit a generator interconnection project backed by New Jersey's public policy.

I believe the LON should be granted for two reasons. First, in other generator interconnection contexts, like here, the utility and its ratepayers does not bear the costs of the upgrades. Although the present LON might be somewhat speculative because New Jersey's offshore wind is not yet ready to come online, in other generator interconnection LONs that the Commission has approved, the same has been true.<sup>1</sup> Transmission upgrades always precede the interconnection of generation. Because of that, the Commission may exercise discretion when reviewing the need for the project. The present LON is entirely within the utility's property and no new right-of-way is needed. Combined with the lack of ratepayer costs, the project meets the need standard under the Public Utility Code and the Commission's regulations.<sup>2</sup>

Second, the Commission supports the use of the PJM State Agreement Approach.<sup>3</sup> The present project is needed to support the public policy of another state, and we respect New Jersey's willingness to pay for the transmission facilities necessary to accomplish their policies. The State Agreement Approach saves money for those states who do not have the same public policies and aligns costs appropriately. The Commission should not impose unnecessary application requirements on those projects where there is little burden on Pennsylvania's

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<sup>1</sup> See e.g. Letter of Notification of Pennsylvania Electric Company, Docket No. A-2012-2286421 (Order entered March 29, 2012); Letter of Notification Filing of Mid-Atlantic Interstate Transmission, LLC, Docket No. A-2023-3043490 (Order entered January 18, 2024).

<sup>2</sup> 66 Pa.C.S. § 1103;52 Pa. Code 57.72.

<sup>3</sup> PJM Operating Agreement, Schedule 6, section 1.5.9.

interests. Approval of the project comports with the General Assembly's direction for the Commission to work with other states to encourage functional interstate power pools.<sup>4</sup>

**THEREFORE, I MOVE THAT:**

1. The Letter of Notification filed on June 7, 2024, by PPL Electric Utilities Corporation, is granted.
2. The Bureau of Technical Utility Services shall prepare an opinion and order consistent with this Motion.

A handwritten signature in black ink, appearing to read "Kim Barrow", written in a cursive style.

**November 7, 2024**

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**Kimberly Barrow, Vice Chair**

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<sup>4</sup> 66 Pa.C.S. § 2805.