

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
(800) 684-6560

@pa_oca
 /pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

December 4, 2024

Via Electronic Filing Only

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Application of PPL Electric Utilities Corporation under 15 Pa C.S. § 1511(c) for a finding and determination that the service to be furnished by the Applicant through its proposed exercise of the power of eminent domain to acquire a certain portion of the lands of Daniel T. Curran in Chanceford Township, York County, Pennsylvania for the proposed Chanceford Switchyard associated with the proposed Chanceford 500 kV Rebuild Project is necessary or proper for the service, accommodation, convenience, or safety of the public
Docket No. A-2024-3051213

Dear Secretary Chiavetta:

Attached for electronic filing, please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in this proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Darryl A. Lawrence

Darryl A. Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
DLawrence@paoca.org

Enclosures

CC: The Honorable Jeffrey A. Watson (email only: jeffwatson@pa.gov)
Office of Special Assistants (email only: ra-OSA@pa.gov)
Paul Diskin, TUS (email only: pdiskin@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

Application of PPL Electric Utilities Corporation :
under 15 Pa C.S. § 1511(c) for a finding and :
determination that the service to be furnished :
by the Applicant through its proposed exercise : A-2024-3051213
of the power of eminent domain to acquire a :
certain portion of the lands of Daniel T. Curran :
in Chanceford Township, York County, :
Pennsylvania for the proposed Chanceford :
Switchyard associated with the proposed :
Chanceford 500 kV Rebuild Project is necessary :
or proper for the service, accommodation, :
convenience, or safety of the public :

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 4th day of December, 2024.

SERVICE BY E-MAIL ONLY

Michael J. Shafer, Esq.
PPL Services Corporation
645 Hamilton Street, Suite 700
Allentown, PA 18101
mjshafer@pplweb.com
Counsel for PPL Electric Utilities Corp.

Alison C. Kaster, Esq., Director
Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
400 North Street, 2nd Floor West
Harrisburg, PA 17120
akaster@pa.gov
Counsel for BI&E

Nazaarah Sabree
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
ra-sba@pa.gov
Counsel for OSBA

David B. MacGregor, Esq.
Garrett P. Lent, Esq.
Nicholas Stobbe, Esq.
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
dmacgregor@postschell.com
glent@postschell.com
nstobbe@postschell.com
Counsel for PPL Electric Utilities Corp.

/s/ Darryl A. Lawrence
Darryl A. Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
E-Mail: DLawrence@paoca.org

Counsel for:
Patrick M. Cicero
Consumer Advocate

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
(717) 783-5048

Dated: December 4th, 2024

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of PPL Electric Utilities Corporation	:	
under 15 Pa C.S. § 1511(c) for a finding and	:	
determination that the service to be furnished	:	
by the Applicant through its proposed exercise	:	A-2024-3051213
of the power of eminent domain to acquire a	:	
certain portion of the lands of Daniel T. Curran	:	
in Chanceford Township, York County,	:	
Pennsylvania for the proposed Chanceford	:	
Switchyard associated with the proposed	:	
Chanceford 500 kV Rebuild Project is necessary	:	
or proper for the service, accommodation,	:	
convenience, or safety of the public	:	

NOTICE OF INTERVENTION, PUBLIC STATEMENT
AND REQUEST FOR PUBLIC INPUT HEARINGS
OF THE OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate (OCA) hereby gives Notice of Intervention in the captioned proceedings. The OCA deems it necessary to participate in this proceeding to protect the interests of PPL Electric Utilities Corporation's (PPL) customers. A copy of all correspondence and notices, documents, orders or other communications with respect to the captioned proceeding should be addressed to the undersigned counsel on behalf of the OCA.

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
(717) 783-5048

Counsel for:
Patrick M. Cicero
Consumer Advocate

Respectfully submitted,

/s/ Darryl A. Lawrence

Darryl A. Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
E-Mail: DLawrence@paoca.org

Dated: December 4, 2024

PUBLIC STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file a Notice of Intervention and participate in this proceeding before the Commission involving an investigation into whether the Commission should approve the three related filings made by PPL, as described herein.

On September 13, 2024, PPL filed an Application under 15 Pa C.S. Section 1511(c) for a finding and determination that the service to be furnished by the Applicant through its proposed exercise of the power of eminent domain to acquire a certain portion of the lands of Daniel T. Curran in Chanceford Township, York County, Pennsylvania for the proposed Chanceford Switchyard associated with the proposed Chanceford 500 kV Rebuild Project is necessary or proper for the service, accommodation, convenience, or safety of the public. The Application was filed with the Commission at Docket Number A-2024-3051213.

On September 13, 2024, PPL filed its Application pursuant to 52 Pa. Code Chapter 57 subchapter G, for approval to: (1) construct the new Three Mile Island – Chanceford 500 kV Transmission Line and Chanceford – Peach Bottom 500 kV Transmission Line and (2) rebuild the existing Otter Creek – Conastone 230 kV Transmission Line for future double circuit 500 kV operations as the rebuilt Chanceford – Doubs 500 kV Transmission Line and the rebuilt Otter Creek – Conastone 500/230 kV Transmission Line, located in Chanceford, East Hopewell, and Hopewell Townships in York County, Pennsylvania. PPL proposes to: (1) construct approximately 1.4 miles of new double circuit 500 kV transmission line, between the existing Three Mile Island

– Peach Bottom 500 kV Transmission Line to the proposed PPL Electric-owned kV switchyard, and (2) rebuild approximately 12 miles of the existing single circuit Otter Creek – Conastone 230 kV Transmission Line to a future double circuit 500 kV capacity. The Application was filed with the Commission at Docket Number A-2024-3051167.

On September 13, 2024, PPL filed its Petition for findings that a structure to shelter electrical and control equipment at the proposed Chanceford Switchyard in Chanceford Township, York County, Pennsylvania, is reasonably necessary for the convenience or welfare of the public, pursuant to 52 Pa. Code Section 5.41 and 53 P.S. Section 10619, for a finding that one structure to shelter electrical control equipment at the proposed PPL-owned 500 kV switchyard in Chanceford Township, York County, Pennsylvania, is reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance. The Petition was filed with the Commission at Docket Number P-2024-3051163.

The Consumer Advocate has determined that it is necessary to participate in these proceedings to protect the interests of PPL’s customers. The OCA will seek to ensure that each of these related filings will only be approved if they are found to be consistent with Commission regulations, the Public Utility Code and sound public policy. Due to the nature of this matter, and evidenced by the public’s past participation and interest in transmission line proceedings, the OCA requests that an in-person public input hearing be held in the affected service territory.