

COMMONWEALTH OF PENNSYLVANIA



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December 6, 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 Prehearing Conference Memorandum 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)
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 Prehearing Conference Memorandum, 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 6th day of December, 2024.

SERVICE BY E-MAIL ONLY

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Dated: December 6, 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 :
:
:

PREHEARING CONFERENCE MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to the Prehearing Conference Order issued on November 18, 2024, in the above-captioned proceeding, by the Administrative Law Judge (ALJ) Jeffrey A. Watson of the Office of Administrative Law Judge (OALJ) of the Pennsylvania Public Utility Commission (Commission), and pursuant to Section 333 of the Public Utility Code (Code), 66 Pa. C.S. Section 333, and the Commission’s regulations at 52 Pa. Code Sections 5.221-5.224, the Pennsylvania Office of Consumer Advocate (OCA) submits the following Prehearing Conference Memorandum.

I. INTRODUCTION

On September 13, 2024, PPL filed the captioned 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 (Application).

Also on September 13, 2024, in relation to the captioned Application, PPL filed with the Commission the following: (1) an Application at Docket Number A-2024-3051167 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 (Application); and (2) a separate Petition at Docket Number P-2024-3051163 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.

On December 4, 2024, the OCA filed a Notice of Intervention and Public Statement in the captioned Application docket and a separate Notice of Intervention and Public Statement in each of the two related docket numbers referenced above.

II. ISSUES

The OCA is participating in this proceeding to ensure that the interests of PPL's customers are protected. The OCA intends to investigate the need for this project through formal and informal discovery and will seek to ensure that the project will only be approved if it is consistent with the Public Utility Code, the Commission's regulations and relevant Pennsylvania law.

III. WITNESSES

At this time, the OCA has not retained a witness for this matter. In the event that the OCA retains a witness for this matter, the OCA will promptly notify ALJ Watson and all parties of record.

IV. PROPOSED SCHEDULE

The OCA will work with the ALJ and the parties to develop a procedural schedule. Given that the captioned Application and related filings referenced above will likely present common questions of fact and law, the OCA requests that the ALJ consolidate the three related proceedings at Docket Numbers A-2024-3051213, A-2024-3051167, and P-2024-3051163 in order to conserve administrative and party resources.

V. PUBLIC INPUT HEARINGS

The OCA requests that an in-person public input hearing be held in the area affected by this project. The OCA will work with ALJ Watson and the other parties to find an acceptable date for a one-day public input hearing to be held at 1:00 p.m. and 6:00 p.m.

VI. DISCOVERY

The OCA does not request any discovery rule modifications at this time.

VII. OCA COUNSEL / SERVICE ON THE OCA

The OCA will be represented in this case by the attorneys listed below:

Darryl A. Lawrence
Senior Assistant Consumer Advocate
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Harrisburg, PA 17101-1923
Email: DLawrence@paoca.org
(717) 580-9998

The OCA will accept email service without provision of a hard copy. To the extent that materials are available electronically, it is requested that copies be served upon all the following:

Darryl A. Lawrence, Esq., Senior Assistant Consumer Advocate, DLawrence@paoca.org; and
Lori A. Arnsperger, Paralegal, LArnsperger@paoca.org.

VIII. SETTLEMENT

The OCA will participate in settlement discussions in this matter.

Respectfully submitted,

/s/ Darryl A. Lawrence

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

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Counsel for:
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