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File #: 207395

December 9, 2024

VIA ELECTRONIC FILING

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

**Re: Application of PPL Electric Utilities Corporation Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval to (1) Construct The New Three Mile Island – Chanceford 500 kV 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 And 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
Docket No. A-2024-3051167**

**Petition Of PPL Electric Utilities Corporation For Findings That A Structure To Shelter Electrical And Control Equipment At The Proposed Chanceford Switchyard In Chanceford Township, Your County, Pennsylvania Is Reasonably Necessary For The Convenience Or Welfare Of The Public
Docket No. P-2024-3051163**

**Application Of PPL Electric Utilities Corporation Under 15 Pa C.S. 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**

Rosemary Chiavetta, Secretary
December 9, 2024
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Dear Secretary Chiavetta:

Attached for filing is the Prehearing Conference Memorandum of PPL Electric Utilities Corporation for the above-referenced proceedings.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Garrett P. Lent". The signature is written in a cursive style with a large initial "G".

Garrett P. Lent

GPL/dmc
Attachment

cc: The Honorable Jeffrey Watson (*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 E-MAIL ONLY

Darryl A. Lawrence, Esquire
Senior Assistant Consumer Advocate
Pennsylvania Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923
Email: Dlawrence@paoca.org

Allison Kaster, Esquire
Pennsylvania Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
2nd Floor, Room-N201
Harrisburg, Pennsylvania 17120
Email: Akaster@pa.gov

Nazaarah Sabree
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
ra-sba@pa.gov

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

Pennsylvania Department of Transportation
Commonwealth Keystone Building
400 North Street, Fifth Floor
Harrisburg, Pennsylvania 17120
Attn: Donald J. Smith, Acting Chief Counsel

York County Conservation District
2401 Pleasant Valley Rd Suite #101 Room
#139
York, PA 17402
Attn: Jeff Hill, District Manager

York County Planning Commission
28 E Market Street, 3rd Floor
York, PA 17401
Attn: Felicia Dell, Director
York County Commissioners
28 E Market Street
York, PA 17401

Chanceford Township Supervisors
33 Muddy Creek Forks Road
Brogue, PA 17309
Attn: Kent Heffner, Chairman

Chanceford Township Planning
Commission
33 Muddy Creek Forks Road
Brogue, PA 17309
Attn: John Shanbarger, Chairman

East Hopewell Township Supervisors
8916 Hickory Road
Felton, PA 17322
Attn: Dean Miller, Chairman

East Hopewell Township Planning
Commission
8916 Hickory Road
Felton, PA 17322
Attn: Melissa Hiller, Secretary

Hopewell Township Supervisors
3336 Bridgeview Road, PO Box 429
Stewartstown, PA 17363
Attn: Aaron R. Manifold, Chairman

Hopewell Township Planning Commission
3336 Bridgeview Road, PO Box 429
Stewartstown, PA 17363
Attn: Ann Yost, Chair

President of Metropolitan Edison Company
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 LLC
C/O Tori L. Giesler, Esq.
FirstEnergy Service Company
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P.O. Box 16001
Reading, PA 19612-6001

Daniel T Curran
13114 Collinsville Rd
Brogue, PA 17309

Date: December 9, 2024


Garrett P. Lent

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application Of PPL Electric Utilities :
Corporation, Filed Pursuant To 52 Pa. Code :
Chapter 57 Subchapter G, For Approval To : Docket No. A-2024-3051167
(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 :

Petition Of PPL Electric Utilities :
Corporation For Findings That A Structure :
To Shelter Electrical And Control : Docket No. P-2024-3051163
Equipment At The Proposed Chanceford :
Switchyard In Chanceford Township, York :
County, Pennsylvania Is Reasonably :
Necessary For The Convenience Or Welfare :
Of The Public :

Application of PPL Electric Utilities :
Corporation Under 15 Pa.C.S § 1511(c) For :
A Finding And Determination That The : Docket No. A-2024-3051213
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 :

**PREHEARING CONFERENCE MEMORANDUM OF
PPL ELECTRIC UTILITIES CORPORATION**

TO ADMINISTRATIVE LAW JUDGE JEFFREY A. WATSON

Pursuant to 52 Pa. Code § 5.224(c) and the November 18, 2024, Prehearing Conference Orders,¹ PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby submits this Prehearing Conference Memorandum.

I. SERVICE OF DOCUMENTS

1. PPL Electric requests that all documents be served on:

Garrett P. Lent, Esquire
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Harrisburg, PA 17101-1601
Phone: 717-731-1970
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E-mail: glent@postschell.com

Nicholas A. Stobbe, Esquire
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17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
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E-mail: nstobbe@postschell.com

Please be advised that Mr. Garrett P. Lent will speak as the lead attorney for PPL Electric for purposes of the December 10, 2024, prehearing conference. However, other counsel for PPL Electric will be participating and available during the telephonic prehearing conference as needed.

¹ Prehearing Conference Orders were issued at each of the three above-captioned dockets on November 18, 2024, all scheduling a telephonic Prehearing Conference for Docket Nos. A-2024-3051167, P-2024-3051163, and A-2024-3051213 with the same dial-in information. Thus, PPL Electric is filing this Prehearing Memorandum, as directed by the Prehearing Orders, at each of the aforementioned dockets.

2. PPL Electric agrees to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies be served upon, David B. MacGregor, Esquire at dmacgregor@postschell.com, and Michael J. Shafer, Esquire at mjshafer@pplweb.com.

II. PROCEDURAL HISTORY

3. These proceedings were initiated on September 13, 2024. On September 13, 2024, PPL Electric filed the following with the Pennsylvania Public Utility Commission (“Commission”):

- (a) Application of PPL Electric Utilities Corporation, 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 (hereinafter, the “Siting Application”).
- (b) 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 § 5.41 and 53 P.S. § 10619, for a finding that one structure to shelter electrical control equipment at the proposed PPL Electric owned 500 kilovolt 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 (hereinafter, the “Zoning Petition”).
- (c) Application 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 (hereinafter, the “Curran Application”).

4. The three proceedings identified above will collectively be referred to as the “Project.”

5. Through the Siting Application, PPL Electric PPL Electric proposes to (1) construct approximately 1.4 miles of new double circuit 500 kilovolt (“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.

6. The Project is required to resolve reliability issues on the 500 kV and 230 kV transmission systems operated by PJM Interconnection, LLC (“PJM”). The Project, as approved by PJM, includes Mid-Atlantic Interstate Transmission (“MAIT”) breaking the existing Three Mile Island – Peach Bottom 500 kV Transmission Line and extending both ends into the proposed 500 kV switchyard in Chanceford Township, York County. The proposed Chanceford Switchyard will consist of two 500 kV bays built for breaker-and-a-half operation that will initially operate in a three-breaker ring configuration. This configuration will create the new Three Mile Island – Chanceford 500 kV and Chanceford – Peach Bottom 500 kV Transmission Lines.

7. Through the Zoning Petition, PPL Electric requests authorization to exempt the construction of one structure to shelter electric control equipment from local zoning ordinance(s) in furtherance of the Project.

8. Through the Curran Application, PPL Electric seeks to exercise its eminent domain power in furtherance of the Project over the property of Daniel T. Curran.

9. A portion of the property proposed to be continued to be occupied by facilities associated with the Project, and in particular the Chanceford Switchyard, is located on land owned by Daniel T. Curran in Chanceford Township, York County, Pennsylvania. Through the Curran Application, PPL Electric requests a finding and determination—to the extent any such finding

and determination is determined to be necessary—that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right of way and easement over a certain portion of the Curran property for the construction of the public utility facilities associated with the Project is necessary or proper for the service, accommodation, convenience, or safety of the public.

10. On September 20, 2024, the Commission issued Initial Telephonic Prehearing Conference Notices, scheduling a Prehearing Conference on December 10, 2024, before Administrative Law Judge Jeffrey A. Watson (the “ALJ”).

11. On September 25, 2024, the Commission’s Secretary’s Bureau issued letters acknowledging receipt of the Siting Application, Zoning Petition, and Curran Application, respectively.

12. On October 4, 2024, the ALJ issued a Prehearing Orders at each of the above-captioned dockets which directed PPL Electric to publish notice of the prehearing conference and establishing deadlines to file protests and petitions to intervene.

13. On October 29, 2024, counsel for PPL Electric contacted the ALJ via email requesting modification of the October 4, 2024, Prehearing Order. Specifically, counsel requested direction from the ALJ regarding the required notice to be published pursuant to the October 4, 2024, as it had been communicated to PPL Electric there was only one newspaper of general circulation applicable to the impacted area.

14. Thereafter, PPL Electric filed a letter requesting modification of the October 4, 2024, Prehearing Order’s public notice requirements consistent with the request set forth in its prior e-mail.

15. On November 4, 2024, the ALJ issued second Prehearing Orders in response to PPL Electric's October 29, 2024, request, denying PPL Electric's request to modify the October 4, 2024, Prehearing Order, among other things.

16. On November 14, 2024, PPL Electric filed proofs of publication that showed Public Notice of these proceedings were published in both the York Daily Record and the York Dispatch on October 25, 2024, and November 1, 2024, respectively. PPL Electric's letter further explained that a miscommunication from the print advertising placement company used by PPL Electric to publish such notes led the Company to believe that the York Daily Record and the York Dispatch remained merged, leaving only one newspaper in general circulation in the Project's area. However, as evidenced by the proofs of publication, appropriate notice was published as directed in two newspapers of general circulation once per week for two consecutive weeks. Therefore, the issues identified in paragraphs 12-15 are moot.

17. On November 18, 2024, the ALJ issued Prehearing Conference Orders, directing the submission of Prehearing Memorandums by all parties on or before December 9, 2024, at 10:00 a.m.

18. On December 4, 2024, the Office of Consumer Advocate ("OCA") filed Notices of Intervention and Public Statements at all above-captioned dockets.

19. As of the date of submission of this Prehearing Memorandum, no other petitions to intervene, protests, answers, and/or other responsive pleadings have been filed at any of the above-captioned dockets or served upon PPL Electric.

20. Pursuant to 52 Pa. Code § 5.224(c) and the November 18, 2024, Prehearing Conference Order, PPL Electric hereby submits this Prehearing Conference Memorandum.

III. ISSUES

21. Through the Project, PPL Electric has requested Commission approval to: (1) construct a new double circuit 500 kV transmission line (the “Three Mile Island – Chanceford 500 kV Transmission Line” and the “Chanceford – Peach Bottom 500 kV Transmission Line”) for approximately 1.4 miles from the existing Three mile Island – Peach Bottom 500 kV Transmission Line² in Chanceford Township, York County to a proposed PPL Electric-owned 500 kV switchyard (“Chanceford Switchyard”); and (2) rebuild approximately 12 miles of the existing Otter Creek – Conastone 230 kV Transmission Line³ for future double circuit 500 kV capacity (the rebuilt “Chanceford – Doubs 500 kV Transmission Line” and the rebuilt “Otter Creek – Conastone 500/230 kV⁴ Transmission Line,” jointly referred to as the “Chanceford – Doubs 500 kV Rebuilt Line”⁵).

22. Further, the Project contemplates a requested zoning ordinance exemption in order to construct one structure to shelter electrical control equipment, which is needed to enclose and protect certain facilities and the contemplated Chanceford Switchyard, which will be constructed as part of the Project.

² Three Mile Island Substation is owned and operated by MAIT, a subsidiary of FirstEnergy. Peach Bottom Substation is owned and operated by PECO Energy Company, an Exelon Company.

³ The Otter Creek 230 kV Substation (“Otter Creek Substation”) is owned and operated by PPL Electric. Conastone Substation is owned and operated by Baltimore Gas And Electronic Company (“BGE”), and Exelon Company.

⁴ The rebuilt Otter Creek – Conastone 500/230 kV Transmission Line will initially continue to operate as the Otter Creek – Conastone 230 kV transmission line until load increases and the line is re-terminated into the proposed Chanceford Switchyard. Prior to the system conversion, the line will remain in its current name (*i.e.*, Otter Creek – Conastone 230 kV Transmission Line); after the conversion, it will be renamed to its final designation of Chanceford – Conastone 500 kV Transmission Line.

⁵ PPL Electric will be installing an electrical jumper connection between the Otter Creek – Conastone 230 kV Transmission Line and the future Chanceford – Doubs 500 kV Transmission Line. This jumper connection will be installed within the Pennsylvania section of transmission line and remain in place until the Chanceford – Doubs 500 kV circuit is ultimately ready for energization at its remote end (Doubs Substation in Maryland). The purpose of the jumper will be to operate and monitor both circuits of the transmission line (as the Otter Creek – Conastone 230 kV line segment), in an interim configuration, until ultimately forming the Chanceford – Doubs 500 kV Rebuilt Line at a later date.

23. Lastly, the Project contemplates a condemnation – to the extent one is necessary – to acquire a right-of-way and easement over a certain portion of the property of Daniel T. Curran for the construction of certain of the facilities as part of the Project.

24. The Project is necessary to address transmission reliability issues associated with data center load growth in the APS and Dominion service territories of the PJM system. As detailed in the Siting Application, PJM has identified a number of transmission line and transformer overloads, voltage deficiencies, and non-convergent contingencies that will result from this load growth. PJM sought proposals that develop robust, holistic and expandable solutions that address these 2027-28 baseline violations.

25. Further, PPL Electric intends to demonstrate that the Project is needed to address further anticipated load growth in the area.

26. In addition, the Company will show that the proposed Project complies with applicable statutes and regulations providing for the protection of the natural resources of this Commonwealth. PPL Electric will continue to consult with the jurisdictional agencies regarding potential impacts to protected species, complete all required surveys, obtain all necessary approvals and permits for Project construction, and comply with conditions placed on those permits.

27. Furthermore, PPL Electric intends to demonstrate that the Project will have a minimum adverse environmental impact considering the electric power needs of the public.

28. Finally, PPL will demonstrate that it has successfully obtained all required easements for the Project. The only parcel where all needed rights have not been acquired is owned by Daniel T. Curran. Despite having a valid easement to construct, operate and maintain, and from time to time reconstruct its electric lines within the right-of-way on the Curran property, there is no statutory authority for releasing the Curran property from its agricultural easement established

pursuant to Pennsylvania Agricultural Area Security Law, 3 P.S. § 901 *et seq.* This encumbrance is the impetus for the Curran Application.

IV. CONSOLIDATION OF PROCEEDINGS

29. The Commission’s regulations at 52 Pa. Code § 5.81 provide for the consolidation of proceedings. Section 5.81 provides:

(a) The Commission or presiding officer, with or without motion, may order proceedings involving a common question of law or fact to be consolidated. The Commission or presiding officer may make orders concerning the conduct of the proceeding as may avoid unnecessary costs or delay.

(b) Subsection (a) is identical to 1 Pa. Code § § 35.45 and 35.122 (relating to consolidation; and consolidation of formal proceedings).

30. Because the Siting Application, Zoning Petition, and Curran Application present common issues of law and fact, PPL Electric respectfully requests that Docket Nos. A-2024-3051167, P-2024-3051163, and A-2024-3051213 be consolidated for the purposes of litigation.

V. WITNESSES

31. PPL Electric presently intends to offer – and/or has already offered – the following witnesses to testify in these proceedings on the following subject matters, to the extent necessary:⁶

Siting Application – Docket No. A-2024-3051167

Witness	Subjects Addressed
Joseph B. Lookup Vice President – Transmission and Distribution Planning and Asset Management PPL Services Corporation 827 Hausman Road Allentown, PA 18104	General Description of Project Need for Project

⁶ Because PPL Electric included Direct Testimony as part of both the Siting Application and the Curran Application, the following tables are broken up by respective filing, *i.e.*, the Siting Application, the Zoning Petition, and the Curran Application.

Kyle Swartzentruber Lead Responsible Engineer PPL Services Corporation 827 Hausman Road Allentown, PA 18104	Engineering and Design Criteria Safety Considerations
Peter Sparhawk Senior Vice President, T&D Market Sector Lead, Earth and Environment WSP USA 350 Eagleview Boulevard, Suite 250 Exton, PA 19341	Proposed Route Environmental Assessment and Mitigation
Austin K. Weseloh Transmission Right of Way and Real Estate Supervisor PPL Services Corporation 827 Hausman Road Allentown, PA 18104	Right of Way and Easement Rights

The Company’s testimony, attachments and exhibits included in the Siting Application fully support the Siting Application.

Zoning Petition – Docket No. P-2024-3051163

Witness	Subjects Addressed
Joseph B. Lookup Vice President – Transmission and Distribution Planning and Asset Management PPL Services Corporation 827 Hausman Road Allentown, PA 18104	General Description of Condemnation Need for Condemnation
Kyle Swartzentruber Lead Responsible Engineer PPL Services Corporation 827 Hausman Road Allentown, PA 18104	Engineering and Design Criteria Safety Considerations

Peter Sparhawk Senior Vice President, T&D Market Sector Lead, Earth and Environment WSP USA 350 Eagleview Boulevard, Suite 250 Exton, PA 19341	Proposed Route Environmental Assessment and Mitigation
Austin K. Weseloh Transmission Right of Way and Real Estate Supervisor PPL Services Corporation 827 Hausman Road Allentown, PA 18104	Right of Way and Easement Rights Permitting and Real Estate

The Company’s Zoning Petition and associated appendices included in the filing fully support the Zoning Petition. While no testimony was submitted with the Zoning Petition, PPL Electric currently contemplates that the above-referenced witnesses will testify regarding the identified issues should the need arise.

Curran Application - Docket No. A-2024-3051213

Witness	Subjects Addressed
Joseph B. Lookup Vice President – Transmission and Distribution Planning and Asset Management PPL Services Corporation 827 Hausman Road Allentown, PA 18104	Need for Condemnation
Austin K. Weseloh Transmission Right of Way and Real Estate Supervisor PPL Services Corporation 827 Hausman Road Allentown, PA 18104	Description of Property PPL Electric Rights on Property Need for Condemnation Description of Project Traversing Property

32. PPL Electric also reserves the right to call and present additional witnesses and testimony as it deems necessary, and/or to address any issues that may arise during the course of the proceeding.

VI. DISCOVERY

33. To date, the OCA has propounded one set of formal discovery on PPL Electric.

34. At this time, PPL Electric does not propose any modifications to the standard timelines for discovery set forth in the Commission’s regulations. However, to the extent that the procedural schedule agreed upon by the parties necessitates modifications to the standard timelines for discovery, PPL Electric is willing to negotiate reasonable modifications to the standard timelines for discovery.

35. PPL Electric also encourages the use of informal discovery to expedite the discovery process.

36. Finally, PPL Electric proposes the use of electronic service of discovery responses.

VII. LITIGATION SCHEDULE

37. At this time, the only party other than PPL Electric to proceeding is the OCA.

38. PPL Electric and the OCA have engaged in discussions regarding the schedule for this proceeding. PPL Electric proposes that the following schedule be adopted, which it has preliminarily shared with the OCA:

Filing	September 13, 2024
Prehearing Conference	December 10, 2024
End of OCA Discovery Period	January 24, 2025 ⁷
Status Report to ALJ	January 31, 2025

Based upon the current status of the above-captioned dockets, i.e., there are currently no other intervenors and protestants involved in this proceeding, PPL Electric believes that it may be able

⁷ The end of the discovery period is based upon a determination that a Public Input Hearing is not necessary in this matter, as described below. If the ALJ determines that a Public Input Hearing should be scheduled, PPL Electric submits that the end of the discovery period should, alternatively, be 10 days after the date of the Public Input Hearing. Similarly, if a Public Input Hearing is scheduled, PPL Electric proposes to submit a status report to the ALJ 30-days after it is held. PPL Electric understands that the OCA agrees with this proposal if a Public Input Hearing is scheduled.

to resolve OCA's inquiries and concerns without the need for the submission of written testimony and a formal evidentiary hearing. The proposed schedule therefore provides for a period for discovery by OCA to occur and a deadline after that period for the parties to submit a status report to the ALJ indicating whether a further litigation schedule needs to be established and, if so, the parties' proposed schedule. If it is determined that no litigation schedule is needed, then PPL Electric intends to request by the deadline for this status report that the above-captioned matters be transferred to the Commission's Bureau of Technical Utility Services for review and disposition.

39. To the extent that other individuals intervene or become parties to the proceeding after the submission of this Prehearing Memorandum, but before the Prehearing Conference, counsel for PPL Electric will endeavor to communicate the proposed schedule to those individuals and determine their position with respect to the proposed schedule before the Prehearing Conference.

VIII. PUBLIC INPUT HEARINGS

40. In its December 6, 2024, Prehearing Memo, and its December 4, 2024, Public Statement, the OCA requested that the Commission host an in-person public input hearing at 1:00 p.m. and 6:00 p.m. at a presently undetermined date in the future.

41. PPL Electric submits that no public input hearings are necessary in these proceedings, based upon the current status of the docket, PPL Electric's pre-filing public outreach, and the nature of the transmission siting projects at issue.

42. As of the date of this Prehearing Memorandum, the OCA is the only intervenor. No other person or individual has sought to intervene or otherwise participate in these proceedings.

43. PPL Electric is also unaware of any substantial public interest in the Project, which is evidenced by the fact that no customers, landowners, advocacy groups, or governmental entities have intervened or filed protests in response to the Project beyond the OCA.

44. Indeed, PPL Electric has already completed substantial public outreach related to the Project. The public outreach approach for the Project included early stakeholder engagement; public notification, including landowner notifications and news releases; and in-person public open house meetings. PPL Electric's public outreach for the Project is more fully described in the Siting Application's Attachment 3 – Project Area Description. PPL Electric hosted two separate public open house meetings to provide information on the Project on January 25 and May 29, 2024. The January 25, 2024 public open house meeting was held between 6 p.m. and 8 p.m. at the Chanceford Township Building, located at 33 Muddy Creek Forks Road, Brogue, PA 17309. The May 29, 2024 public open house meeting was held between 6 p.m. and 8 p.m. at the New Bridgeville Fire Company, located at 2870 Furnace Road, Red Lion, PA 17356.

45. Additionally, PPL Electric has provided public notices in accordance with Section 69.3102 of the Commission's Interim Siting Guidelines, 52 Pa. Code § 69.3102. PPL Electric has

reached out to residents located immediately adjacent to PPL Electric's fee owned parcels and owners of properties that are crossed by the Line. Copies of the Siting Application were served upon landowners in accordance with 52 Pa. Code § 57.74.

46. A list of the landowners impacted by the Project was provided in the Siting Application's Attachment 5 – Agency and Landowner List. Further, PPL Electric has provided information regarding the Project to representatives of Chanceford, East Hopewell, and Hopewell Townships in York County, Pennsylvania. These entities have not objected to the proposed Project. Copies of the Siting Application were served on the governmental agencies, municipalities, and other public entities and organizations in accordance with 52 Pa. Code § 57.74. A list of these entities and organizations was provided in the Siting Application's Attachment 5 – Agency and Landowner List.

47. Under these circumstances, and where no public interest is apparent or evidenced upon the dockets, PPL Electric respectfully submits that in-person public input hearings should not be held when no public interest is apparent.

IX. SETTLEMENT

48. As of this time, no settlement discussions have been held. PPL Electric remains open and available for settlement discussions with the OCA and would support initiatives to begin settlement discussions at the earliest possible date.

Respectfully submitted,



Michael J. Shafer (I.D. # 205681)
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David B. MacGregor (I.D. # 28804)
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Date: December 9, 2024

Attorneys for PPL Electric Utilities Corporation