
Garrett P. Lent
Principal

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File #: 204033

June 12, 2025

VIA ELECTRONIC FILING

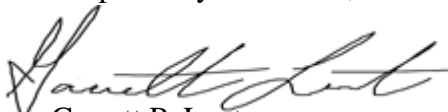
Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Letter Of Notification Of PPL Electric Utilities Corporation, Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G, For Approval To Rebuild Approximately 10.1 Miles Of Existing Single-Circuit 230 kV Transmission Line Between The Fox Hill 230 kV Substation And The Bushkill 230 kV Switchyard That Are Located In Monroe County, Pennsylvania
Docket No. A-2025-3054291**

Dear Secretary Homsher:

Attached, 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 III Data Requests regarding the above-captioned proceeding.

Respectfully submitted,



Garrett P. Lent

GPL/dmc
Enclosures

cc: Jordan Van Order, Esquire (*via email*)

**PPL Electric Utilities Corporation
Response to the Data Request of the
Bureau of Technical Utility Services
Dated June 2, 2025
Docket No. A-2025-3054291**

- A-14 Reference the Letter of Notification, Attachment 1, page 7.
Please explain whether structures outside of the described 2%
are at risk of catastrophic failure. If so, please provide a detailed
explanation as to why.
- PPL
Response Yes. As stated in the Letter of Notification, the Project is needed
to address asset health and reliability concerns associated with
the subject transmission line. With the exception of the five
structures closest to the Fox Hill Substation, which were
installed as part of the construction of the Fox Hill and Monroe
Substations in the mid-1990's and two structures immediately
adjacent to the Shawnee Substation, which were installed as
part of the construction of the substation in the 1970's, both
circuits were installed in the mid-1920s and are the oldest 230
kV transmission assets on the PPL Electric system. At
approximately 100 years old, the assets have exceeded their
life expectancy and are at risk for catastrophic failure.
Additionally, as mentioned in the Letter of Notification, the
structures classified as moderate are experiencing a buildup of
rust which will continue to weaken the steel, making them more
prone to failure. For the foregoing reasons, the structures
outside of the described 2% are at risk of catastrophic failure,
albeit a lower risk than the referenced 2%.

**PPL Electric Utilities Corporation
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Bureau of Technical Utility Services
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Docket No. A-2025-3054291**

A-15 Reference the Letter of Notification, Attachment 3, Figure 3-1. Please explain whether PPL Electric has addressed the concerns of Lawrence Wills at parcel 16731102688044 and provide a copy of the corresponding easement agreement.

PPL
Response PPL Electric responded to Dr. Wills on June 4, 2025, with a letter addressing his concerns. The June 4th letter is attached hereto as PPL Electric Response, A-15, Attachment 1. A copy of PPL Electric's easement over Dr. Wills property is attached hereto as PPL Electric Response, A-15, Attachment 2. PPL Electric's response to Dr. Wills is summarized below:

- PPL Electric has no record of construction or use of property outside of the right of way and work for the Project will occur within the right of way.
- Some minor disturbance due to temporary reconstruction is unavoidable. Any disturbances will be restored to substantially similar conditions present prior to the initiation of work. PPL Electric maintains the right under its easement to construct, operate, maintain, and reconstruct the transmission line.
- Working hours are typically between 7 AM and 7 PM. However, there may be extenuating circumstances which force work to occur outside of that timeframe. PPL Electric will attempt to limit work outside of the stated timeframe to the extent possible.
- Following construction, disturbed land will be restored in accordance with the approved Monroe County Conservation District permit.

Neil Horowski
Transmission - Right Of Way Specialist

PPL Electric Utilities
827 Hausman Rd
Allentown, PA 18104
Tel. 484.743.7480



June 4, 2025

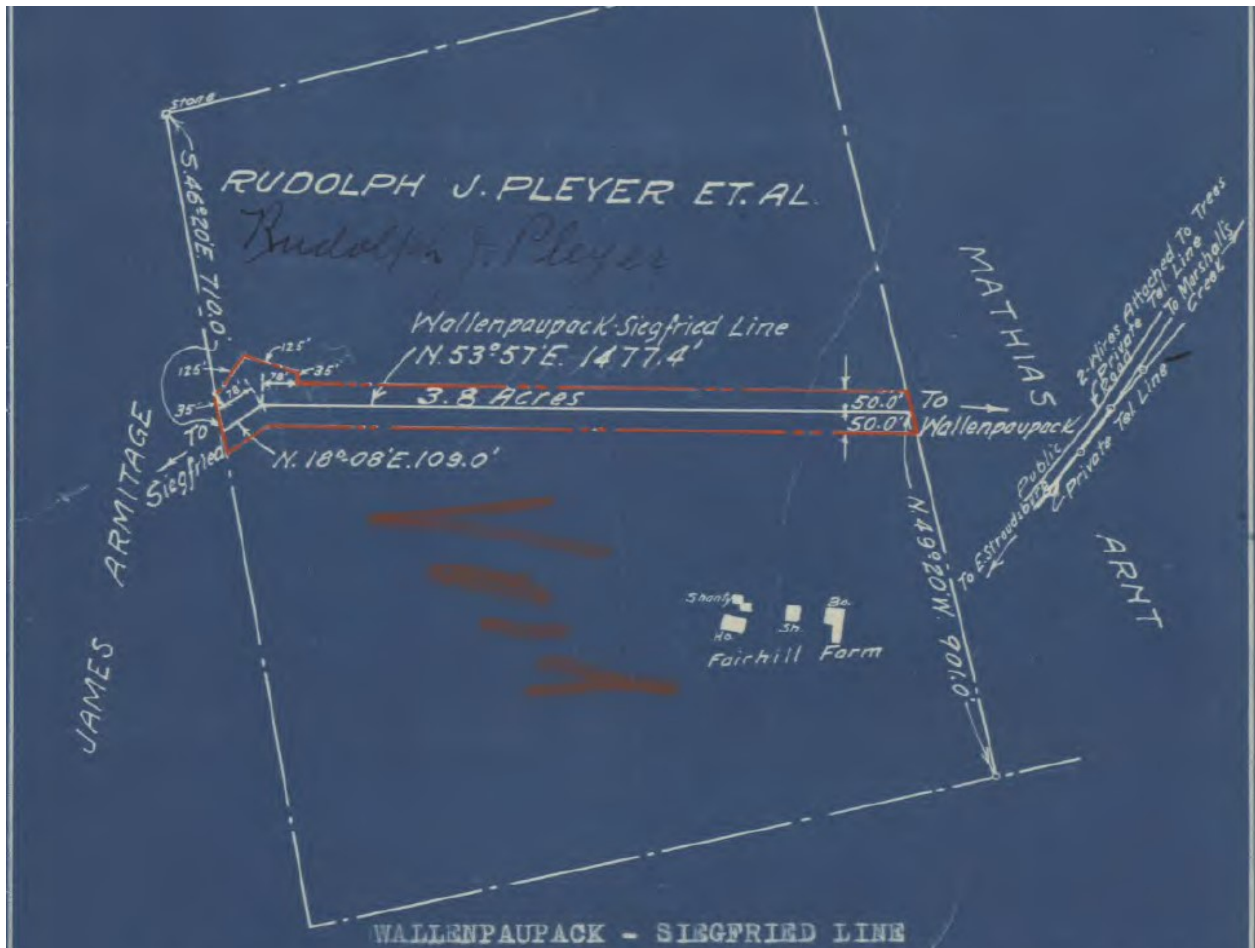
Dr. Lawrence A Wills
357 Harvest Hills Dr
North Bennington, VT 05257

Dr. Wills,

Please find below a response to your letter of notification to the Pennsylvania Public Utility Commission. PPL Electric responses are in blue.

1. A 1924 easement refers to a ROW of only "50 feet from a centerline." For about 100 years, it appears PPL has caused to be built and maintained use of property outside the easement as written. No apparent compensation has been offered or paid for actual use of lands outside the 1924 easement.

- PPL has no record of construction or use of property outside the 1924 easement area. The claim about the ROW width is inaccurate. PPL maintains a wider ROW on this current parcel, as shown on the exhibit, I included a screen shot below for



reference.

2. My parcel is included by reference and photo(s) within the March 28, 2025 plan, as Figure 3-1. Construction at or near my property, within the current easement, will damage the quality of life there.

- Some minor disturbance due to temporary reconstruction is unavoidable. PPL will restore the area at construction completion, in accordance with the permit issued by the local Conservation District. PPL maintains the right to reconstruct in the interest of maintaining a reliable electric grid for this location and the greater service territory.

3. During the past near 100 years of PPL's Occupation of this site, many cement and metal gross sized objects and structures have been installed and maintained by PPL or its agents. Should the "PPL plan be enacted, please be advised from our view, new construction vehicles or equipment are expected to work within and disturb "only" the land within the 1924 easement.

- The current construction plan is designed within the ROW on this parcel, so this should be a non-issue.

4. At the conclusion of such proposed construction the property owner fully expects that:

A. No portion of his lands will be disturbed, outside easement.

- The current construction plan is designed within the ROW on this parcel.

B. During construction, work will not disturb the property or its occupants outside of outdoor work beyond the normal 7 am to 7 pm hours.

- PPL occasionally works after 7pm in the Summer, if daylight permits, or if there are other restrictions that require night work. In this case, the project team should be able to accommodate the 7am-7pm request. PPL will plan to add this to our construction provisions which are passed along to the project team and contractors.

C. When work is fully completed within the easement, the easement will be replaced in its original natural state with local plants, trees and other vegetation plants.

- PPL does not replace/replant any specific plants, trees or other vegetation but will be reseeding the construction footprint with a seed mixture that is approved by the Conservation District, based on existing conditions.

D. All materials placed at premises since 1924 by PPL or agents will be removed, especially any anchors, concrete, metal structures, metal fittings and such, and land carefully restored in those areas. There are to be no "left behind" materials or any kind in the easement or on owner's premises.

- It is standard practice to remove all material and restore the property to a substantially similar condition in order to close out the permit with the Conservation District.

Please feel free to reach out with any further questions or concerns as the project progresses.

Best Regards,

Neil Horowski
Transmission – Right of Way Specialist
PPL Electric Utilities

Know all Men by these Presents, That

we, Marie Feiler and Herman Feiler husband of the said Marie Feiler in consideration of the sum of One Dollar (\$1.00) to us paid at the date hereof by

the further sum of Six hundred (600) Dollars, to be paid to us when the rights hereby granted are exercised by the said Company

hereby, for ourselves heirs, executors, administrators and assigns irrevocably grant and convey unto the said Pennsylvania Power & Light Company, its successors, assigns and lessees, the right to construct, operate and maintain, and from time to time to reconstruct its electric lines, including such poles, towers, wires, fixtures and apparatus as may be from time to time necessary for the convenient transaction of the business of the said Company, its successors, assigns and lessees, upon, across, over and along the property which we own, or in which we have any interest, in the

Township of Smithfield County of Monroe, State of Pennsylvania.

and upon, across, over and along the roads, streets and highways adjoining the said property, as shown on the plan hereto attached and made a part hereof, including the right of ingress and egress to and from the said lines at all times for any of the purposes aforesaid, together with the right to set and maintain the necessary guy and brace poles or towers and anchors, and to attach thereto the necessary guy wires.

And, in consideration of the said payments, we do hereby covenant and agree for ourselves and our heirs, executors, administrators, successors and assigns, to and with the said

Pennsylvania Power & Light Company, its successors, assigns and lessees, that no house, barn, other structure, or inflammable or explosive materials of any kind shall be built or stored on said property within a distance of one hundred feet from the electric lines to be constructed over the way hereby granted.

And further, in consideration of said payments, we hereby release and quit claim the said

Pennsylvania Power & Light Company, its successors, assigns, and lessees, of and from any and all damages, loss or injury that may be at any time caused by or result from the construction, reconstruction, operation and maintenance of the said lines,

or the trimming or cutting down of any and all trees which, in the judgment of the said Company, its successors, assigns or lessees, may interfere with the construction, reconstruction, maintenance or operation of the said lines or menace the same.

Witness our hand and seal this 4th day of September, 1924

Sealed and delivered in the presence of

David L. Mummie

Rudolph J. Peyer (SEAL)
H. Pfeiffer (SEAL)
Marie Feiler (SEAL)
Herman Feiler (SEAL)
Mary Feiler (SEAL)



Received October 31, 1924, of Pennsylvania Power & Light Company the sum of Six hundred (600) Dollars, in full payment of the consideration above mentioned.

Herman Feiler
Mary Feiler
Rudolph J. Peyer

STATE OF PENNSYLVANIA, COUNTY OF Monroe, ss:

On the 1st day of September, 1924, before me, the subscriber, came the above named Rudolph J. Peyer, Herman Feiler and their act and deed, and desired the same to be recorded as such.

Witness my hand and official seal the day and year aforesaid.

David L. Mummie Notary Public My commission expires

Vertical text on the right margin: LIND # 71731 \$ 31829 PP&L CO. - CORPORATE FILES

Vertical handwritten text on the left margin: 202

R. J. Peyer } August
Wm. Pfeiler } from Pfeiler
Herman Pfeiler } make
Herman Pfeiler } Herndon
J. Pfeiler } Pfeiler
J. Pfeiler } Pfeiler

see 25-25

82-297

1600-377

Rudolph J. Peyer et al.

Anna Probst Sig et Co.

Entered Nov. 18. 1924

Recorded in the Office for Recording of Deeds in and for

Monroe

County

in Deed Book

No. 92

Page

480

, etc.

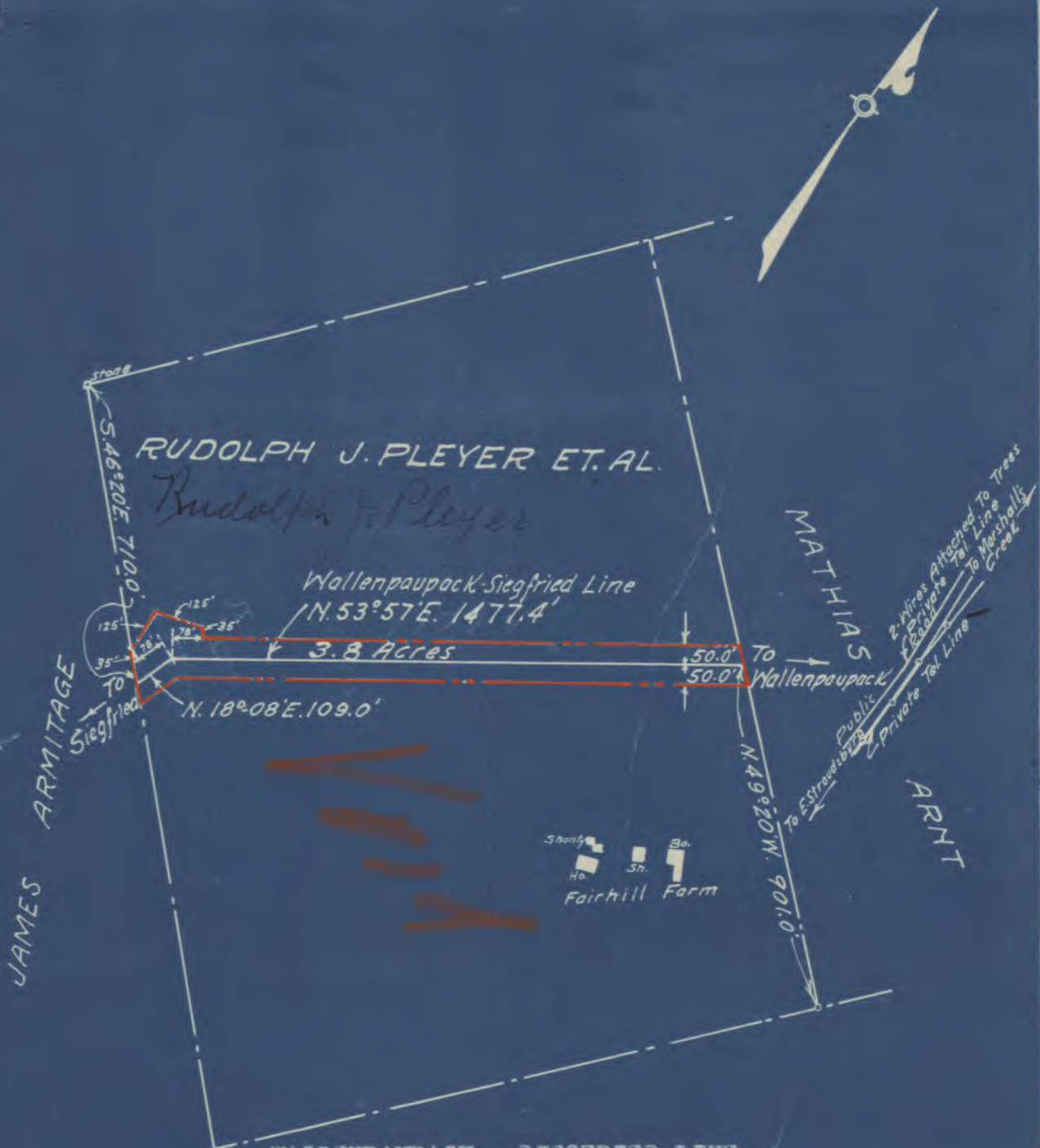
Witness my hand and seal of Office this

eighteenth

day of November, Anno Domini 19

24.

Harry M. Schoch
Recorder



NO.	DATE	REVISION	BY	CH.	APP.

WALLENPAUPACK - SIEGFRIED LINE

PLAN SHOWING TRANSMISSION LINE RIGHT OF WAY OVER PROPERTY OF
RUDOLPH J. PLEYER ET AL, SMITHFIELD TWP., MONROE COUNTY, PA.

SCALE 1" = 400'

APPROVED

L. G. Regue 10/30/24
S.P.C.

OCT. 30, 1924.

CHIEF ENGINEER

PENNSYLVANIA POWER & LIGHT COMPANY,

ALLENTOWN, PENNA.

LA-4455

DRAWN BY	PEW 10-6-24
TRACED BY	UMM 10-30-24
CHECKED BY	FKK 10-30-24
CORRECT	10/30/24
APPROVED	10/30/24

**PPL Electric Utilities Corporation
Response to the Data Request of the
Bureau of Technical Utility Services
Dated June 2, 2025
Docket No. A-2025-3054291**

A-16

Reference TUS Data Requests, Response to A-13. Please state the probability of a catastrophic failure of a transmission structure and the approximate length of time until such failure becomes likely.

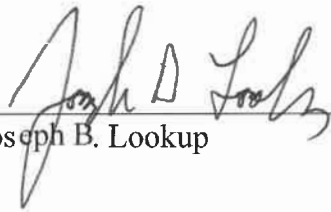
PPL
Response

Any asset placed in service is expected to have a serviceable life, with the expectation that it will reach the end of its useful life after a certain point. The “end of life” point can be driven by many factors, including the asset’s age, design, material, environment, vintage, manufacturer, maintenance history, and other relevant factors, making it difficult, if not impossible, to accurately determine the probability of a catastrophic failure of a transmission structure. However, the “end of life” of an asset can be defined as the age when the facility exhibits a significant and sustained increase in maintenance costs with a higher likelihood of component failure. To prevent failures from occurring on its system, PPL Electric plans for replacement as the asset is approaching or has surpassed its useful lifespan. At approximately 100 years old, the assets have exceeded their life expectancy. Given the assets’ advanced age and degree of deterioration, they are at a heightened risk for failure, especially under combined wind and ice conditions.

VERIFICATION

I, JOSEPH B. LOOKUP, being the Vice President – Transmission & Distribution 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: June 12, 2025



Joseph B. Lookup