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VIA E-FILE

July 7, 2025

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Letter of Notification of PPL Electric Utilities Corporation to Reconstruct the Fox Hill-Shawnee and Shawnee-Bushkill 230 kV Transmission Lines in Monroe County, Pennsylvania
Docket No. A-2025-3054291

Dear Secretary Homsher,

Enclosed for filing on behalf of PPL Electric Utilities Corporation is a supplemental response to A-18 from the Set IV data requests issued by the Bureau of Technical Utility Services in the above-referenced matter.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on July 7, 2025, which is the date it was filed electronically using the Commission's E-filing system.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

Michael J. Shafer

Enclosure

cc via email: Jordan Van Order

WITNESS: Joseph B. Lookup

PPL Electric Utilities Corporation
Response to the Data Request of the
Bureau of Technical Utility Services
Dated June 16, 2025
Docket No. A-2025-3054291

A-18

Reference TUS Data Requests, Response to A-14. Please explain whether the buildup of rust is occurring in areas other than the grillage foundations with failed coatings. Additionally, please explain whether other structural issues exist above grade on the subject transmission structures. If so, please provide a detailed explanation.

PPL Response

The inspections referenced in LON Paragraph 25 (A-1 Osmose Inspection Report) and Paragraph 26 (A-2 Third Party Inspection Report) identified rust accumulation at the base of the structures above grade, not just at the groundline of the grillage foundations. The inspections were performed at the groundline level but included all visual deficiencies observed from that vantage point.

As stated in Attachment 1, Section 4.2.1 - Asset Health, the grillage foundation design includes a concrete slab buried approximately eight feet below grade, resulting in a significant amount of structural tower steel in direct contact with the soil well below the groundline. Groundline corrosion compromises the structural integrity of the tower, increasing the risk of catastrophic tower failure. For this reason, the identified groundline corrosion poses an imminent threat to the integrity of the full structures, and additional inspections to identify issues beyond the detected rust further up the structures were not pursued.

PPL Supplemental Response

Protective coatings are commonly employed to prolong the service life of structural steel by serving as a barrier against corrosion. These remedial coatings mitigate section loss and the associated reduction in structural strength by inhibiting the initiation and progression of corrosion.

However, it is important to note that such coatings do not prevent corrosion and therefore cannot ensure an indefinite lifespan. Their effectiveness may be compromised by several factors, including but not limited to:

- Poor adhesion resulting from pre-existing corrosion on the substrate;
- Exposure to harsh environmental conditions;
- Mechanical or physical damage to the coating surface; and
- Ongoing corrosion, as no coating is entirely impermeable.

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: July 7, 2025

Joseph B. Lookup