

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17120**

Public Meeting held July 24, 2025

Commissioners Present:

Stephen M. DeFrank, Chairman  
Kimberly Barrow, Vice Chair  
Kathryn L. Zerfuss  
John F. Coleman Jr.  
Ralph V. Yanora

Letter of Notification of PPL Electric Utilities Corporation for approval to reconstruct the Montour – Saegers 230 kV Transmission Line located in Anthony and Derry Townships, Montour County, Lewis Township, Northumberland County, and Clinton and Muncy Creek Townships, Lycoming County, Pennsylvania

Docket Number:  
A-2025-3055194

**ORDER**

**BY THE COMMISSION:**

On May 15, 2025, PPL Electric Utilities Corporation (PPL Electric), Utility Code 110500, filed a Letter of Notification pursuant to 52 Pa. Code § 57.72(d)(1)(i) of the Pennsylvania Public Utility Commission’s (Commission) transmission line siting regulation. For the reasons expressed in this Order, the Letter of Notification is approved.

Copies of the Letter of Notification were served in accordance with Section 57.72(d)(3) and 57.74(b) & (c), 52 Pa. Code §§ 57.72(d)(3), 57.74(b) & (c). No protests were filed. No hearings were held.

PPL Electric requests approval to reconstruct the Montour – Saegers 230 kV Transmission Line located in Anthony and Derry Townships, Montour County, Lewis Township, Northumberland County, and Clinton and Muncy Creek Townships, Lycoming County, Pennsylvania. The line proposed to be rebuilt connects the Montour 230-69 kV Substation located in Montour County and the Saegers 230-69 kV Substation located in Lycoming County. Application page 1.

PPL Electric states that the reconstruction of the Montour – Saegers line is necessary to resolve significant asset health condition concerns across the double-circuit transmission line associated with the presence of pack-out rust in the existing COR-TEN steel lattice towers. PPL Electric also states that the Montour – Saegers transmission line was constructed in the early 1970s and includes 37 weathering-steel COR-TEN lattice structures and 74 steel monopoles spanning approximately 12.7 miles. PPL Electric further states that COR-TEN lattice towers were commonly installed by the industry during this time because it was believed that the corrosion-resistant properties of weathering-steel would reduce future maintenance needs and costs. Lastly, PPL Electric states that these towers had an expected service life of approximately 75 years at the time they were installed. Application ¶¶9, 17, and PPL Electric Data Request Response No. 11.

PPL Electric submits that independent field investigations and assessments were conducted in 2013 and 2019 on PPL Electric’s 230 kV system and in 2024 on the Montour – Saegers transmission line. PPL Electric submits that the investigations and assessments were conducted by separate third party entities and revealed that the aging COR-TEN structures on the 230 kV system including the Montour – Saegers transmission line facilities

are showing signs of accelerated deterioration. PPL Electric also submits that based on the results of these assessments, the issue with COR-TEN lattice towers has accelerated the deterioration of these structures and has brought the assets to the end of their service life much sooner than would have been anticipated. PPL Electric further submits that at roughly 50 years of age, the COR-TEN lattice towers that comprise the Montour – Saegers line have exceeded their useful life and can no longer be relied upon to safely operate as designed. Application ¶¶20, 23, & 25.

PPL Electric states that the steel poles typically have an average estimated useful life of 50-60 years and that all but three of the monopoles proposed to be replaced are 54 years in age. PPL Electric’s response to TUS data requests provides that visual inspections were completed in 2019 and identified chipping of the lead-based paint coating on the structures as the only issue. PPL Electric states that damage to this protective coating leaves the structure vulnerable to corrosion caused by atmospheric conditions. PPL Electric Response to Data Request No. 9.

PPL Electric submits that the asset health concerns discovered by the 2013 assessment were heightened by the discovery of pack-out rust in the section joints of the subject COR-TEN lattice towers. PPL Electric also submits that when the presence of pack-out rust becomes too severe, it can deform steel members and connecting hardware, it can also shear off bolts, cause loss of structural integrity, cause members to disconnect from the tower, and even result in tower failure. PPL Electric further submits that this now well-known inherent problem with COR-TEN steel is also being seen in other infrastructure where two pieces of COR-TEN steel overlap at joints, such as those present on lattice towers. Application ¶19.

PPL Electric states that the accelerated deterioration of the asset health of the COR-TEN lattice towers has been further corroborated by a recent study prepared by RTR

Energy Solutions, Inc. (RTR), in early 2024. PPL Electric states that RTR was contracted to perform a condition assessment on the Montour – Saegers transmission line. The sample set for the assessment consisted of all 37 of the COR-TEN structures on this line. PPL Electric states that of the structures evaluated on the Montour – Saegers line, 78% were determined to have a condition rating of severe, which indicates that greater than 50% of the existing structure’s joints contain pack-out rust. PPL Electric further states that the majority of pack rust observed on each structure was found in the lower sections of the post leg where horizontal and diagonal members are bolted to the post leg. Application ¶¶23 and Attachment 1, page 12.

PPL Electric submits that in order to resolve the identified COR-TEN lattice tower health conditions, it proposes to rebuild the existing Montour – Saegers transmission line. PPL Electric submits that the reconstruction project includes removing the existing COR-TEN transmission structures and existing conductor and rebuilding the Montour – Saegers line as a 230 kV transmission line. PPL Electric submits that it presented its plan to address COR-TEN needs on its 230 kV system at PJM’s October 2020, Transmission Expansion Advisory Committee. Finally, PPL Electric submits that the presentation included the reconstruction of the Montour – Saegers line and was subsequently assigned supplemental project number s2370. Application ¶¶31-32.

PPL Electric states that, in addition to rebuilding the Montour – Saegers transmission line, it considered three alternative solutions: partial structure replacement with full reconductor, structure restoration, and partial structure replacement with partial reconductor. PPL Electric states that the estimated total cost of ownership over a 45-year period for the three alternative solutions is approximately \$230.3 million, \$256.1 million, and \$181.6 million, respectively. Application, Attachment 5.0.

Accordingly, PPL Electric submits that the three alternatives were rejected for a solution which addresses the aging infrastructure in a more cost-effective manner. PPL Electric further states that the 45-year cost of the chosen solution is approximately \$180.8 million. The estimated cost for the alternatives was developed based on preliminary engineering and by using averages of recent costs for similar projects without an in-depth analysis of field investigation or completion of detailed engineering. Finally, PPL Electric submits that using this methodology the estimated cost for the proposed solution is approximately \$57.9 million. Application Attachment 1, Sections 5.0, 5.4, & 6.0 and PPL Electric Data Request Response No. 12.

PPL Electric states that it will remove the 37 existing COR-TEN structures and 71 non-COR-TEN structures and install 108 new steel pole structures. PPL Electric states that the existing structures range from approximately 80 feet in height to 175 feet in height and the new steel structures will range from approximately 95 feet in height to 180 feet in height. PPL Electric also states that the new transmission structures are anticipated to have a service life of approximately 75 years. Finally, PPL Electric states that the new conductors for the Montour – Saegers line will be six 1590 kcmil, 54/19 stranding, “Falcon” Aluminum Conductor Steel Supported (ACSS). Application, Attachment 1, page 9, Attachment 2, Section 2.0, and PPL Electric Response to Data Request No. 9.

In its filing, PPL Electric states that the reconstruction project has been designed and will be built entirely within the existing right-of-way of the Montour – Saegers and that the rebuilt line will be slightly offset from the existing alignment. PPL Electric also states that the right-of-way generally varies from approximately 100 feet in width to approximately 150 feet in width. Finally, PPL Electric states that the existing number of structures on each parcel will not change, and that no new structures will be added to properties that do not currently have a structure. Application ¶¶38-39.

PPL Electric asserts that the reconstruction project will be designed, constructed, operated and maintained in a manner that meets or surpasses all applicable PPL Electric and National Electrical Safety Code minimum standards and all applicable legal requirements. Application ¶36.

PPL Electric states that the total estimated cost for the proposed Montour – Saegers full reconstruction project is approximately \$65 million and will be paid for by PPL Electric. Construction of the project is anticipated to commence in August 2025 with a proposed in-service date of February 2027. Application, Attachment 1, page 2.

Section 57.72 authorizes the abbreviated Letter of Notification siting application process in lieu of an application for the following:

- (i) An HV line which is proposed to be located entirely on an existing transmission line right-of-way, so long as the size, character, design, or configuration of the proposed HV line does not substantially alter the right-of-way.
- (ii) An HV line which is proposed to be located entirely within a public road.
- (iii) An HV line which is proposed to be located entirely within applicant's existing transmission line right-of-way and the property of the sole customer to be served by the line, so long as the size, character, design, or configuration of the proposed HV line does not substantially alter the right-of-way.
- (iv) A line for which the voltage is proposed to be increased above its present levels so long as the size, character, design, or configuration of the proposed HV line does not substantially alter the right-of-way.

- (v) An HV line which is to be reconducted or reconstructed so long as the size, character, design, or configuration of the proposed HV line does not substantially alter the right-of-way.
  
- (vi) An HV line having a proposed route of 2 miles or less.

52 Pa. Code § 57.72(d).

We agree with PPL Electric that the formal PPL Electric Letter of Notification and manner in which it was filed conforms to the requirements of 52 Pa. Code § 57.72(d)(1)(i) because the project reconstructs the Montour – Saegers 230 kV Transmission Line in such a manner that it does not substantially alter the existing right-of-way.

We note that this is not the first time this Commission has been presented with issues regarding PPL’s COR-TEN transmission infrastructure, having approved an PPL LON filing on March 27, 2025, regarding similar issues on the Company’s Mountain – Jenkins – Stanton 230 kV Transmission Line. Given the clear risk presented by the health conditions of the COR-TEN structures on the Montour Line, the fact that the majority of steel monopoles on the Montour Line are at the end of their useful life, along with the costs associated with the proposed LON when compared to its alternatives, we find approval of this LON to be necessary and in the public interest.

We note that our approval of the Letter of Notification does not address the issues of accounting treatment, and cost recovery; **THEREFORE,**

**IT IS ORDERED:**

1. That the Letter of Notification filed by PPL Electric Utilities Corporation for approval to reconstruct the Montour – Saegers 230 kV Transmission Line located in Anthony and Derry Townships, Montour County, Lewis Township, Northumberland County, and Clinton and Muncy Creek Townships, Lycoming County Pennsylvania, is hereby approved.

2. That upon completion of the subject project, PPL Electric Utilities Corporation shall file the final project cost with the Commission.

3. That upon completion of Ordering paragraph 2, this proceeding at Docket No. A-2025-3055194 be closed.

**BY THE COMMISSION,**



Matthew L. Homsher  
Secretary

ORDER ADOPTED: July 24, 2025

ORDER ENTERED: July 29, 2025