
Garrett P. Lent
Associate

glent@postschell.com
717-612-6032 Direct
717-731-1979 Direct Fax
File #: 213790

August 25, 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: Petition for Waiver of PPL Electric Utilities Corporation
Docket No. P-2025-3056867**

**Letter Of Notification Of PPL Electric Utilities Corporation, Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G, For Approval To Build Approximately 1.5 Miles Of New Single Circuit 230 kV Transmission Line To Connect the Existing Susquehanna 230 kV Switchyard to the Existing Customer-Owned 230-69 kV Substation, To Build A New Single Circuit 0.2-Mile-Long 500 kV Transmission Line From the Susquehanna 500 kV Switchyard To An Existing Customer-Owned Substation, and To Build A New Double Circuit 0.4-Mile-Long 230 kV Transmission Line From The Susquehanna T10 230 kV Switchyard To A New Customer Owned 230-34 kV Substation Located in Luzerne County, Pennsylvania
Docket No. A-2025-3056806**

Dear Secretary Homsher:

Enclosed, 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 I Data Requests regarding the above-captioned proceeding.

Copies are being provided as indicated on the Certificate of Service.

Matthew Homsher, Secretary
August 25, 2025
Page 2

Respectfully submitted,



Garrett P. Lent

GPL/dmc
Enclosures

cc: Jordan Van Order (*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 § 1.54 (relating to service by a participant).

VIA FIRST-CLASS MAIL

Pennsylvania Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor, Room-N201
Harrisburg, Pennsylvania 17120
Attn: Allison Kaster

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
Keystone Building
400 North Street, Ninth Floor
Harrisburg, Pennsylvania 17120
Attn: Jeffrey Spotts, Chief Counsel

Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, Second Floor
400 North Street
Harrisburg, Pennsylvania 17120-0093
Attn: Ms. Emma Diehl, Division Manager

Pennsylvania Department of Conservation and Natural Resources
Rachel Carson State Office Building
400 Market Street
Harrisburg, Pennsylvania 17105-8767
Attn: Rebecca Bowen, Ecological Services Section Chief

Pennsylvania Game Commission
2001 Elmerton Avenue
Harrisburg, Pennsylvania 17110-9797
Attn: David Gustafson, Director, Bureau of Wildlife Habitat Management

Pennsylvania Fish and Boat Commission
450 Robinson Lane
Bellefonte, Pennsylvania 16823-9620
Attn: Christopher A. Urban, Chief, Natural Diversity Section

Pennsylvania Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923
Attn: Darryl A. Lawrence, Interim Acting Consumer Advocate

Pennsylvania Office of Small Business Advocate
555 Walnut Street
1st Floor Forum Place
Harrisburg, Pennsylvania 17101
Attn: Steven C. Gray, Senior Supervising Assistant Small Business Advocate

U.S. Army Corps of Engineers
Baltimore District
2 Hopkins Plaza
Baltimore, Maryland 21201
Attn: Public Affairs Office

U.S. Fish and Wildlife Service
Pennsylvania Field Office
110 Radnor Road, Suite 101
State College, Pennsylvania 16801
Attn: Lesa Lindsay

Luzerne County Conservation District
325 Smiths Pond Rd
Shavertown, Pennsylvania 18708
ATTN: Josh Longmore, Executive Director

Luzerne County Planning Commission
Luzerne County Courthouse
200 N River Street
Wilkes-Barre, Pennsylvania 18711
ATTN: N. Brian Caverly, Luzerne County
Planning Commission Chair

Salem Township
38 Bomboy Lane
Berwick, Pennsylvania 18603
ATTN: Ernest Ashbridge III, Chairman

Conyngham Township
10 Pond Hill Mtn. Road
Mocanaqua, Pennsylvania 18655
ATTN: Edward Whitebread, Chairman

Cumulus Data LLC
600 Hamilton St
Allentown, Pa
18101-2130

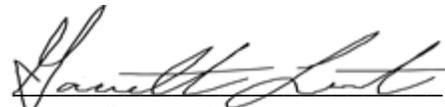
Cumulus Real Estate Holdings LLC
Marc A Jackson Real Estate & Property
Management
600 Hamilton St
Allentown, Pa
18101-2130

Susquehanna Data LLC
600 Hamilton St
Allentown, Pa
18101-2130

Susquehanna Nuclear LLC
600 Hamilton St
Allentown, Pa
18101-2130

Norfolk Southern Railway Co
Taxation Department
650 W Peachtree St NW
Atlanta, Ga
30308-1925

Dated: August 25, 2025



Garrett P. Lent

PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025

Q. A-1. Reference the Letter of Notification, page 2. Please file a petition for waiver of the Commission's regulations at 52 Pa. Code § 57.72(d)(1)(vi).

A. A-1. Please see pages 2-3 of the Letter of Notification, which state:

PPL Electric maintains that the proposed Project qualifies for use of a Letter of Notification because each of the component HV lines have a proposed route of two miles or less. In addition, the total line length of each of the component HV lines together is only 2.1 miles. Approval to site and construct each of these component HV transmission line could appropriately be sought in separate Letters of Notification; however, given that each of the component HV transmission lines serves the same customer and addresses the same need, PPL Electric has requested approval of all of these lines as a part of this Letter of Notification. To the extent that waiver of the Commission's regulations is required in order for the Project to proceed as a Letter of Notification—and PPL Electric submits that it is not—PPL Electric respectfully requests that the Commission waive 52 Pa. Code § 57.72(d)(1)(vi) and any additional waivers necessary to determine that the Project qualifies to proceed as a Letter of Notification because each of the component HV lines has a length of less than two miles.

In addition, please see Letter of Notification, Section VII, and in particular, paragraph 83, which states:

The proposed Project qualifies for use of a Letter of Notification because each of the component HV lines have a proposed route of two miles or less. In addition, the total line length of each of the component HV lines together is only 2.1 miles. Approval to site and construct each of these component HV transmission line could appropriately be sought in separate Letters of Notification; however, given that each of the component HV transmission lines serves the same customer and addresses the same need, PPL Electric has requested approval of all of these lines as a

WITNESS: Joseph Lookup

part of this Letter of Notification. To the extent that waiver of the Commission's regulations is required in order for the Project to proceed as a Letter of Notification—and PPL Electric submits that it is not—PPL Electric respectfully requests that the Commission waive 52 Pa. Code § 57.72(d)(1)(vi) and determine that the Project qualifies to proceed as a Letter of Notification because each of the component HV lines has a length of less than two miles.

As explained in this Letter of Notification, the work to be completed by PPL Electric involves several HV transmission line segments that are each individually under 2 miles in length. Moreover, all of the work to be completed is driven by the same need case and is intended to serve the same customer. For these reasons, rather than submit separate letters of notification for each line segment, PPL Electric proceeded under the instant Letter of Notification.

Pursuant to Section 57.72(e) of the Commission's regulations, one or more of the Commission's siting requirements may be waived. Section 57.72(e) provides as follows:

The Commission or the presiding officer may -- upon the petition of any party, upon the Commission's own motion, or upon the presiding officer's own motion -- waive one or more or all of the requirements in this subchapter. The petition shall clearly state the requirement sought to be waived and the reasons therefor.

52 Pa. Code § 57.72(e) (emphasis added). To the extent that waiver of any of the subparts of 52 Pa. Code § 57.72(d)(1) is necessary for PPL Electric to obtain the necessary siting and construction approvals for the Project via a Letter of Notification, PPL Electric has both requested a waiver of such regulations and has demonstrated that waiver is warranted.

Nevertheless, the Company is planning to submit a separate Petition for Waiver at the P-docket assigned to this matter, in order to satisfy Data Request A-1.

PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025

Q. A-2. Reference the Letter of Notification, page 2. Please provide a detailed explanation as to how each segment of the project would, on its own, meet the Commission's requirements for Letters of Notification. Additionally, please ensure that the explanation addresses work on the Sunbury – Susquehanna #1 230 kV line, Susquehanna – Transformer 21 230 kV line, and Susquehanna T10 – Transformer 10 Tap 230 kV line.

A. A-2. PPL Electric is filing the subject Letter of Notification under section (vi) of 52 Pa Code 57.72(d) for the SUSQ – SS01 230 kV Line as the length of this segment is less than 2 miles long.

PPL Electric is filing the subject Letter of Notification under section (vi) of 52 Pa Code 57.72(d) for the SUSQ – SS02 500 kV Line as the length of this segment is less than 2 miles long.

PPL Electric is filing the subject Letter of Notification under section (vi) of 52 Pa Code 57.72(d) for the SU10 – SS0X #1 & #2 230 kV Lines as the length of this segment is less than 2 miles long.

PPL Electric is filing the subject Letter of Notification for the SUNB – SUSQ 230 kV Line under section (i) of 52 Pa Code 57.72(d) as this work 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. Furthermore, as demonstrated in Attachment 2, Table 2-1, the number of structures located in the existing ROW will not change, and the height of the structures will not substantially change. The proposed monopole structures will also be constructed in generally the same location as the existing structures. In addition, the SUNB – SUSQ 230 kV Line meets the requirements of section (vi) of 52 Pa Code 57.72(d) as the length of this segment is less than 2 miles.

PPL Electric is filing the subject Letter of Notification for the SUSQ – T21 230 kV Line under section (i) of 52 Pa Code 57.72(d) as this work 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. Furthermore, as demonstrated in Attachment 2, Table 2-1, the number

WITNESS: Joseph Lookup

of structures located in the existing ROW will not change. The proposed monopole structures will also be constructed in generally the same location as the existing structures. In addition, the SUSQ – T21 230 kV Line meets the requirements of section (vi) of 52 Pa Code 57.72(d) as the length of this segment is less than 2 miles.

PPL Electric is filing the subject Letter of Notification for the SU10 – T10 230 kV Line under section (i) of 52 Pa Code 57.72(d) as this work 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. Furthermore, as demonstrated in Attachment 2, Table 2-1, the number of structures located in the existing ROW will not change. In addition, the SU10 – T10 230 kV Line meets the requirements of section (vi) of 52 Pa Code 57.72(d) as the length of this segment is less than 2 miles.

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025**

- Q. A-3. Reference the Letter of Notification, page 2. Please state the approximate length of transmission line to be re-worked or modified as part of the re-termination of the Sunbury – Susquehanna #1 230 kV Line.
- A. A-3. The length of transmission line to be worked on as part of the re-termination of the Sunbury – Susquehanna #1 230 kV Line is approximately 0.17 miles or 878 feet.

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025**

Q. A-4. Please state the approximate length of transmission line to be re-worked or modified as part of the re-termination of the Susquehanna T10 – Transformer 10 Tap 230 kV Line.

A. A-4. The length of transmission line to be worked on as part of the re-termination of the Susquehanna T10 – Transformer 10 Tap 230 kV Line is approximately 0.05 miles or 256 feet.

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025**

Q. A-5. Reference the Letter of Notification, Paragraph 17. Please explain how the subject project will address the issues related to the proceeding at FERC Docket No. ER24-2172.

A. A-5. As stated in the Letter of Notification, Paragraph 17, PJM submitted for filing in FERC Docket No. ER24-2172 an amended Interconnection Service Agreement (“ISA”) by and among PJM, SESS, and PPL Electric. The amended ISA at issue in that proceeding amended an existing ISA to increase from 300 MW to 480 MW the amount of co-located load provided for under the ISA, made revisions to the treatment of the co-located load, and made other changes to the ISA related to the behind-the-meter co-located load. Because the customer is moving from a behind-the-meter arrangement to a front-of-meter typical PPL Electric large load arrangement (see Letter of Notification, Paragraph 24), PPL Electric expects many, if not all, of the amendments to the ISA in Docket No. ER24-2172 to be rendered moot. The parties to that ISA may make further changes to accommodate the changes in load, however.

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025**

Q. A-6. Reference the Letter of Notification, Paragraph 24. Please provide a detailed explanation as to why the customer is requesting to change its service from behind the meter to become network load.

A. A-6. Although PPL Electric cannot testify as to the motivations of a third party in changing its service from behind-the-meter to front-of-meter network load, PPL Electric did raise concerns with the behind-the-meter setup prior to the amendments proposed in FERC Docket No. ER24-2172. See Attachment A-6. Particularly, PPL Electric stated that the setup raised serious reliability concerns on the transmission system. As the proposed amendments were rejected by FERC (subject to pending appeal), those reliability concerns remain. Moving to the front-of-meter setup facilitated by the transmission improvements at issue in the Letter of Notification is an alternative way of addressing those concerns.

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

PJM Interconnection, L.L.C.

Docket No. ER24-2172-000

**MOTION FOR LEAVE TO ANSWER PROTEST AND
ANSWER OF PPL ELECTRIC UTILITIES CORPORATION**

Pursuant to Rules 212 and 213 of the Rules and Regulations of the Federal Energy Regulatory Commission (“FERC” or “Commission”), 18 C.F.R. §§ 385.212, 213 (2023), PPL Electric Utilities Corporation (“PPL”) hereby files this Motion for Leave to Answer and Answer to the Protest of Exelon Corporation and American Electric Power Service Corporation¹ in the above-referenced docket. This Answer also addresses certain issues raised in responses to such protest.² Protesters and commenters argue to greatly expand the scope of this proceeding, but it should be resolved based only on the justness and reasonableness of the amended Interconnection Service Agreement by and among PJM, as Transmission Provider, Susquehanna as Interconnection Customer, and PPL, as Interconnected Transmission Owner, designated as Service Agreement No. 1442 (“Revised ISA”).³

¹ AEP and Exelon are referred to herein as the “Joint Protesters.”

² Motion for Leave to Answer and Answer of PJM Interconnection, L.L.C. (July 8, 2024) (“PJM Answer”); Motion for Leave and Answer of Susquehanna Nuclear, LLC (“Susquehanna”) (July 5, 2024) (“Susquehanna Answer”); Answer and Motion for Leave to Answer of the Independent Market Monitor for PJM (“IMM Answer”).

³ PPL also notes additional pleadings have been filed, including those by Constellation Energy Generation, Vistra, and Calpine. Many of these pleadings contain statements and policy arguments that PPL disagrees with, but generally support PPL’s view that this matter should be considered narrowly. PPL will not respond to these pleadings now because they are not relevant to the narrow issue in this proceeding, but reserves the right to respond to these arguments in the future.

I. INTRODUCTION

The Joint Protesters and the IMM raise important issues related to load located behind the meter of wholesale generators in PJM. However, these issues relate not to Susquehanna's obligations under the Revised ISA that are the relevant issues in this docket, but to general policy questions best addressed elsewhere. Importantly, Joint Protesters and the IMM supply no grounds to reject the Revised ISA, which greatly enhances the reliability of the PJM transmission system compared to the current version (Version 5.1.0) of the same ISA.⁴ Indeed, PPL's role in negotiating the Revised ISA was limited to better ensuring that the behind-the-meter load would be transparent to PJM and PPL, not suddenly appearing during a plant outage, and to ensuring additional protections necessary to keep the transmission system from being impacted by the behind-the-meter load.

The Revised ISA is not the first filing related to the behind-the-meter load at Susquehanna. The industry received public notice a year-and-a-half ago that Susquehanna's nuclear station ("Susquehanna Station") "was planning to connect [its] nuclear generating units ... to large data center loads."⁵ In February 2023, the ISA was first amended to address what is now referred to in the ISA as the "Co-Located Load."⁶ The Commission did not address generic issues related to service to behind-the-meter load in that docket and should not do so here. PPL fully recognizes that interest in various means of serving large behind-the-meter retail loads, including the legal, regulatory, and cost allocation issues associated with service to such loads, has increased within

⁴ See Susquehanna Answer at 4-7; PJM Answer at 3.

⁵ Transmittal Letter at 3, Docket No. ER23-1043 (Feb. 3, 2023).

⁶ PPL uses "behind-the-meter load" rather than "co-located load" here because the issues addressed in the Revised ISA arose due to the lack of direct connection with the local public utility, not the physical location of the load.

the electric industry and beyond.⁷ But, this proceeding is about the terms and conditions of a specific generation interconnection agreement of a generator that already sells energy to behind-the-meter load and has done so for more than a year. This is thus not the appropriate forum to address any issues outside the four corners of the Revised ISA.⁸ It is particularly not appropriate to address issues among PJM, PPL, and/or Susquehanna and non-parties to the Revised ISA, *i.e.*, Susquehanna’s wholesale customer and the retail behind-the-meter load.

PPL agrees that certain “legitimate (and complicated) questions”⁹ raised by Joint Protesters and the IMM in this docket should be considered by the Commission and the broader industry. For example, it is important to resolve the question of whether behind-the-meter loads “draw on the PJM transmission system every day for load following and ancillary services.”¹⁰ However, this and the other questions raised are beyond the scope of this proceeding, which is appropriately limited to determining whether the proposed revisions to the Revised ISA are just and reasonable.

PPL’s main goal in amending the ISA was to ensure the reliability of the PJM transmission system and to protect PPL’s customers. And the proposed revisions achieve that goal. The PJM transmission system will be more reliable as a result of the Revised ISA, which addressed many of PPL’s reliability concerns surrounding the behind-the-meter configuration as it previously existed at Susquehanna. Acceptance of the instant filing will lock in these reliability improvements

⁷ See generally, Jennifer Hiller and Sebastian Herrera, *Tech Industry Wants to Lock Up Nuclear Power for AI*, Wall Street Journal (July 1, 2024).

⁸ One issue inside the four corners of the document involves the treatment of Susquehanna Station as relates to its capacity obligations, in light of the behind-the-meter load. See Schedule F, Part C. PPL is not opining on this issue at this time, but reserves its right to do so in the future.

⁹ Exelon/AEP Protest at 4; see also IMM Answer at 1 (“issues raised by the proposed ISA are not narrow contractual issues limited to the proposed ISA”).

¹⁰ Exelon/AEP Protest at 9.

and necessary protections. The Revised ISA thus readily meets the legal standard for a non-conforming ISA.

II. ARGUMENT

A. The Revised ISA Provides Enhanced Grid Reliability and Should be Accepted.

Prior to Susquehanna's initial decision to sell power behind the meter, the unamended ISA provided PPL (and PJM) only limited protections should a generating unit trip offline or otherwise fail to supply the behind-the-meter load.¹¹ Any failure meant that a significant amount of behind-the-meter load, previously invisible to PPL and the PJM transmission system, would appear with no notice. Power could then flow from PPL's transmission facilities to the behind-the-meter load through the offline plant's facilities, putting reliability at risk.

PPL became concerned that the unamended ISA did not sufficiently address this risk or provide sufficient rights to PPL or PJM regarding the configuration. These reliability concerns—setting aside interesting, but distinct, policy issues raised by the Joint Protesters and the IMM—have now been addressed in the Revised ISA. For the benefit of PPL (and the broader PJM transmission system), the Revised ISA now:

- Requires real-time metering (MW & MVAR) and telemetry for the behind-the-meter load is also required, as well as adequate modeling of the load and breaker configuration in accordance with the PJM Manuals (Schedule C).
- Clarifies the Generation Capacity Resource may be subject to Capacity Resource Deficiency Charges and/or Non-Performance Charges based on its obligation (Schedule F, Part C.2).
- Requires Susquehanna under certain conditions to first obtain replacement capacity for an amount that is equal to or greater than the amount of power being transferred from the backup generating unit to the transmission facilities of the behind-the-meter load (*id.*).

¹¹ Service Agreement No. 1442, ISA, Schedule F (Version 4.0.0).

- Makes it impermissible for Susquehanna to install special protections systems or Remedial Action Schemes, relaying, automated systems or any other equipment that could activate upon the loss of a generating unit at Susquehanna so that another generating unit (“back-up generating unit”) at the Customer Facility could automatically begin to physically transfer power to the transmission facilities of the behind-the-meter load (Schedule F, Part D.1).
- Requires Susquehanna to receive advanced authorization from Transmission Provider, in order for a back-up generating unit at Susquehanna to physically transfer power to the transmission facilities of the behind-the-meter load (Schedule F, Part D.2).
- Requires Susquehanna to provide notification of a request to utilize back-up generating unit in a very specific manner (Schedule F, Part D.3).
- Toughens requirements surrounding the protection scheme that ensures that the behind-the-meter load separates in the event of loss of generation output from Susquehanna (Schedule F, Part E.1).
- Increases reporting, monitoring, relaying equipment and other requirements largely relating to reverse power flows or failures of the relevant operating procedures (Schedule F, Parts E.2-5).
- Allows PJM, in the event of a failure, and the unauthorized withdrawal of power, to assess the settlements, reliability, and compliance implications for such unexpected withdrawal from the Transmission System in coordination with PPL (Schedule F, Part F.4.a).
- Allows PPL in the event of a failure, and the unauthorized withdrawal of power, to declare an Emergency Condition and disconnect Susquehanna and only allow the behind-the-meter load to be reconnected with PPL and PJM’s approval (Schedule F, Part F.4.b).
- Provides PPL review rights to changes of the operating procedure of behind-the-meter load configurations (Schedule F, Parts F.5–7).
- Clarifies that the ISA does not waive PPL’s right to seek to impose charges on the behind-the-meter load (Schedule F, Parts F.5–9).

All of these provisions are necessary and reasonable to ensure an appropriate response if a nuclear unit at the station is offline and the behind-the-meter load continues to operate.

Absent the changes PPL sought and received in the Revised ISA, the reliability issues created by the behind-the-meter load at Susquehanna would remain. As a result, the currently

effective ISA has become unjust and reasonable in PPL’s view, and rejection of the Revised ISA would leave PPL and PJM in an untenable position. The legal standard for non-conforming provisions has been met because the revisions are both “consistent with or superior to” the *pro forma* ISA and “necessary” for reliability, coordination among the parties, and clarity among other reasons.¹²

B. The Policy Issues Raised by Protesters Are Not Appropriate in this Docket.

PPL agrees that there are wholesale policy issues that remain to be addressed regarding behind-the-meter load following the failure of PJM’s stakeholder process to propose any amendments to the PJM Tariff.¹³ But, the generic set of issues raised by Joint Protesters relate to all behind-the-meter load. These include the characteristics of that load, its impact and/or reliance on the transmission system, and issues related to cost allocation and billing. They exist in all behind-the-meter load arrangements, including at Susquehanna since it started selling wholesale power behind the meter. They are not driven by the instant Revised ISA. PPL has no objection to such issues being addressed in the proper forum.¹⁴ Indeed as a transmission owner with captive customers required to pay for transmission and ancillary services in PJM, PPL would actively participate in the policy discussion on many of them.¹⁵ But, the policy questions raised are not

¹² See Order No. 2003, Standardization of Generator Interconnection Agreements and Procedures, 104 FERC ¶ 61,103, Docket No. RM02-1-000 at P 26.

¹³ See Exelon/AEP Protest at 17–21 (describing stakeholder process); IMM Answer at 4 (same). The PJM stakeholder process’s repeated failures to address important issues is a common theme that is being addressed elsewhere. See *Duquesne Light Company*, ER24-2336, *et al.*

¹⁴ Answering such questions also may require reconsideration of certain aspects of PJM’s “Behind-the-Meter Generation” policy.

¹⁵ The Susquehanna Answer (at 7) suggest that PPL “does not share AEP/Exelon’s concerns.” Actually, PPL shares numerous policy concerns related to behind-the-meter load, but agrees with Susquehanna that they are more appropriately addressed elsewhere.

appropriate for this docket, which is limited to the justness and reasonableness of the Revised ISA.¹⁶

Similarly, the many retail policy questions raised by Joint Protesters and the IMM are also better addressed elsewhere. For instance, questions such as whether retail charges are applicable, or whether the relevant intermediary wholesale supplier can serve load in Pennsylvania at all, are best directed to the relevant regulatory authority, here the Pennsylvania Public Utilities Commission. PPL's agreement to the Revised ISA did not address retail sales to the behind-the-meter load.¹⁷ In fact, PPL insisted on reserving its rights related to retail questions (and all related policy questions) and language to that effect was included in the Revised ISA:

no Interconnection Party is waiving any legal or regulatory rights in any fora, including inter alia supporting or opposing any charges, rates, terms or conditions that could be imposed by the Federal Energy Regulatory Commission, Transmission Provider, or a Commonwealth of Pennsylvania regulatory authority, as well as the collection of such charges.¹⁸

In sum, although many questions related to behind-the-meter load generally remain to be answered, Docket No. ER24-2172 is not the appropriate forum to do so. Rejecting the Revised ISA would not result in any benefit because it would leave all of the relevant questions unanswered, but also deny the enhanced reliability protections PPL sought and obtained from

¹⁶ The Joint Protesters (at 11–12) also had questions about the transmission facilities that run from the Susquehanna Station to the behind-the-meter load, to the extent they are properly classified as transmission facilities. These questions are particularly not relevant to the Revised ISA, but address matters such as regulatory jurisdiction, if any, over the facilities.

¹⁷ Specifically, PPL did not agree that “Talen has the right to sell power directly to [the behind-the-meter customer]” as suggested in a recent press release. *Talen Statement on Exelon/AEP Objection to Susquehanna ISA*, (Jun. 27, 2024, 13:13 ET), <https://www.prnewswire.com/news-releases/talen-statement-on-exelonaep-objection-to-susquehanna-isa-302184866.html>.

¹⁸ Revised ISA, Schedule F, Part F.9.

Susquehanna in the Revised ISA. The Commission should accept the Revised ISA and clarify that it is not predetermining answers to any policy questions.

C. Joint Protesters Miscalculate the Effect on PPL Customers, Who Are Helped by the Revised ISA Compared to the Status Quo.

Joint Protesters attempt to convert the policy issue of whether the behind-the-meter load (or its wholesale supplier) should be paying PJM¹⁹ for various services into a factual issue by claiming that a cost shift of between \$58 million to \$140 million could occur. The entire calculation presented in Attachment 1 to the Declaration of John J. Reed and Danielle S. Powers appears to be based on PPL's retail rate schedules, as the declarants note at Paragraph 16. PPL disagrees with the accuracy of these calculations and with their fundamental assumption that behind-the-meter load would be subject to the retail rate schedule upon which those calculations are based. Further, the calculation significantly overstates the likely impact on customers of bringing the behind-the-meter load in front of the meter. Nevertheless, the issues of what and whether retail charges under retail tariffs should be assessed to the behind-the-meter load are outside the scope of this Revised ISA. This matter is limited to the effect of the Revised ISA itself, which significantly aids PPL's customers and the PJM transmission grid by strengthening the protections in the ISA.

III. MOTION FOR LEAVE TO ANSWER PROTEST

Although the Commission's Rules do not permit answers to protests as a matter of right, the Commission regularly accepts otherwise impermissible answers if such answers will assist the

¹⁹ Given the structure of the PJM Tariff, indirect power suppliers such as Susquehanna, would not typically be assessed any load-based charges. Typically, load-serving entities, who either are or are represented by a Market Participant, are assessed charges. If PJM is providing services are for the benefit of the behind-the-meter load, the Revised ISA should not impact who would pay for such service, particularly given Susquehanna is not selling power at retail.

Commission's understanding of the record and its decision-making.²⁰ To the extent necessary, PPL requests waiver of the prohibition of an answer in Rule 213(a)(2). The Commission should accept this Answer to clarify the record. Accepting this Answer will aid the Commission's decision-making process by responding to and correcting certain mischaracterizations as to the scope of this proceeding. Moreover, the Exelon/AEP Protest includes a motion to reject the Revised ISA, which PPL is entitled to respond to.

IV. CONCLUSION

Wherefore, for the reasons stated herein, PPL respectfully requests that the Commission accept the Revised ISA.

Respectfully submitted,

Steven M. Nadel

Steven M. Nadel
Senior Counsel
PPL Services Corp.
645 Hamilton Street, Suite 601
Allentown, PA 18101
Tel. 610.774.4775
SMNadel@pplweb.com

Counsel for PPL Electric Utilities Corp.

²⁰ See, e.g., *Calpine Corp. v. PJM Interconnection, L.L.C.*, 163 FERC ¶ 61,236 at P 31 (2018); *Sw. Power Pool, Inc.*, 154 FERC ¶ 61,279 at P 13 (2016); *Midcontinent Indep. Sys. Operator, Inc.*, 154 FERC ¶ 61,278 at P 6 (2016); *N.Y. Indep. Sys. Operator, Inc.*, 154 FERC ¶ 61,268 at P 17.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Allentown, PA this 12th day of July, 2024.

Steven M. Nadel

Steven M. Nadel

Senior Counsel

PPL Services Corp.

645 Hamilton Street, Suite 601

Allentown, PA 18101

Tel. 610.774.4775

SMNadel@pplweb.com

Counsel for PPL Electric Utilities Corp.

**PPL Electric Utilities Corporation
 Response to the Set I Data Requests of the
 Bureau of Technical Utility Services
 A-2025-3056806 and P-2025-3056867
Dated August 15, 2025**

Q. A-7. Reference the Letter of Notification, Paragraph 30. Please provide the estimated impact to the rates of PPL Electric’s other transmission level customers.

A. A-7. As stated in Attachment 1, page 1-2, PPL Electric estimates that the addition of 1 gigawatt of load has the potential to reduce other customers’ transmission charges by approximately 10%. For this specific project, assuming \$3.4M of costs in PPL Electric’s transmission rate base, a load increase of 1.414GW, the customer shops for their energy supply, and the project is in-service at full load today, the Company estimates the Transmission Service Charge (TSC) impacts below:

| | Current Rate As of June 12, 2025 | \$3.4M Capital Investment + 1.440 GW Increase | Difference |
|---|---|--|-------------------|
| Residential (\$/kWh) | \$ 0.03324 | \$ 0.02816 | \$ (0.00508) |
| Small Commercial & Industrial (SC&I) (\$/kWh) | \$ 0.03158 | \$ 0.02735 | \$ (0.00423) |
| Large Commercial & Industrial-Primary (LC&I-P) (\$/kW) | \$ 21.35000 | \$ 19.65600 | \$ (1.69400) |
| Large Commercial & Industrial-Transmission (LC&I-T) (\$/kW) | \$ 56.37800 | \$ 54.84500 | \$ (1.53300) |

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025**

Q. A-8. Reference the Letter of Notification, Paragraph 39. Please explain whether the increased capacity described is limited to increased available capacity upon project completion or whether it also includes any increase in current carrying capability regardless of available margin upon project completion.

A. A-8. The increased capacity referenced in Paragraph 39 refers to any increase in capacity above the current system. Increased capacity refers to upgrades that increase ratings on an existing line, new transmission lines, new substations, new transformers, or other projects increase load carrying or transfers on the system. The network upgrade adding capacity would be regardless of the available margin upon completion.

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025**

Q. A-9. Reference the Letter of Notification, Paragraph 39. Please explain whether the lower impedance described is limited to upgrades where the modifications result in lower line losses or whether it also includes upgrades where line losses increase due to the large load addition.

A. A-9. The lower impedance referenced in Paragraph 39 refers to any decrease in impedance from the current system regardless of the overall system loading or losses. Lowered impedance refers to upgrades that reduce the impedance of existing facilities through upgrades that increase wire size, install additional conductors, install additional circuits, or install additional transformation. The network upgrade reduces impedance where modifications result in lower line losses regardless of the overall system loading or losses.

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025**

Q. A-10. Reference the Letter of Notification, Paragraph 40. Please describe the upgrades which are included as part of the \$3.4 million.

A. A-10. The upgrades which are included as part of the \$3.4 million include substation equipment upgrades that increase ratings and provide asset health support in the Susquehanna 230 kV Switchyard, and fiber installation on the SUSQ – SS01 230 kV Line and remote terminals to support communication requirements. The fiber work reduces scope from an alternative solution that would have utilized a longer fiber route without the new line installation.

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025**

- Q. A-11. Reference the Letter of Notification, Paragraph 40. Please provide a detailed explanation as to how PPL Electric will recover its investment should the customer decide to cancel the subject project.
- A. A-11. PPL Electric and the Customer have entered into an Electric Service Agreement (ESA). As part of that ESA, PPL Electric has outlined the projected rate base expense scope. The Customer has provided a credit support to pay any amounts owed by Customer to PPL Electric under this agreement for the total rate base expense scope should the customer stop taking service prior to the Company receiving revenue equal to the rate based expense. During the term of the agreement, the Customer must satisfy the Electric Service Commitment. If the customer terminates the agreement, the customer is obligated to pay PPL Electric for any outstanding rate base expense obligations. PPL Electric will hold credit support until the Customer rate base expense obligation has been fully paid off. Any customer cost obligations will be paid before or near the time they are incurred limiting counterparty risk to PPL Electric.

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025**

Q. A-12. Reference the Letter of Notification, Paragraph 43. Please state that approximate size, in terms of acres, of any new easements to be obtained for the subject project.

A. A-12. PPL Electric will acquire approximately 6.30 acres of easement from the customer for the SU10 – SS0X #1 & #2 230 kV Lines. PPL Electric will also acquire approximately 10.31 acres of easement from the SSES comprised of approximately 5.44 acres for the SU10 – SS0X #1 & #2 230 kV Lines, approximately 0.95 acres for the SUSQ – SS02 500 kV Line, and approximately 3.92 acres for the SUSQ – SS01 230 kV Line. The cumulative total acreage of easement across the SSES and customer property is approximately 16.61 acres.

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025**

Q. A-13. Reference the Letter of Notification, Paragraph 53. Please state the approximate width of new and existing right-of-way for the proposed lines.

A. A-13. Please refer to Figure A-13-1, included here as Attachment A-13.

The SUSQ – SS01 230 kV Line will be within existing ROW (approximate width of at least 350 feet) and new ROW (approximately 150 feet wide) acquired via easement from the SSES.

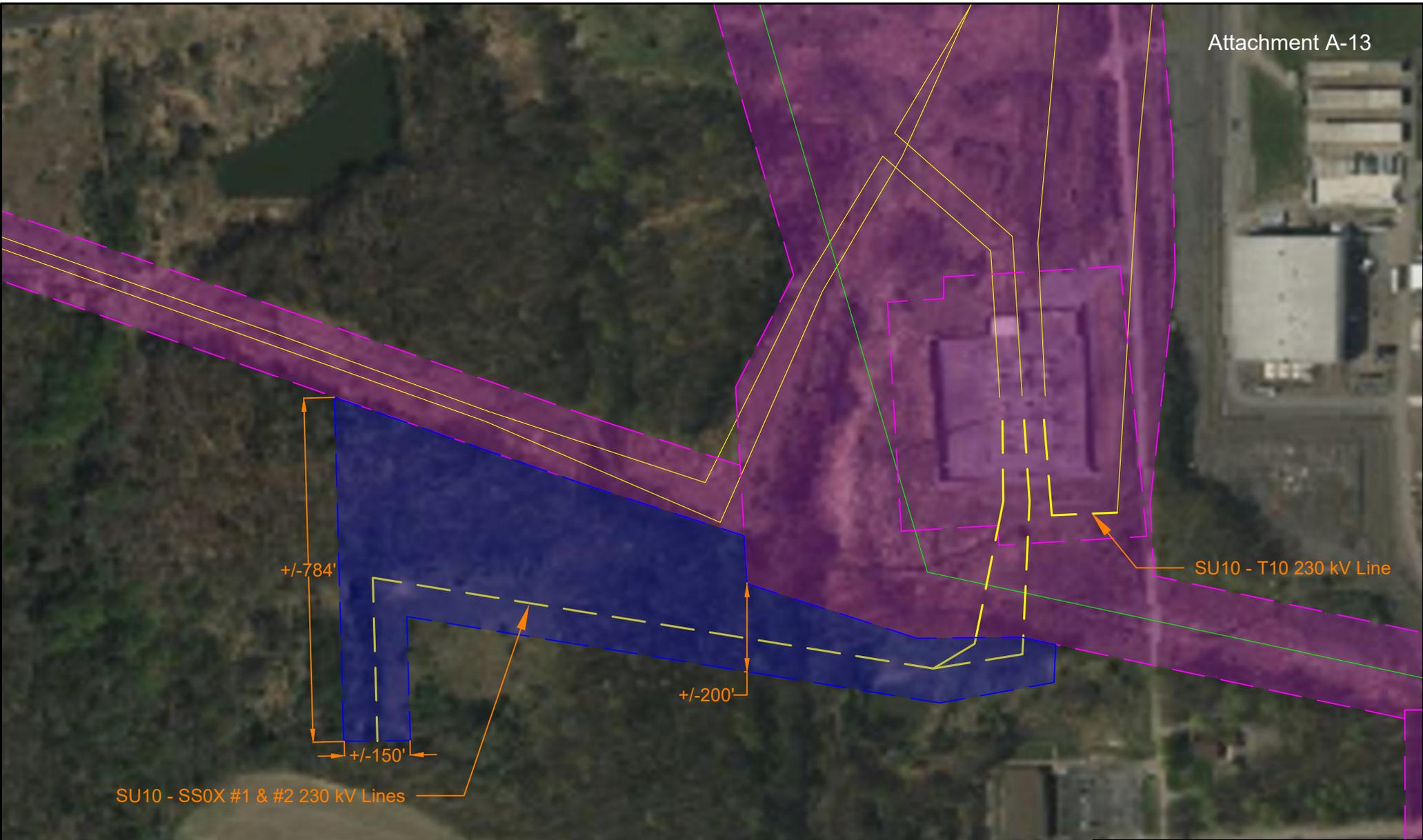
The SUSQ – SS02 500 kV Line will be within existing ROW and new ROW acquired via easement from the SSES. The new ROW acquisition area varies in width to extend the ROW boundary to at least 100 feet on the northern side of the 500 kV centerline.

The SU10 – SS0X #1 & #2 230 kV Lines will be within existing ROW and new ROW acquired via easement from the customer and the SSES. The new ROW is at least 75 feet in width on either side of the 230 kV line.

The SUNB – SUSQ 230 kV Line work will occur within existing ROW with varying widths up to approximately 485 feet near the Susquehanna 230 kV Switchyard.

The SUSQ – T21 230 kV Line work will occur within existing ROW approximately 350 feet wide.

The SU10 – T10 230 kV Line work will occur within existing ROW with varying widths up to approximately 950 feet around the Susquehanna T10 230 kV Switchyard



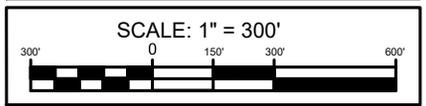
LEGEND

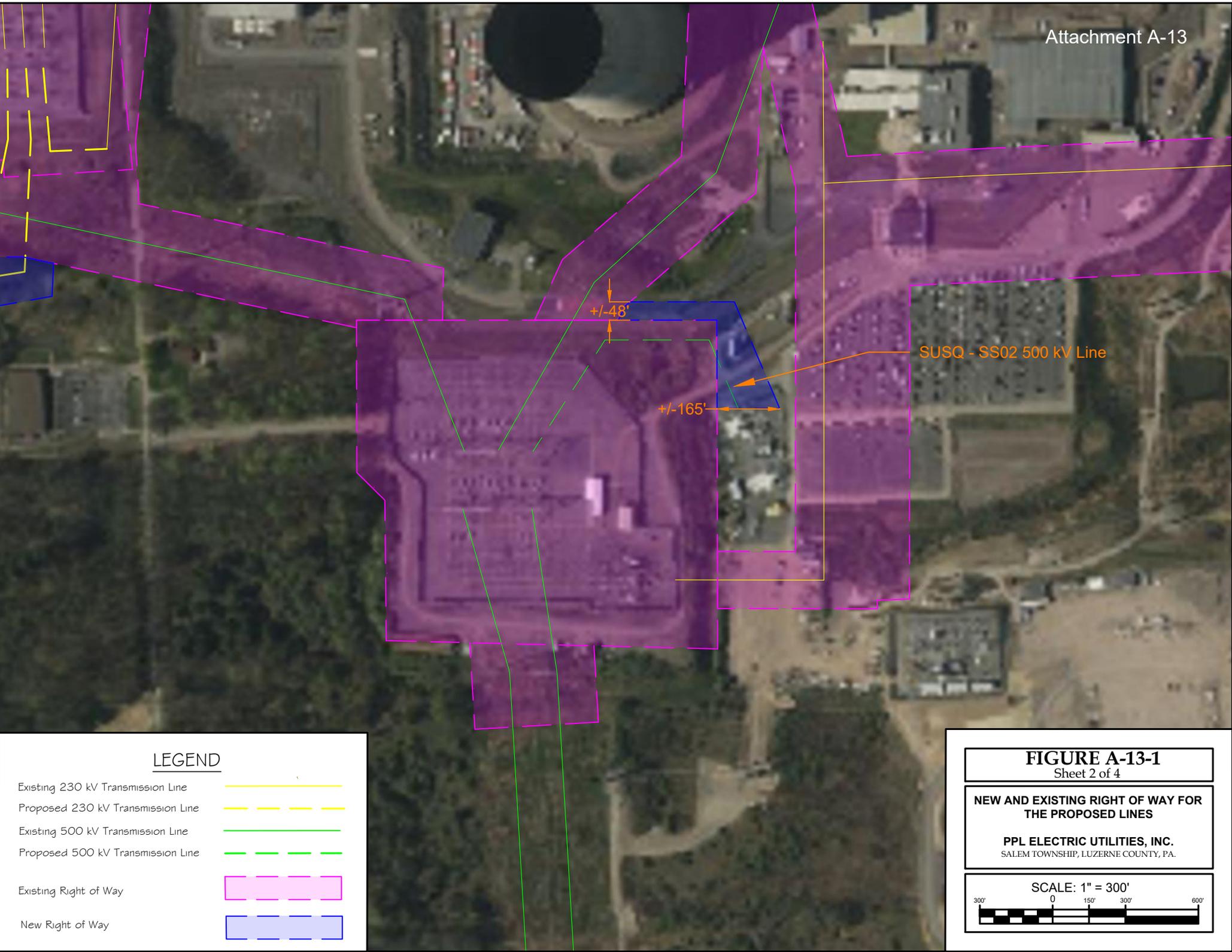
- Existing 230 kV Transmission Line 
- Proposed 230 kV Transmission Line 
- Existing 500 kV Transmission Line 
- Existing Right of Way 
- New Right of Way 

FIGURE A-13-1
Sheet 1 of 4

**NEW AND EXISTING RIGHT OF WAY FOR
THE PROPOSED LINES**

PPL ELECTRIC UTILITIES, INC.
SALEM TOWNSHIP, LUZERNE COUNTY, PA.





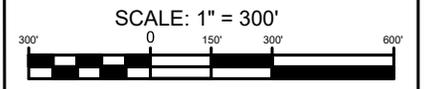
LEGEND

- Existing 230 kV Transmission Line
- Proposed 230 kV Transmission Line
- Existing 500 kV Transmission Line
- Proposed 500 kV Transmission Line
- Existing Right of Way
- New Right of Way

FIGURE A-13-1
Sheet 2 of 4

**NEW AND EXISTING RIGHT OF WAY FOR
THE PROPOSED LINES**

PPL ELECTRIC UTILITIES, INC.
SALEM TOWNSHIP, LUZERNE COUNTY, PA.



+/- 150'

SUSQ - SS01 230 kV Line

+/- 350'

SUSQ - T21 230 kV Line

LEGEND

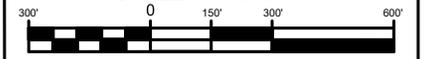
- Existing 230 kV Transmission Line 
- Proposed 230 kV Transmission Line 
- Existing Right of Way 
- New Right of Way 

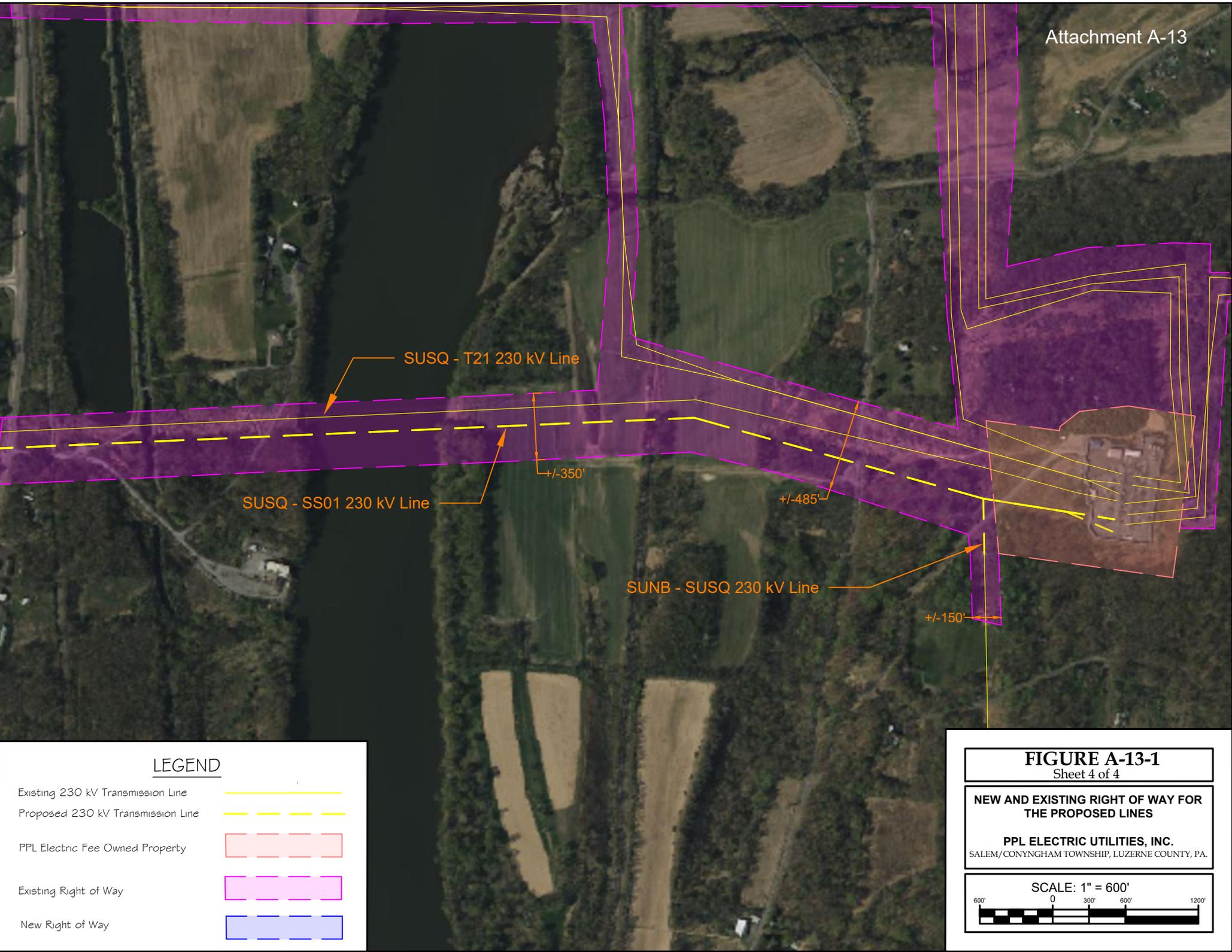
FIGURE A-13-1
Sheet 3 of 4

**NEW AND EXISTING RIGHT OF WAY FOR
THE PROPOSED LINES**

PPL ELECTRIC UTILITIES, INC.
SALEM TOWNSHIP, LUZERNE COUNTY, PA.

SCALE: 1" = 300'





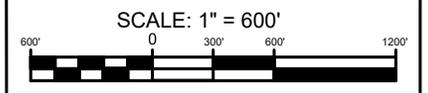
LEGEND

- Existing 230 kV Transmission Line
- Proposed 230 kV Transmission Line
- PPL Electric Fee Owned Property
- Existing Right of Way
- New Right of Way

FIGURE A-13-1
Sheet 4 of 4

**NEW AND EXISTING RIGHT OF WAY FOR
THE PROPOSED LINES**

PPL ELECTRIC UTILITIES, INC.
SALEM/CONYNGHAM TOWNSHIP, LUZERNE COUNTY, PA.



**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025**

Q. A-14. Reference the Letter of Notification, Paragraph 73. Please describe the measures PPL Electric will take to avoid impacts to the wetland.

A. A-14. As discussed in Attachment 3, PPL Electric has conducted wetland delineations and will adhere to any permits acquired for project construction in accordance with state and federal permitting requirements. In addition, PPL Electric minimized impacts to wetlands by placing new structures outside of wetlands wherever possible. For the one structure proposed within a wetland, PPL Electric has included this information in the National Pollutant Discharge Elimination System (NPDES) Permit being acquired through the Pennsylvania Department of Environmental Protection and will implement the following mitigation methods during construction: installation of wetland timber matting, hand cutting trees, hand carrying pulling ropes through the wetland, and orange construction fence installation to minimize impact.

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025**

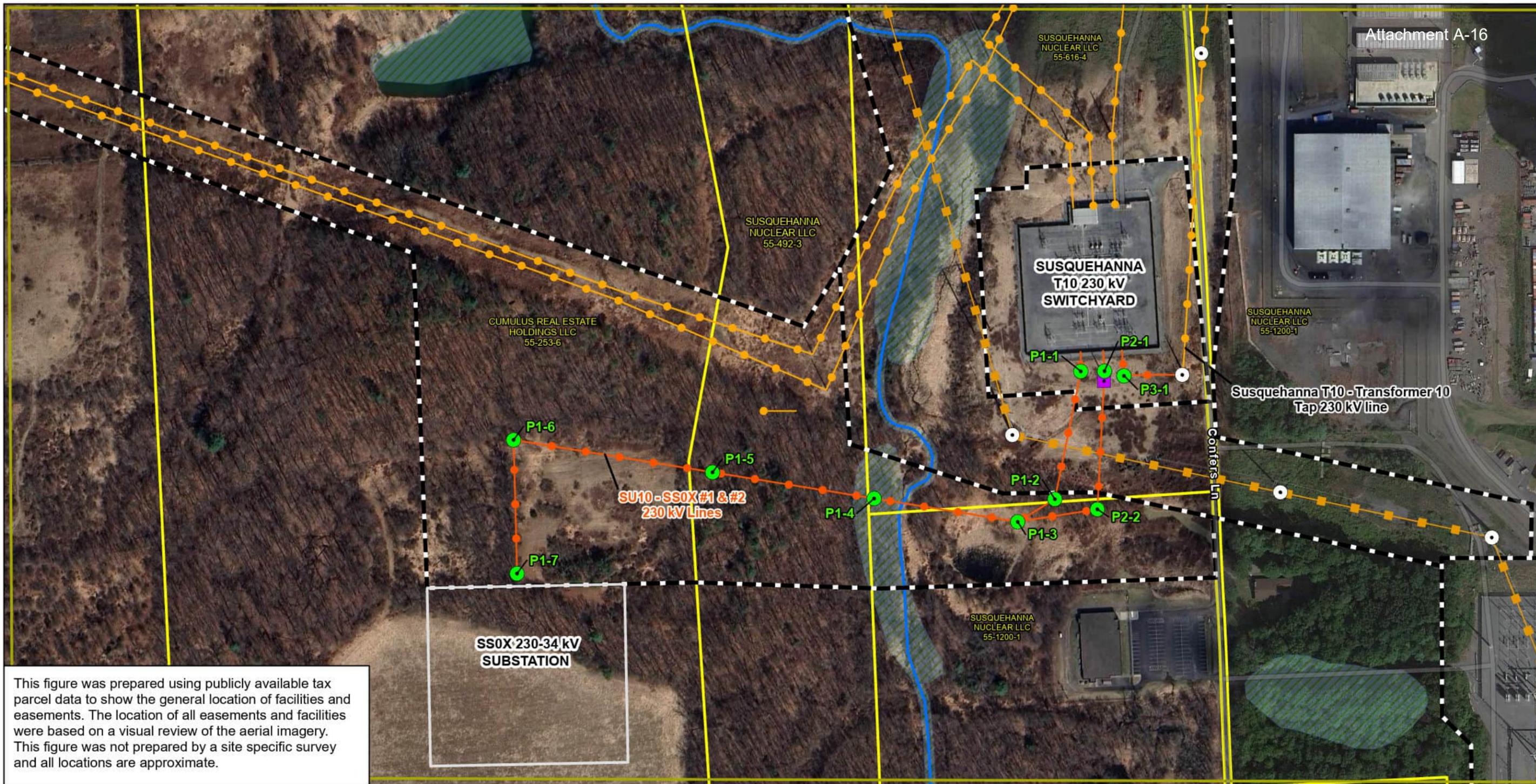
Q. A-15. Reference the Letter of Notification, Attachment 1, page 9. Please explain when PPL Electric anticipates completion PJM's do no harm analysis.

A. A-15. PJM is in the process of conducting the do no harm analysis and is expected to be completed at the end of September 2025.

WITNESS: Joseph Lookup

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services
A-2025-3056806 and P-2025-3056867
Dated August 15, 2025**

- Q. A-16. Reference the Letter of Notification, Attachment 3, Sheet 1 & Sheet 3. Please provide a copy of the drawings which clearly label the existing transmission lines to be modified as part of the subject project.
- A. A-16. Please refer to the updated Figure 3-1, included here as Attachment A-16.



This figure was prepared using publicly available tax parcel data to show the general location of facilities and easements. The location of all easements and facilities were based on a visual review of the aerial imagery. This figure was not prepared by a site specific survey and all locations are approximate.

Legend

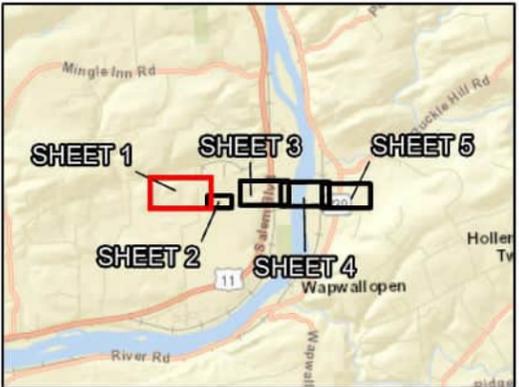
| | |
|-------------------------------------|-------------------|
| Existing Structure (To Remain) | PPL EU 230kV ROW |
| Proposed Structure | Parcels Boundary |
| Existing Structure (To Be Replaced) | USGS Streams |
| Proposed Substation Site | NWI Wetlands |
| New 230kV Transmission Line | PA Municipalities |
| Existing 230kV Transmission Line | |
| Existing 500kV Transmission Line | |

Notes:

- Existing and Proposed Structures provided by PPL Electric Utilities (PPL EU) in March and April 2025.
- Existing ROW and proposed substation location provided by PPL EU in June 2025.

NAD 1983 StatePlane_Pennsylvania
 South FIPS 3702 Feet
 Projection: Lambert Conformal Conic
 Linear Unit: US Foot

References:
 NWI Wetlands (2025)
 National Flood Hazard Layer (NFHL) (FEMA 2024)
 Natural Heritage Areas (NHA) (PNHP 2020)
 NHD Flowline (USGS 2025)
 0.5 foot Orthoimagery (PEMA 2021)

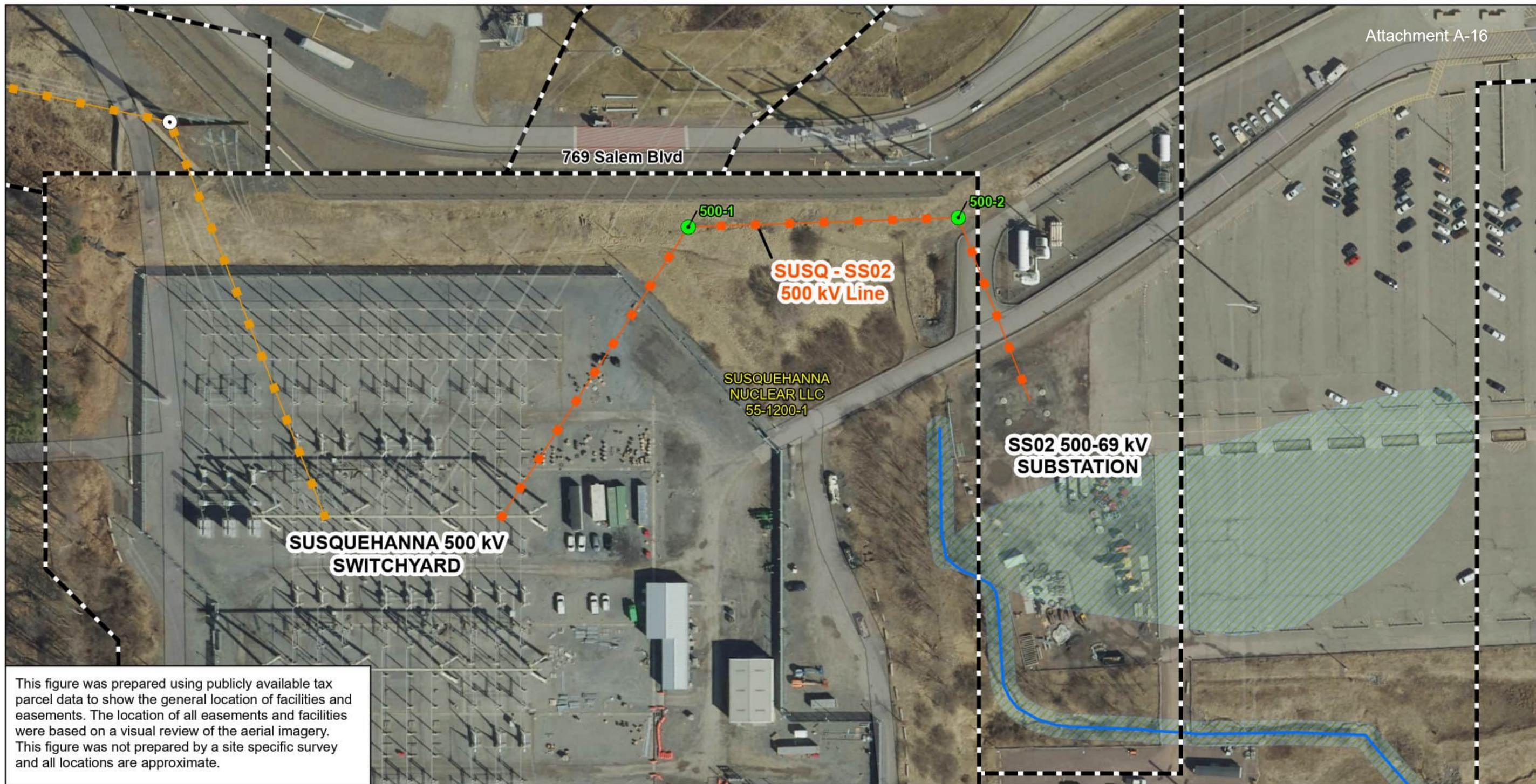


AECOM

FIGURE 3-1
PPL Susquehanna
230kV and 500kV
Transmission Line Project
Sheet 1 of 5

Luzerne County, Pennsylvania

| | |
|------------------|-----------------|
| Prepared By: GIB | Checked By: RB |
| Job: 60750277 | Date: 8/19/2025 |



This figure was prepared using publicly available tax parcel data to show the general location of facilities and easements. The location of all easements and facilities were based on a visual review of the aerial imagery. This figure was not prepared by a site specific survey and all locations are approximate.

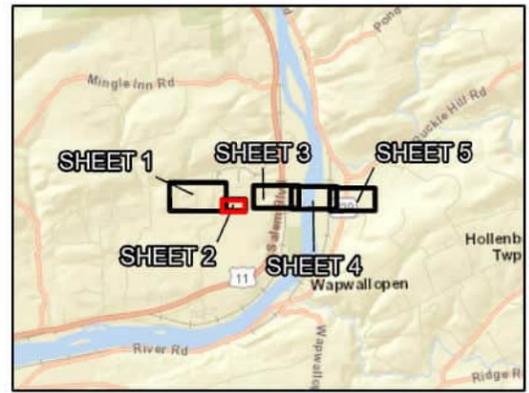
Legend

- Existing Structure (To Remain)
- Proposed Structure
- Existing Structure (To Be Replaced)
- New 500kV Transmission Line
- Existing 500kV Transmission Line
- PPL EU 230kV ROW
- Parcel Boundary
- USGS Streams
- NWI Wetlands
- PA Municipalities

Notes:
 1. Existing and Proposed Structures provided by PPL Electric Utilities (PPL EU) in March and April 2025.

NAD 1983 StatePlane_Pennsylvania
 South FIPS 3702 Feet
 Projection: Lambert Conformal Conic
 Linear Unit: US Foot

References:
 NWI Wetlands (2025)
 National Flood Hazard Layer (NFHL) (FEMA 2024)
 Natural Heritage Areas (NHA) (PNHP 2020)
 NHD Flowline (USGS 2025)
 0.5 foot Orthoimagery (PEMA 2021)

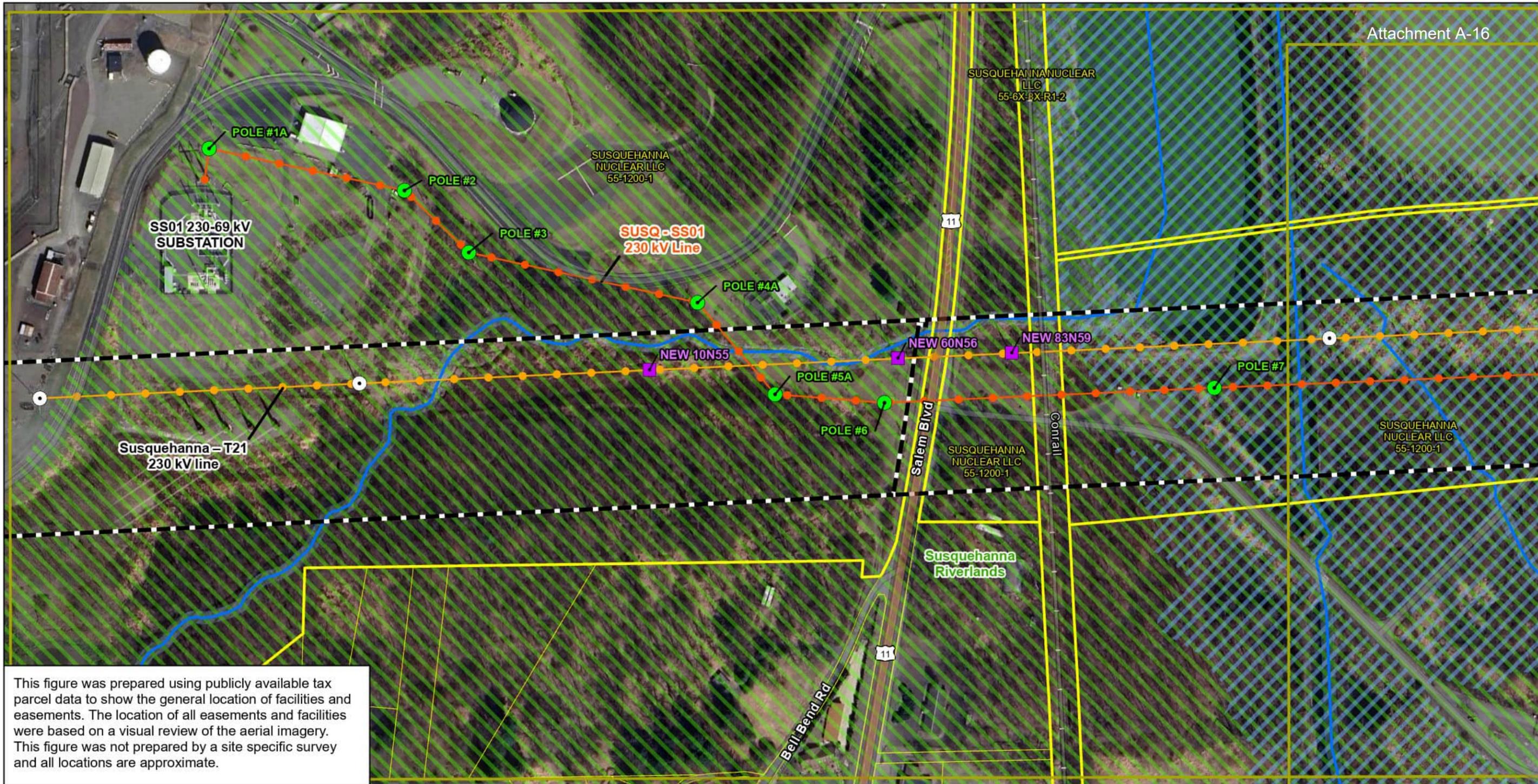


AECOM

FIGURE 3-1
PPL Susquehanna
230kV And 500kV
Transmission Line Project
Sheet 2 of 5

Luzerne County, Pennsylvania

| | |
|------------------|-----------------|
| Prepared By: GIB | Checked By: RB |
| Job: 60750277 | Date: 8/19/2025 |



This figure was prepared using publicly available tax parcel data to show the general location of facilities and easements. The location of all easements and facilities were based on a visual review of the aerial imagery. This figure was not prepared by a site specific survey and all locations are approximate.

Legend

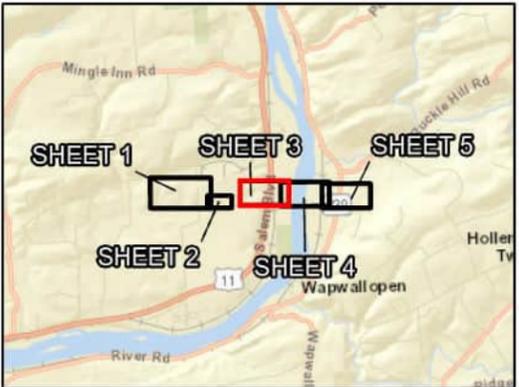
| | |
|---------------------------------------|-----------------------|
| ● Existing Structure (To Remain) | ▬ PPL EU 230kV ROW |
| ● Proposed Structure | ▬ Parcels Boundary |
| ■ Existing Structure (To Be Replaced) | ▬ State Roads |
| — New 230kV Transmission Line | — USGS Streams |
| — Existing 230kV Transmission Line | — 100-Year Floodplain |
| | — Natural Area |
| | — NWI Wetlands |
| | ▭ PA Municipalities |

Notes:

- Existing and Proposed Structures provided by PPL Electric Utilities (PPL EU) in March and April 2025.
- Existing ROW and proposed substation location provided by PPL EU in June 2025.

NAD 1983 StatePlane_Pennsylvania
 South FIPS 3702 Feet
 Projection: Lambert Conformal Conic
 Linear Unit: US Foot

References:
 NWI Wetlands (2025)
 National Flood Hazard Layer (NFHL) (FEMA 2024)
 Natural Heritage Areas (NHA) (PNHP 2020)
 NHD Flowline (USGS 2025)
 0.5 foot Orthoimagery (PEMA 2021)

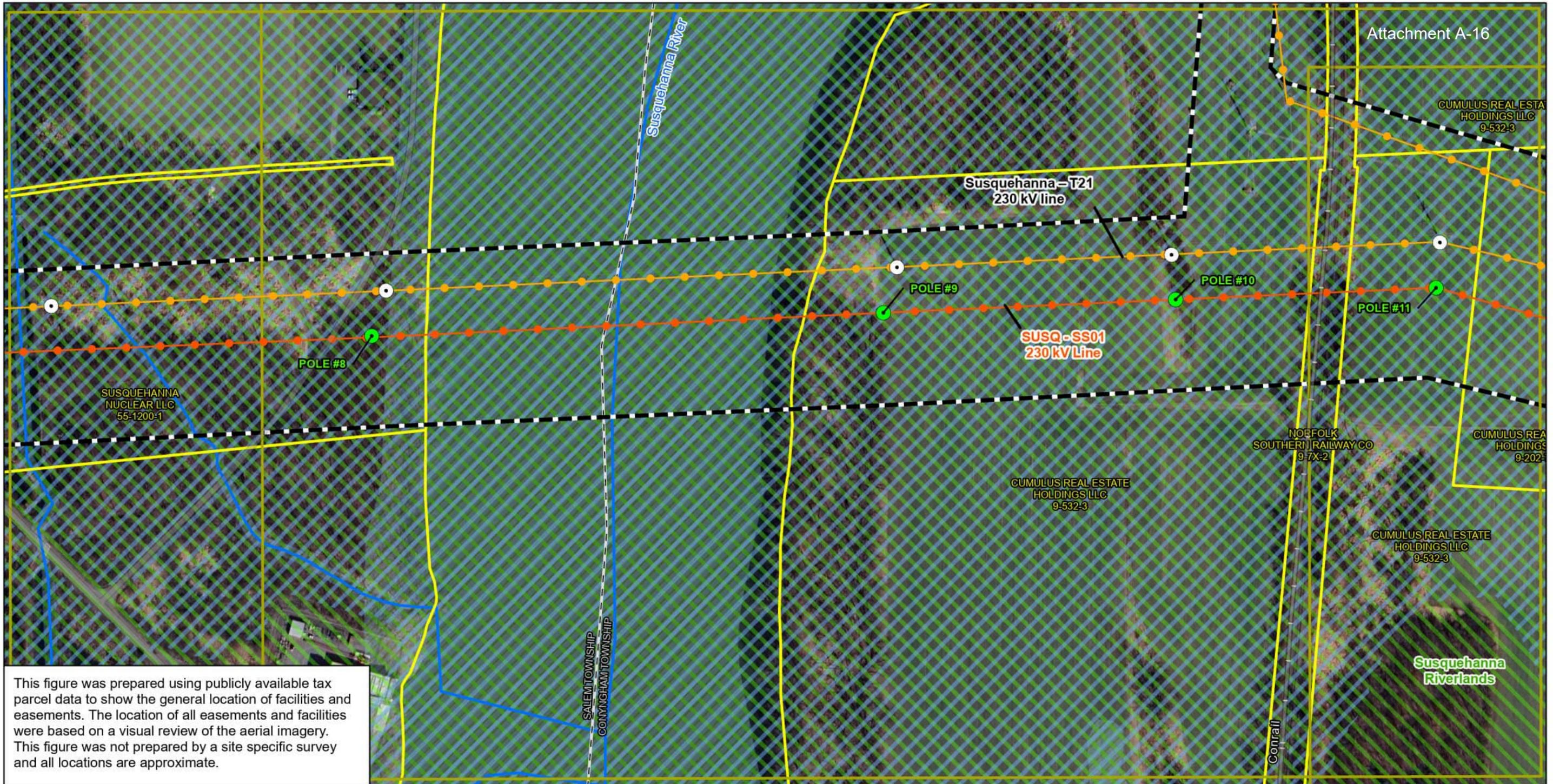


ppl AECOM
 PPL Electric Utilities

FIGURE 3-1
PPL Susquehanna
230kV and 500kV
Transmission Line Project
Sheet 3 of 5

Luzerne County, Pennsylvania

| | |
|------------------|-----------------|
| Prepared By: GIB | Checked By: RB |
| Job: 60750277 | Date: 8/19/2025 |



This figure was prepared using publicly available tax parcel data to show the general location of facilities and easements. The location of all easements and facilities were based on a visual review of the aerial imagery. This figure was not prepared by a site specific survey and all locations are approximate.

Legend

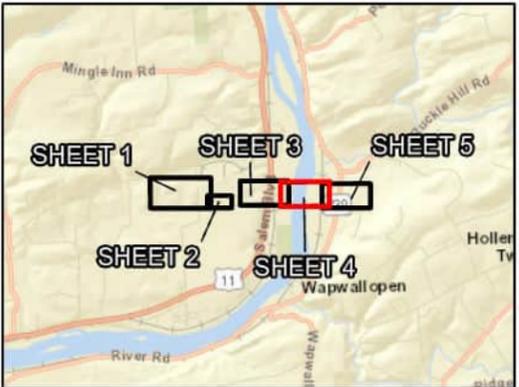
| | |
|----------------------------------|---------------------|
| Existing Structure (To Remain) | PPL EU 230kV ROW |
| Proposed Structure | Parcels Boundary |
| New 230kV Transmission Line | USGS Streams |
| Existing 230kV Transmission Line | 100-Year Floodplain |
| | Natural Area |
| | NWI Wetlands |
| | PA Municipalities |

Notes:

- Existing and Proposed Structures provided by PPL Electric Utilities (PPL EU) in March and April 2025.
- Existing ROW and proposed substation location provided by PPL EU in June 2025.

NAD 1983 StatePlane_Pennsylvania
 South FIPS 3702 Feet
 Projection: Lambert Conformal Conic
 Linear Unit: US Foot

References:
 NWI Wetlands (2025)
 National Flood Hazard Layer (NFHL) (FEMA 2024)
 Natural Heritage Areas (NHA) (PNHP 2020)
 NHD Flowline (USGS 2025)
 0.5 foot Orthoimagery (PEMA 2021)

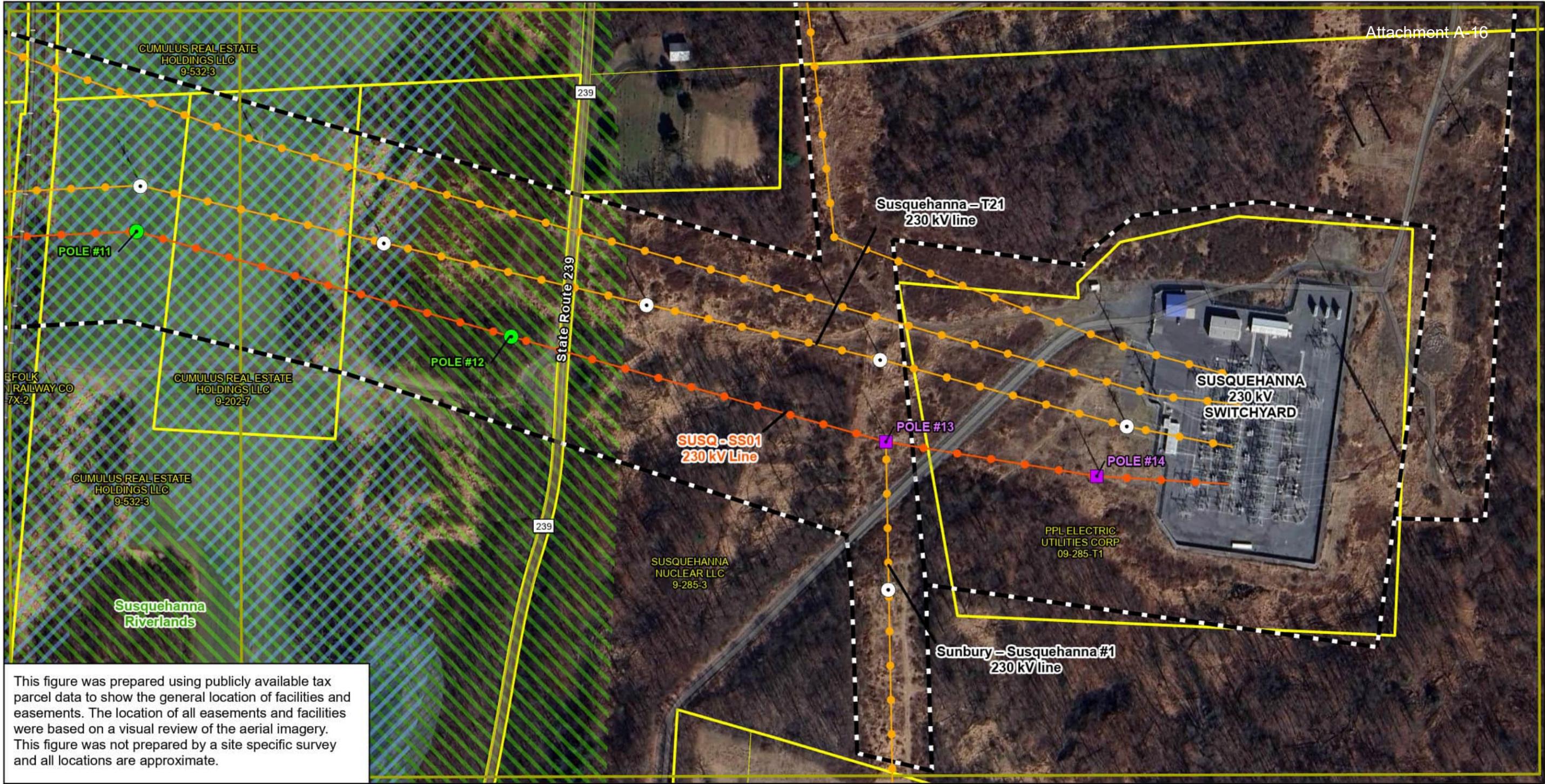


AECOM

FIGURE 3-1
PPL Susquehanna
230kV and 500kV
Transmission Line Project
Sheet 4 of 5

Luzerne County, Pennsylvania

| | |
|------------------|-----------------|
| Prepared By: GIB | Checked By: RB |
| Job: 60750277 | Date: 8/19/2025 |



This figure was prepared using publicly available tax parcel data to show the general location of facilities and easements. The location of all easements and facilities were based on a visual review of the aerial imagery. This figure was not prepared by a site specific survey and all locations are approximate.

Legend

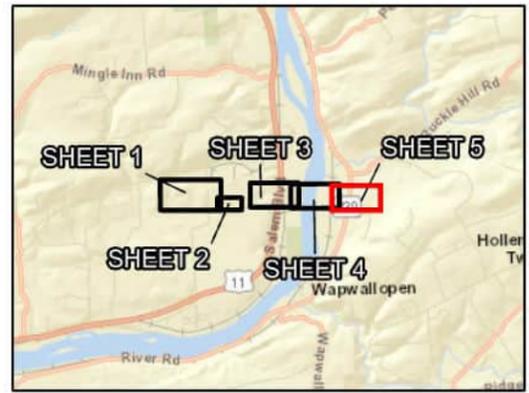
| | |
|---------------------------------------|-----------------------|
| ● Existing Structure (To Remain) | ▬ PPL EU 230kV ROW |
| ● Proposed Structure | ▬ Parcels Boundary |
| ■ Existing Structure (To Be Replaced) | ▬ State Roads |
| — New 230kV Transmission Line | ▬ 100-Year Floodplain |
| — Existing 230kV Transmission Line | ▬ Natural Area |
| | ▬ NWI Wetlands |
| | ▬ PA Municipalities |

Notes:

- Existing and Proposed Structures provided by PPL Electric Utilities (PPL EU) in March and April 2025.
- Existing ROW and proposed substation location provided by PPL EU in June 2025.

NAD 1983 StatePlane_Pennsylvania
 South FIPS 3702 Feet
 Projection: Lambert Conformal Conic
 Linear Unit: US Foot

References:
 NWI Wetlands (2025)
 National Flood Hazard Layer (NFHL) (FEMA 2024)
 Natural Heritage Areas (NHA) (PNHP 2020)
 NHD Flowline (USGS 2025)
 0.5 foot Orthoimagery (PEMA 2021)



ppl AECOM
 PPL Electric Utilities

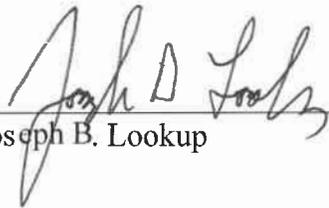
FIGURE 3-1
PPL Susquehanna
230kV and 500kV
Transmission Line Project
Sheet 5 of 5
Luzerne County, Pennsylvania

| | |
|------------------|-----------------|
| Prepared By: GIB | Checked By: RB |
| Job: 60750277 | Date: 8/19/2025 |

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: August 25, 2025



Joseph B. Lookup