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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 for filing is the Petition for Waiver on behalf of PPL Electric Utilities Corporation (“PPL Electric”), for the above-captioned proceedings. The above-referenced Letter of Notification was filed on August 11, 2025. On August 15, 2025, the Commission’s Bureau of Technical Utility Services (“TUS”) served its first set of data requests in the above-captioned proceeding, which directed PPL Electric to file a petition for waiver of the Commission’s regulations at 52 Pa. Code § 57.72(d)(1)(vi). In response to the applicable Data Request, PPL Electric explained that the above-captioned Letter of Notification requested a limited waiver of the Commission’s regulations at 57.72(d)(1), to the extent such waiver was necessary. Nevertheless, and pursuant to the directive

Matthew Homsher, Secretary
August 25, 2025
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of TUS, PPL Electric hereby files this Petition for Waiver.

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

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

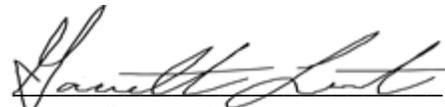
Cumulus Real Estate Holdings LLC
Marc A Jackson Real Estate & Property
Management
600 Hamilton St
Allentown, Pa
18101-2130

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

PETITION FOR WAIVER

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric”) hereby files this Petition for Waiver, pursuant to 52 Pa Code §§ 5.43 and 57.72(e), seeking a waiver of certain of the Pennsylvania Public Utility Commission’s (“Commission”) regulations governing the review and approval of the siting and construction of high voltage electric transmission lines set forth at 52 Pa. Code §§ 57.71 et seq. On August 15, 2025, the Commission’s Bureau of Technical Utility Services (“TUS”) served its first set of data requests in the above-captioned proceeding, which directed PPL

Electric to file a petition for waiver of the Commission's regulations at 52 Pa. Code § 57.72(d)(1)(vi). In response to the applicable Data Request, PPL Electric explained that the above-captioned Letter of Notification requested a limited waiver of the Commission's regulations at 57.72(d)(1), to the extent such waiver was necessary. Nevertheless, and pursuant to the directive of TUS, PPL Electric hereby files this Petition for Waiver.

By way of background, on August 11, 2025, PPL Electric filed the above-captioned Letter of Notification seeking Commission approval to: (1) build approximately 1.5 miles of new single circuit 230 kV transmission line that is needed to connect the existing Susquehanna 230 kV Switchyard to the existing customer owned "SS01" 230-69 kV substation; (2) build a new single circuit 0.2-mile-long 500 kV transmission line from the Susquehanna 500 kV Switchyard to the existing customer owned "SS02" 500-69 kV substation; and (3) 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 "SS0X" 230-34 kV substation. In addition to these new overhead high-voltage ("HV") transmission lines, PPL Electric also plans to: (1) re-terminate the existing Sunbury – Susquehanna #1 230 kV line at the Susquehanna 230 kV Switchyard; (2) raise three spans of the existing Susquehanna – Transformer 21 230 kV line; and (3) re-terminate the existing Susquehanna T10 – Transformer 10 Tap 230 kV line at the Susquehanna T10 230 kV Switchyard. The modifications to these three existing lines are necessary to accommodate the proposed HV lines and will take place entirely upon existing PPL Electric right-of-way or customer and Susquehanna Steam Electric Station ("SSES") property where easements are being finalized.

Collectively, the siting and construction of the three new HV transmission lines, as well as the associated re-termination of existing transmission lines at the Susquehanna 230 kV Switchyard and raising of existing transmission lines, will be known as the "Susquehanna 230 kV and 500 kV

Transmission Line Project” or “Project.” This Project is needed to meet the electrical needs and demands of a new customer requesting transmission level service in Salem Township, Luzerne County, Pennsylvania.

As explained herein, waiver of certain of the Commission’s regulations governing review and approval of the siting and construction of high voltage electric transmission lines is appropriate in this case 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 the Letter of Notification.

I. INTRODUCTION

1. This Petition for Waiver is filed by PPL Electric, a public utility that provides electric distribution, transmission, and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission.

2. PPL Electric’s address is as follows:

PPL Electric Utilities Corporation
827 Hausman Road
Allentown, Pennsylvania 18104

3. PPL Electric's attorneys are:

Michael J. Shafer (I.D. # 205681)
PPL Services Corporation
645 Hamilton Street, Suite 700
Allentown, PA 18101
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Fax: 610-774-4102
E-mail: mjshafer@pplweb.com

David B. MacGregor (I.D. # 28804)
Garrett P. Lent (I.D. #321566)
Megan E. Rulli (I.D. # 331981)
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17 North Second Street
12th Floor
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Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
glent@postschell.com
mrulli@postschell.com

PPL Electric's attorneys are authorized to receive all notices and communications regarding this Petition for Waiver.

4. PPL Electric furnishes electric service to approximately 1.5 million customers throughout its certificated service territory, which includes all or portions of 29 counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania. PPL Electric is a "public utility" and an "electric distribution company" as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 102, 2803.

5. PPL Electric owns approximately 5,000 miles of transmission lines operating at 69 kV or higher, approximately 375 substations with a capacity of 10 MVA (megavolt amperes) or more, and approximately 43,000 miles of distribution lines operating at less than 69 kV.

6. This Petition for Waiver contains all the information required by 52 Pa Code §§ 5.43 and 57.72(e). In addition, PPL Electric incorporates the above-captioned Letter of Notification, with accompanying Attachments, herein by reference.

II. PETITION FOR WAIVER

A. LEGAL STANDARD FOR WAIVER

7. Section 5.43 of the Commission's regulations allows a party to petition for waiver of the Commission's regulations. 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).

8. The Commission has approved similar requests granting waivers of certain regulations regarding Commission Review of Siting and Construction of Electric Transmission Lines at 52 Pa Code § 57.71 *et seq.* See, e.g., *Letter of Notification of West Penn Power Company filed pursuant to 52 Pa. Code Chapter 57 with respect to reconstruction and relocation of the Allegheny Ludlum No. 2 138 kV Transmission Line in the City of Lower Burrell, Westmoreland County, Pennsylvania*, Docket No. A-2012-2281399 (March 1, 2012) (approving the construction of a 2.7 mile transmission line project under 52 Pa. Code § 57.72(d)(1)(v) and (vi) because a portion of the line transmission line is to be reconducted or reconstructed and a separate portion being relocated is less than two miles in length); *Petition for Waiver of Certain Provisions of the Pennsylvania Public Utility Commission's Regulations for Commission Review of Siting and Construction of Electric Transmission Lines set forth at 52 Pa. Code § 57.71 et seq.*, Docket No. P-2008-2037618 (June 27, 2008) (approving a for a waiver from Section 57.72(d) for the construction of a 3.9 mile 115 kV transmission line to connect a new ethanol plant to the grid); *Letter of Notification of Pennsylvania Electric Company pursuant to 52 Pa. Code § 57.72(d) to*

install the East-Towanda Mansfield 115 kV Transmission Line Tap to the Tennessee Gas Pipeline Substation located in Troy Township, Bradford County, Pennsylvania (Penelec/Tennessee Gas), Docket No. A-110400F0045 (February 6, 2006) (approving a request for waiver of certain provisions of 52 Pa. Code § 57.72(d)(1) for a 2.6 miles long transmission line project located along the rights-of-way of an existing line and across the property of the sole customer to be served by the line).

B. WAIVER IS APPROPRIATE IN THIS CASE

9. The purpose of this Petition for Waiver is to obtain from the Commission such waivers as are necessary or appropriate to permit PPL Electric to proceed by means of a single Letter of Notification for the siting and construction of three new HV transmission lines, as well as the associated re-termination of existing transmission lines at the Susquehanna 230 kV Switchyard and raising of existing transmission lines.

10. Given that the purpose of the Project is to accommodate the interconnection needs of a new customer, that each of the component HV lines have a proposed route of two miles or less, and that the total line length of each of the component HV lines together is only 2.1 miles, the use of a single Letter of Notification will provide all the information necessary for the Commission and interested parties to fully review and determine whether the Project should be approved. In addition, the Project will be constructed entirely within existing PPL Electric ROW or within property owned in fee by SSES or the customer.

11. Further, the use of a Letter of Notification will permit PPL Electric to complete the filings required for approval in a much shorter period of time than would be required to prepare a complete siting application for the Project. Importantly, construction of the Project is anticipated to commence in October 2025 to support an in-service date of April 2028. Regulatory review in a shorter period of time will enable PPL Electric to complete construction of the Project and

maintain the construction and in-service dates without jeopardizing or otherwise delaying the construction schedule required for the customer.

12. As explained more fully in the Letter of Notification, the Project requires building approximately 2.1 miles of new transmission lines. The Project could be separated into three distinct components.

13. The first component of the Project requires building approximately 1.5 miles of new single circuit 230 kV transmission line that is needed to connect the existing Susquehanna 230 kV Switchyard to the existing customer owned “SS01” 230-69 kV substation

14. The second component of the Project requires a new single circuit 0.2-mile-long 500 kV transmission line from the Susquehanna 500 kV Switchyard to the existing customer owned “SS02” 500-69 kV substation.

15. The third component of the Project requires building a new double circuit 0.4-mile-long 230 kV transmission line from the Susquehanna T10 230 kV Switchyard to a new customer owned “SS0X” 230-34 kV substation.

16. In addition to these new overhead HV transmission lines, PPL Electric also plans to modify three existing transmission lines. These modifications are necessary to accommodate the proposed HV lines and will take place entirely upon existing PPL Electric right-of-way or customer and SSES property where easements are being finalized.¹ Specifically, PPL Electric plans to: (1) re-terminate the existing Sunbury – Susquehanna #1 230 kV line at the Susquehanna 230 kV Switchyard; (2) raise three spans of the existing Susquehanna – Transformer 21 230 kV line; and (3) re-terminate the existing Susquehanna T10 – Transformer 10 Tap 230 kV line at the Susquehanna T10 230 kV Switchyard.

¹ Although SESS is not PPL Electric’s customer, PPL Electric notes that they are a third-party related to the customer that is specifically requesting PPL Electric to undertake the Project.

17. Because the total line length of each of the component HV lines together is only 2.1 miles, PPL Electric submits that the most practical and efficient method to obtain Commission review and approval for the siting of the Project is a single Letter of Notification under 52 Pa. Code Pa. Code § 57.72(d) rather than multiple Letters of Notification addressing the same Project and need. The use of a single Letter of Notification will provide all the information necessary for the Commission and interested parties to fully review and determine whether the Project should be approved.

18. The Commission's regulation at 52 Pa. Code § 57.72(d) sets forth the circumstances under which an electric public utility may seek Commission approval for the siting and construction of a proposed high voltage transmission line by means of a Letter of Notification instead of a full Application as follows:

(d) Letter of notification in lieu of Application:

(1) A Letter of Notification may be filed with the commission in lieu of the Application process set forth in §§ 57.71 – 57.76 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 the 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 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 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 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).

19. As proposed, the Project does not meet the strict definition of any one of the circumstances in which a Letter of Notification may be used, as set forth above. The Project, however, nearly fits within the requirements of Section 57.72(d)(1)(vi), because each of the component HV lines have a proposed route of two miles or less and the total line length of each of the component HV lines together is only 2.1 miles.

20. PPL Electric respectfully requests a waiver of the strict application of 52. Pa Code §57.72(d)(1) to permit PPL Electric to seek approval of the siting and construction of the Project needed to meet the electrical needs and demands of a new customer requesting transmission level service in Salem Township, Luzerne County, Pennsylvania.

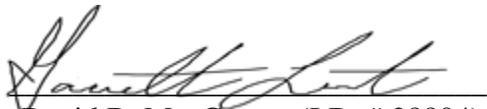
21. For these reasons, PPL Electric requests that the Commission approve this waiver of the strict application of the Commission's siting regulations and allow PPL Electric to proceed by means of single Letter of Notification, rather than multiple Letters of Notification addressing the same Project and need, for Commission review and approval to site and construct the Project.

III. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission grant the request for a waiver described above hereto, and allow PPL Electric Utilities Corporation proceed by a single Letter of Notification in lieu of multiple Letters of Notification for Commission review and approval of the proposed Susquehanna 230 kV and 500 kV Transmission Line Project located in Conyngham and Salem Townships, Luzerne County, Pennsylvania.

Respectfully submitted,

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PPL Services Corporation
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E-mail: mjshafer@pplweb.com


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mrulli@postschell.com

Date: August 25, 2025

Attorneys for PPL Electric Utilities Corporation